



# LIVINIT Code of Conduct

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## 1. Human Rights Commitment

**LIVINIT is committed to respecting internationally recognized human rights in all its business operations and business relationships, including its supply chain and subcontracting chain.** This commitment is guided by the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO core labour principles and rights at work.

- LIVINIT prohibits child labour, forced labour, human trafficking, discrimination, harassment, and retaliation.
- LIVINIT supports freedom of association, collective bargaining, fair remuneration, lawful working time, and safe and healthy working conditions.
- LIVINIT expects the same standards from associates, suppliers, subcontractors, consultants, and other business partners, and these standards must be cascaded through subcontracting chains where relevant.
- LIVINIT is committed to providing or supporting appropriate remedial actions where it causes or contributes to adverse human rights impacts, and to addressing concerns raised through accessible and confidential reporting channels.
- In fragile or conflict-affected environments, LIVINIT follows a do-no-harm approach and seeks to identify, prevent, and mitigate risks linked both to its own operations and to the broader conflict context.



## 2. Intention and Scope

This Code of Conduct sets out the principles and ethical standards of business behaviour expected by LIVINIT LLC from all its associates, suppliers, subcontractors, and consultants. The purpose is to ensure responsible, transparent, and sustainable operations and to foster long-term cooperation based on shared values.

All covered parties are expected to implement these standards in their own operations and, where relevant, to replicate them throughout their subcontracting chain.

## 3. Ethical Business Conduct

The Supplier shall conduct business honestly, transparently, and in compliance with applicable laws and regulations.

Corruption, bribery, fraud, money laundering, facilitation payments, and unfair competition are strictly prohibited.

The Supplier shall avoid and prevent conflicts of interest with LIVINIT and its clients. Any detected conflict must be disclosed without delay.

The Supplier shall respect and protect confidential information, personal data, and intellectual property of LIVINIT, its clients, and other business partners.

The Supplier must ensure compliance with the codes of conduct, policies, and instructions of LIVINIT's clients.

If a client of LIVINIT requires a full-time (8 hours per working day) commitment from the Supplier's consultant, the consultant must not engage in parallel professional activities that could interfere with that assignment.

The Supplier must act responsibly in fragile or conflict-affected contexts and must not knowingly support corruption, organized crime, abuse, or other harmful conduct through its business relationships or payments.

## 4. Meeting Legal Obligations

LIVINIT expects associates, consultants, and suppliers to comply with all applicable local, national, and international laws, including but not limited to labour law, data protection (including GDPR 2016/679 where applicable), anti-bribery, anti-money laundering, tax, competition, sanctions, export control, and trade regulations.

Covered parties must maintain accurate records, cooperate with lawful verification requests, and ensure that taxes, statutory payments, and other mandatory employer or contractor obligations are properly handled in the jurisdictions in which they operate.



## 5. Environmental Responsibility

Suppliers must strive to minimize the environmental impact of their activities, including:

- reducing greenhouse gas emissions, waste, and energy consumption,
- preventing pollution and hazardous substance use,
- protecting biodiversity, land, water, and natural resources,
- applying renewable energy and sustainable practices whenever possible.

## 6. Social Responsibility

Recruitment and employment practices must comply with international labour standards and applicable local laws.

Suppliers must uphold human rights and must not use child labour, forced labour, or human trafficking in any form.

All employees and contractors must be treated with dignity and respect, free from harassment, abuse, or discrimination.

Suppliers must ensure fair remuneration. Wages or fees must be lawful, transparent, and paid on time. LIVINIT encourages compensation that supports a decent standard of living in the relevant local context.

Suppliers must comply with applicable rules on working hours, rest periods, breaks, leave, sick leave, parental leave, and mandatory benefits.

Equality of opportunity, diversity, and inclusion must be actively promoted.

Employees and workers must be protected when exercising their rights to freedom of association, collective bargaining, and peaceful assembly.

Special attention must be given to vulnerable groups and to risks that may increase in fragile or conflict-affected settings, including informal subcontracting chains and discriminatory treatment of displaced or otherwise vulnerable persons.

## 7. Health and Safety

Suppliers must provide a safe and healthy working environment, in line with or exceeding applicable legal requirements.

Employees and relevant contractors must receive adequate safety information and training.

Emergency procedures, suitable tools, and protective equipment must be available where relevant.



Workloads, deadlines, and methods of supervision must not create unreasonable health or safety risks, including psychosocial strain.

Incidents and serious near misses must be recorded where relevant, and preventive measures must be implemented.

## **8. Compliance with this Code, Reporting Channels and Remedial Actions**

Suppliers are expected to implement internal mechanisms for monitoring compliance with this Code and to correct non-compliance without delay. If non-compliance is not addressed, LIVINIT reserves the right to suspend or terminate cooperation.

Retaliation against whistleblowers, complainants, witnesses, or any person raising a concern in good faith is strictly prohibited.

Concerns or violations may be reported directly to LIVINIT through its designated reporting channel: [info@livinit.fi](mailto:info@livinit.fi). Reports may relate to human rights concerns, labour issues, discrimination, harassment, corruption, legal non-compliance, health and safety matters, or other violations of this Code.

Reporting channels must be accessible, confidential, and understandable to relevant stakeholders. Reporting to only a direct manager or recruiter is not considered sufficient as the sole mechanism.

LIVINIT will review reported concerns in a timely manner, protect confidentiality to the extent reasonably possible, and assess whether corrective or remedial action is required.

Where LIVINIT causes or contributes to adverse impacts, it will take or support appropriate remedial actions. Such actions may include correction of practices, reimbursement or compensation where appropriate, restoration measures, formal apology, referral to competent authorities, and steps to prevent recurrence.

## **9. Supplier Sustainability Policy**

Environmental protection: reduce emissions, waste, and energy consumption; comply with environmental laws; share relevant performance data upon request.

Social responsibility: respect human rights, ensure fair working conditions, promote equality and diversity, and maintain effective grievance handling mechanisms.

Ethical conduct: conduct business with integrity, avoid conflicts of interest, corruption, or fraud, and protect data privacy and intellectual property.

LIVINIT reserves the right to conduct proportionate audits and reviews to verify compliance. Non-compliance that is not remedied within a reasonable timeframe may result in termination of cooperation.



## 10. Applicability

By signing this Code of Conduct, the Supplier, Associate, Consultant, or Subcontractor confirms that it is committed to the principles and requirements outlined herein and will apply them in its own operations and, where relevant, in its subcontracting chain.

Acknowledged and approved by \_\_\_\_\_  
Place and date \_\_\_\_\_  
Supplier / Associate / Consultant \_\_\_\_\_  
Signature \_\_\_\_\_



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