



# Tietoevry Human Rights Policy

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# 1. Purpose and Commitment

Tietoevry's Human Rights Policy outlines the company's endeavours to respect and support all internationally recognized human rights of all the individuals affected by our business and business partners in the domains where we operate, and across our value chains. The Policy defines the responsibility of Tietoevry to respect human rights and to make sure we avoid and address any situations of contributing to or being directly linked to human rights abuses through our business relationships. The Policy provides a clear framework for us as a company and for each employee to respect, protect and uphold human rights on a continuous basis.

The Policy is based on the United Nations Guiding Principles on Business and Human rights, the OECD Guidelines for Multinational Enterprises, and the UN Global Compact signed by Tietoevry. Our commitment and approach to respect internationally recognized human rights includes all the rights outlined in the International Bill of Human Rights. Due attention is also given to the rights of particularly vulnerable groups, including women; national or ethnic, religious, and linguistic minorities; children; people with disabilities; people with low digital literacy; LGBTQ people; and migrant workers and their families.

We respect domestic laws but recognize that conflicts may arise between domestic regulations in places

where we operate and where our solutions are used, and international human rights standards. When faced with a conflict between domestic legislation (or its enforcement) and international human rights laws, we seek to honour the principles of internationally recognized human rights to the greatest extent possible. In such circumstances we will work diligently to develop smart and creative ways to advance our commitment to respect human rights.

We recognize that among our salient issues<sup>1</sup> are freedom of opinion and expression, non-discrimination, privacy, and labour rights. Additional areas with human rights implications include conflict minerals when sourcing hardware, corruption, and negative impacts on the environment.

Beyond respecting human rights, Tietoevry believes in the active support of human rights in the various geographical locations where we operate, and we aim to use our leverage in this respect. Our stance is evident in our constant efforts to ensure access and availability to crucial services and societal functions that enable rights, such as healthcare, education, and jobs. In our own operations we enable equal opportunities for our employees by ensuring fair treatment and a culture of diversity and inclusion.

<sup>1</sup> A company's salient human rights issues are those human rights that stand out as they are at risk of the most severe negative impact through the company's activities or business relationships

## 2. Scope

The Policy applies to all employees at Tietoevry, as well as to the company's business partners and other entities along our value chain – both upstream and downstream.

Tietoevry expects its personnel, partners, and other parties whose operations may be directly linked to our operations, products, or services to respect and uphold human rights. In the absence of attention to human rights, Tietoevry will use its leverage and notify the respective party to adopt remedial measures. The company may exercise its right to terminate the business relationship should the abuse continue.

## 3. Implementation

We aim to implement our commitment to human rights through the following approaches, as set out in the United Nations Guiding Principles for Business and Human Rights. These efforts include:

- **Human rights due diligence:** Execute human rights due diligence on an ongoing basis across our business to address our human rights impacts. This includes identifying, assessing, investigating, preventing, mitigating, ending, monitoring, and remedying any actual or potential adverse human rights impacts that Tietoevry may cause, contribute to through its own activities, or that may be directly linked to our operations, products, or services by our business partners.  
Tietoevry is committed to engage with stakeholders affected by the company's operations (particularly members of any vulnerable groups) during the course of our human rights due diligence, as well as during the tracking, monitoring, and evaluation process.
- **Tracking performance and communicating:** Tietoevry establishes measurable and transparent indicators to assess the implementation of this Policy, and to process, gather, and analyse data on an ongoing basis. Throughout the tracking, monitoring, and evaluation process, we will aim to engage and seek feedback from parties whose human rights have been impacted. We commit to promptly and efficiently communicate on our human rights performance – both internally and externally – including about our due diligence, responses, and performance. We also report annually on our human rights performance.
- **Provide for grievance and remediation:** We will maintain, ensure, and promote channels for transparent and open communication, where all internal and external stakeholders can raise concerns without fear of retaliation or reprisal. We will also investigate fairly and provide access to effective grievance mechanisms. Reports of violations can always be made through our external whistleblowing channel: <https://Tietoevry.whistleblownetwork.net>. All reports are confidential and can be made in full anonymity.



## 4. Governance, Oversight, and Accountability

The ultimate accountability for Tietoevry's Human Rights Policy commitment lies with the company's President and CEO, under the monitoring of the Audit and Risk Committee of the Tietoevry Board of Directors.

The responsibility for implementing the Policy lies with operational and functional leaders across the group and its different businesses. As the role of managers is crucial in preventing human rights risks and impacts, all leaders within Tietoevry are required to lead by example. Managers are also responsible for ensuring that, within their area of responsibility, identification, prevention, and mitigation of human rights risks takes place on an ongoing basis.

Significant and challenging matters should regularly be escalated to Tietoevry Group Legal and Compliance, and salient human rights issues shall be reported periodically to the Audit and Risk Committee of the Tietoevry Board of Directors.

In terms of remediation, Tietoevry will actively collaborate with any state-based judicial and non-judicial grievance mechanisms, as well as with multistakeholder and industry-level bodies. We further aspire to have in place effective and efficient ways to provide for remediation, underpinned by legitimacy, accessibility, predictability, equity, transparency, rights compatibility, and continuity.

# 5. Document Information

## 5.1 Governing data

<b>Sponsor</b>	Kimmo Alkio, President and CEO
<b>Owner</b>	Kia Haring, VP, Head of Communications & Sustainability
<b>Manager</b>	Ulrika Lagerqvist von Unge, Senior Sustainability Manager
<b>Next review</b>	2023-01-01
<b>Effective date</b>	2023-01-01
<b>Last review date</b>	2022-11-10
<b>References</b>	The UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights), the principles concerning fundamental rights in the ten ILO core conventions , set out in the Declaration on Fundamental Principles and Rights at Work, i.e. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) , Right to Organise and Collective Bargaining Convention, 1949 (No. 98), Forced Labour Convention, 1930 (No. 29) and its 2014 Protocol, Abolition of Forced Labour Convention, 1957 (No. 105), Minimum Age Convention, 1973 (No.138), Worst Forms of Child Labour Convention, 1999 (No. 182), Equal Remuneration Convention, 1951 (No. 100), Discrimination (Employment and Occupation) Convention, 1958 (No. 111), Occupational Safety and Health Convention, 1981 (No. 155), Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187), OECD Guidelines for Multinational Enterprises, UN Global Compact ten principles.
<b>Process model</b>	Core Process

## 5.2 Change history

Version	Approval date	Owner	Manager	Editor	Approved by	Changes
V1.0A	2022-11-10	Kia Haring	Ulrika Lagerqvist von Unge		Kimmo Alkio	First official version

TietoEVRY creates digital advantage for businesses and society. We are a leading digital services and software company with local presence and global capabilities. Our Nordic values and heritage steer our success.

Headquartered in Finland, TietoEVRY employs around 24 000 experts globally. The company serves thousands of enterprise and public sector customers in more than 90 countries. TietoEVRY's annual turnover is approximately EUR 3 billion and its shares are listed on the NASDAQ in Helsinki and Stockholm as well as on the Oslo Børs. [www.tietoEVRY.com](http://www.tietoEVRY.com)

