

Stargames Business Partner Code of Conduct

‘Through brand, we have to power to change lives’

The Stargames brand encourages you to promote individual well-being – wherever and whenever people are with us, they will achieve better healthy and safe life values and lifestyles with products and services the Stargames brand provide!

The brand prioritizes and refines researched and recognized high-quality human health values related to practical lives and its events. Well-being and quality of life are related to leisure time exercise activities and concreteness of ethical principles of self-care to close the gap between modern work and leisure time.

We are committed to this purpose, it reflects who we are as a company, how we manage our business internally, and how we work externally with customer and business partners alike.

Business Partners are essential contributors to our success. Our Business Partner Code of Conduct clarifies the responsibilities and expectations for ethical and responsible business practises for our Business Partners.

The Business Partner Code of Conduct sets forth the principles and high ethical standards that we hold ourselves to, and that we expect our Business Partners to comply with, throughout the course of our business relationship. Stargames Business Partners will conduct their business practises and activities in accordance with applicable law, with integrity, fairness, respect and in an ethical manner.

This Partner Code of Conduct is not intended to replace, supersede, or conflict with any applicable law, regulation or contractual obligation with Stargames.

Business practises, Ethics and Compliance

Although Stargames recognizes the different legal and cultural environment in which its Business Partners operate throughout the world Stargames Business Partners must comply with the fundamental legal and ethical principles described in this Business Partner Code of Conduct.

A breach of this Business Partner Code of Conduct will be considered a breach of the Business Partner’s contract with Stargames and may lead to the termination of the business relationship with Stargames Oy or its affiliates.

Anti-Corruption: Stargames Business Partners will comply with all applicable anti-corruption and anti-money laundering laws. All forms of bribery, kickbacks and other corruption are prohibited. No Stargames Business Partner will improperly influence any act or decision of any governmental official, employee or political candidate, including, without limitation through the provision of any improper or unlawful gifts, meals, travel or entertainment. Instead, Stargames Business Partners will always act honestly and transparently with any governments or government officials.

Confidentiality: Stargames may disclose certain confidential information to Business Partners during the course of their business relationship. The Business Partner may only provide access to Stargames confidential information to persons within its organization having a need to know the information in connection with performance by the Business Partner of its obligations to Stargames. As appropriate, Business Partners may be requested to enter into separate confidentiality agreements with Stargames.

Conflict of Interest: Business Partners should avoid any situation that might conflict or appear to conflict with the best interests of Stargames. For purposes of this policy, a potential conflict of interest occurs when a Business Partners’ outside interests interfere with Stargames interests.

Data Protection: Stargames Business Partners shall comply with all applicable data protection laws in collecting, processing, storing or otherwise handling personal data of any individuals, including, without limitation, their own employees and employees of their customers, suppliers and business partners.

Fair Competition and Antitrust Laws: Stargames Business Partners will conduct their business in full compliance with all applicable fair competition and antitrust laws. They shall not enter directly or indirectly into any illegal agreements with their competitors nor exchange sensitive information, e.g., regarding markets, customers, strategies, prices and the like. All Business Partners and all persons acting on their behalf shall participate in public tenders and private sector bidding procedures by strictly following the applicable laws and regulation.

Human Rights: Stargames Business Partners will respect and comply with all fundamental human rights and individual freedoms set out in the United Nations Universal Declaration of Human Rights. In addition, Stargames Business Partners will not tolerate modern slavery, including any form of slavery, servitude and forced or compulsory labour.

Information security: Stargames Business Partners shall secure the IT landscape by restricting any unauthorized or otherwise inappropriate access, disclosure, destruction, modification or copying of sensitive information.

Integrity: Stargames Business Partners are expected to conduct their business in a professional manner at all times and in accordance with standards set forth in all applicable international and national laws and regulations while recognizing that Stargames's requirements may sometimes exceed those standards. At minimum, Business Partners and all persons acting on their behalf must act with integrity, honesty and fairness in all aspects of their business.

Non-discrimination: Stargames Business Partners are expected to adopt and enforce policies with effectively prohibit discrimination or harassment on the grounds of gender identity or expression, marital or parental status, ethnic or national origin, religious belief, political affiliation, age, physical or mental disability, medical condition, veteran status, membership in a trade union or employee organization or other protected characteristic or status. Stargames Business Partners will prevent all forms of harassment and comply with international labour standards.

Raising Concerns and Reporting Questionable Behaviour

Stargames Business Partners are encouraged to work with their primary Stargames Manager in resolving a business practice or compliance concerns. However, Stargames recognizes that there may be times when this is not possible or appropriate. In such instances, Stargames Business Partners should report any concerns about violation of this policy or applicable laws to their legal department and/or their ethics and compliance officer.

Any breach of this Stargames Business Partner Code of Conduct shall be reported without undue delay to stargames@stargames.fi

Behalf on Stargames,

WMS -Tilit, Financial Management Services

Mika Wirtanen
Chairman