

## INNA CODE OF CONDUCT POLICY

### 1. Word from the Group CEO

“We’ve renewed the INNA Group Code of Conduct. Code of Conduct applies to our day-to-day operations in all INNA business functions and companies.

Our work in the field of real estate management and real estate agency is based on expertise and trust. We ensure the sustainability and responsibility of our business operations by adhering to jointly agreed business principles and ethical practices. At the same time, we are laying the foundations for the company’s future success.

INNA’s vision is to be the leading pioneer in real estate and housing in the Nordic countries, known for its strong internal culture and values, and to provide the best customer and employee experience in the industry through continuous development and improvement.

We all make big and small choices every day. By following jointly defined principles, we can ensure that the Group companies’ good reputation is maintained and strengthened.

INNA’s values are: ‘succeeding together, bold renewal, and acting responsibly’. If we’re to live up to our values, we must have common rules. Shared values, expertise and trust must be reflected in our daily actions everywhere.”

Board of Directors, top management and all employees of INNA companies are committed to the principles set out in this Code of Conduct. We have Compliance program in place and we train our personnel and Board members regularly. We also expect all our business partners to act in the same way regarding environmental and social responsibility. Our Supplier Code of Conduct sets guidelines and expectations for our suppliers.

INNA has changed and developed significantly in recent years. In view of future growth and expansion, committing to common principles and rules is crucial for our success and image as a responsible company.

Helsinki 1.2.2026

Kari Virta  
CEO  
INNA Group

### 2. Introduction

The operating standards set out in this Code of Conduct apply to Boards of Directors, top management and all employees of INNA companies regardless of their work tasks or location.

INNA has also internal instructions for its employees. In case of any discrepancies between this Policy and other instructions, this Policy shall prevail.

If you have any questions about the content of this Code of Conduct, or how it should influence your everyday work or a specific matter, please reach out to INNA’s Legal Team.

### 3. Compliance with laws and regulations

We are personally responsible for all our actions. As experts, it is important for us to monitor the development of legislation in our area of responsibility and to ensure that our operations comply with the regulations in force.

In our operations, INNA is committed to complying with all applicable laws, rules and regulations and generally acknowledged ethical principles. Key legislation includes legislation on the protection of human rights and the environment, the protection of privacy, prevention of bribery and other forms of corruption, competition, and occupational health and safety.

### 4. Human rights and labour standards

INNA respects human rights and has zero tolerance for any breach of them. INNA follows internationally recognized principles and frameworks on human rights, such as the UN Guiding Principles, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. INNA is committed to preventing any human rights violations or negative impacts within its own operations and in its value chain and expects the same from its business partners and suppliers.

#### 4.1. Occupational health and safety

All employees and individuals working under the control of INNA are offered a safe and healthy workplace. INNA promotes a goal-oriented, collaborative and supportive work environment in which employees can engage in an open and constructive dialogue on all work-related issues, and employees can pass things on to their supervisor or INNA's Legal Team if necessary.

INNA complies with all applicable national and international health and safety laws and regulations. INNA is committed to zero fatalities at the workplace and any work-related injuries or ill health amongst employees will have high consequences. INNA also does not tolerate any violence or threat of violence or harassment at the workplace. It is also INNA's ambition that the work environment of our business partners is safe and healthy. INNA promotes employee wellbeing.

#### 4.2. Working hours, living wages and benefits

INNA ensures that a regular working week complies with relevant international labor standards. Overtime is voluntary and restricted. Employees are guaranteed breaks and annual paid leave in accordance with applicable law or collective bargaining agreements, whichever is higher.

INNA is committed to paying living wages in our operations and supply chain. This means that INNA pays wages and benefits according to, at a minimum, applicable laws, national standards, industry benchmark standards and relevant collective agreements. In all events, the wages shall always be enough to meet basic needs and to provide some discretionary income.

Wages and career advancement are based on everyone's own achievements, competence and skills. INNA pays accurate wages in a timely manner, including overtime, and wage deductions are not used as a disciplinary measure.

### **4.3. No tolerance for discrimination**

INNA does not tolerate discrimination or harassment against anyone (employee or business relation representative) based on age, race, gender, religion, ethnicity, sexual orientation or disability, health or other such characteristics. Similarly, INNA does not tolerate any form of harassment including violence, sexual harassment, punishment, or abuse of any kind.

### **4.4. Diversity, equity and inclusion**

Employees are treated equally, according to their abilities and qualifications in every employment decision and INNA is committed to equal pay for equal work and equal opportunities.

INNA believes diversity strengthens our competitiveness and we strive to reflect the societies where we operate by working towards fair representation of underrepresented groups. Diverse working teams enable us to explore different perspectives and challenge our way of thinking, contributing to better decision making. Diversity to INNA means various aspects of diversity including but not limited to gender, ethnicity, sexual orientation, disability, health, socioeconomic and cultural diversity.

INNA aims to create a culture with conditions for all employees to feel welcome, valued and included.

### **4.5. Freedom of association**

INNA respects freedom of association and the right of workers to organize themselves professionally. Joining or not joining a trade union or association is a personal decision of INNA employees. However, employees must act in accordance with INNA's Code of Conduct and other Policies at these meetings.

## **5. Protection of company information and resources**

*"Prevent, protect and pay attention"*

Any of INNA's information and any information that INNA receives from its contractors, business partners or other business associates that is not in the public domain is considered confidential. The same applies to the personal data of the managers and employees of INNA and the personal data of INNA's contractors, business partners or other business associates. INNA takes appropriate measures to ensure the accuracy, confidentiality and security of data and information INNA expects the company's managers and employees to protect all the company's resources, which may be tangible or intangible assets such as brands and other intellectual property rights, confidential information and personal data. All resources of the company must be used honestly, efficiently and solely for legitimate business purposes.

## **6. Business ethics**

### **6.1. No tolerance for corruption and bribery**

*"We understand ethics in our business"*

INNA is committed to complying with applicable anti-bribery and anti-corruption regulations and conducting its operations with integrity. Corruption – the abuse of power for personal gain – comes in various forms such as bribery, facilitation payments, excessive hospitality or business entertainment, extortion and conflicts of interest. INNA has zero tolerance for corruption. INNA does not offer or pay bribes or illicit

payments to authorities or other parties or advise or recommend anyone to offer or accept them. INNA does not accept bribes or illicit payments from any source. We intervene in any abuses that come to our attention and cooperate with relevant authorities.

Giving and receiving occasional and low-value gifts and hospitality that are openly and appropriately disclosed and do not create or are not perceived to create expectations of consideration are allowed in the business of INNA.

For more information, see our Anti-bribery and Corruption Policy.

## **6.2. No conflicts of interest**

*“INNA’s decisions are always made in the best interests of INNA”*

Situations which cause conflicts of interest must be prevented. A conflict of interest arises when an employee’s financial or other personal interest, remuneration or relationships may affect the employee’s work within INNA and make it difficult to make decisions in the best interests of INNA. When a conflict of interest arises or is likely to arise, it must be disclosed transparently and promptly within INNA. The possible or actual situation will be assessed, and appropriate measures will be decided on and carried out if necessary.

## **6.3. Anti-money laundering and transparency with financial activities and compliance with sanctions**

*“We screen our counterparties and conduct business with only responsible, good reputed counterparties”*

INNA does not condone any actions related to criminal activities that aim to conceal the illegal origin of funds (i.e. money laundering). INNA does not condone the financing of terrorism.

INNA screens business partners in order to reduce the risk of becoming involved in unethical, illegal or criminal activities. INNA is committed to fully comply with applicable anti-money laundering and terrorist financing laws and sanctions laws and regulations including United Nations sanctions and applicable sanctions under the national laws and laws of the European Union, the United States and the United Kingdom. INNA does not engage with business partners that are the target of any economic sanctions or export control laws. INNA does not engage in transactions with parties that participate in money laundering or criminal tax evasion.

All financial activities should be conducted transparently and recorded accurately.

Furthermore, INNA does not condone fraudulent acts in any form. This includes deliberately misleading or otherwise unfair means for unjustified or unlawful economic gain or deliberately misrepresenting information that affects financial statements and reporting. The following are also strictly prohibited: misuse or misappropriation of money or assets, theft; tampering with financial statements and reporting; destruction, deletion or improper use of data and equipment; and neglecting to report violations of law, regulations or company policies.

For more information, see our Trade Compliance Policy.

#### **6.4. Purchasing, selection of suppliers and business partners**

A significant part of INNA's impact on sustainability is related to our value chain. Therefore, INNA is committed to responsible procurement and purchasing practices. The products INNA uses, and the suppliers INNA cooperates with, are directly linked to INNA's sustainability performance. To ensure cooperation with responsible organizations INNA conducts assessments for all new and existing suppliers.

INNA aims to identify any potential human rights or environmental violations and other illegal or unethical activities within its value chain. INNA's Supplier Code of Conduct sets the standard for respect for human rights, working conditions, environmental and societal performance, and ethical business conduct that INNA's suppliers are expected to follow.

#### **6.5. Fair competition**

*"There is no other way."*

INNA supports the principles of free enterprise and fair competition and complies with all applicable competition laws and regulations. INNA employees do not engage in any anti-competitive practices including market allocation, improper information exchange, production and sales quotas, or bid rigging with its competitors. INNA follows these principles in all our contacts with competitors, contacts with our value chain, and in our general communication.

For more information, see our Competition Policy.

#### **6.6. Information security and protection of privacy**

INNA is committed to high security awareness. Information is considered a critical asset and resource and its incorrectness or unavailability could affect business competitiveness. Information security is therefore vital.

INNA ensures that its IT security arrangements are appropriate to the requirements of the information assets concerned and that it implements appropriate governance and management arrangements to manage risk, monitor compliance and report and respond effectively to any incidents.

INNA values the privacy of employees and other individuals and complies with all applicable data protection laws and regulations when collecting, processing, transferring and protecting personal data. INNA protects personal data against misuse, theft, and improper or unlawful disclosure at all times.

For more information, see our Data Protection Policy.

#### **6.7. Sustainable tax**

INNA has a zero incident policy for tax compliance. INNA complies with tax laws and practices where we operate. INNA pays the right amount of tax, in the right place, at the right time.

## 7. Environment

INNA is committed to environmental sustainability and acknowledges the importance of reducing the impact on the environment in its own operations and in its value chain. INNA complies with all applicable and relevant environmental and climate laws as well as other environmental or climate standards and requirements.

INNA is committed to acting with due diligence and continuously seeks to identify and assess impacts its operations have or may have on people and the environment. [INNA has embedded responsible business conduct into its policies and management systems and integrated due diligence into its business decision-making, processes and risk management systems.]

The foundation of INNA's sustainability work is INNA's material topics that show where INNA should prioritize and use its resources. The material topics are identified through the double materiality assessment. INNA's prioritized areas are related to climate impact, employee well-being, diversity and inclusion, the way INNA conducts business and how it affects its employees' and customers' attitudes towards sustainability.

INNA works continuously and systematically towards better environmental performance by setting targets, measuring, and reporting on our progress in respect to environmental aspects that are determined as material for our business. INNA is committed to combat global warming in sustainability strategy.

For more information, see our Environmental Policy.

## 8. Risk management policy

Risk management is an integral part of effective management practice. By appropriate risk management INNA aims to ensure the continuity of our operations and achievement of our business objectives.

For more information, see our Risk Management Policy.

## 9. Communication

*“Every action and every word affects the brand.”*

Specifically designated individuals are responsible for INNA's media relations. INNA communicates transparently, precisely and promptly. Products, services, prices and other information are clearly and truthfully stated in marketing, and no misleading terms are used.

## 10. Whistleblowing channel

Violations of this Code of Conduct, INNA policies and practices, or laws and regulations may result in disciplinary action and even termination of employment. Any disciplinary action taken is always reasonable, proportionate to the violation, and in accordance with applicable laws and regulations. Violations of laws and regulations can result in civil or criminal lawsuit. Suspicions of abuse can be

reported in confidence and anonymously by submitting a report through the whistleblowing channel. If an employee suspects abuse, the employee is encouraged to contact their own supervisor first.

For more information, see our Whistleblowing Policy.

## 11. Reporting concerns and consequences of violation

If you become aware of or suspect a possible violation of law, rule, regulation or this Code of Conduct or any other of INNA’s policies, you shall contact INNA’s Legal Team, CEO, Head of business unit or your closest supervisor.

7 (7)

You can also raise concerns through INNA’s whistleblowing system, available in INNA’s web pages. INNA will not tolerate any attempt to take adverse action against an employee for reporting a genuine concern regarding suspected wrongdoings. Retaliation against anyone who speaks up is a violation of the Code of Conduct and will not be tolerated.

INNA does not tolerate any illegal or unethical behavior. Violations of this Policy are likely to damage INNA’s brand and reputation. Failure to follow this Policy is taken seriously and may result in disciplinary action appropriate to the violation, including, but not limited to, termination of the employment.

## 12. Review and follow-up

Compliance with this Code of Conduct will be monitored through internal and external audits, and routine follow-ups of all reported matters.

Effective date	Version	Change decription
2016	v1	original
February 2018	v2	updated
December 2021	v3	updated
December 2023	v4	updated
November 2025	v5	updated
February 2026	v6	brand change to INNA