



Code of Conduct

Basware Corporation

(Updated in 2026)

Basware Code of Conduct

Introduction

Basware is the global leader in providing AP automation, e-invoicing solutions and value-added services in the world of commerce.

This Code of Conduct is designed to establish a set of common principles for all Basware employees globally. Basware expects that all Basware suppliers, business partners and subcontractors also follow the principles of this Code of Conduct, and more specifically, a separate [Supplier Code of Conduct](#) in connection with their work for, or on behalf of, Basware.

The Code of Conduct provides Basware's customers, business partners, investors and other stakeholders information about the principles according to which Basware operates and expects its suppliers, partners and subcontractors to operate.

The Code of Conduct is reviewed regularly to ensure that its contents conform to the ethical and regulatory standards that are applicable for Basware at any given time.

Basware organizes ongoing employee training on the contents of this Code of Conduct. Employees are encouraged to ask for advice from their managers when uncertain about the right thing to do.

Basware Values

Basware's company culture is based on high business ethics and company values that guide our operations. Our values lie at the very heart of our culture wherever we work.

We Drive Customer Value

We care about delivering long-term value to our customers, partners, and fellow Baswareans. We always strive for agile and responsive way of working.

We Take Ownership

We are trusted, collaborative partners taking initiative and accountability. We act with integrity and aim for sustainability in everything we do.

We are Bold

We have the confidence to explore, challenge the status quo, and continuously improve. We are proud advocates of what we do. We value diversity of backgrounds and opinions as the foundation of innovation and growth.

Business practices

Compliance with Laws and Regulations

Basware is committed to full compliance with all applicable laws, rules and regulations in all locations where Basware operates. Basware also follows practices related to good corporate governance. If applicable laws and regulations are more permissive than this Code of Conduct, Basware complies with this Code of Conduct. If applicable laws and regulations are more restrictive, we comply with the legal requirements. In addition, Basware always acts in accordance with the highest standards of business ethics.



Anti-Bribery and Anti-Corruption

As part of Basware's commitment to conducting its business in an honest and ethical manner, Basware takes a zero-tolerance approach to bribery and corruption and upholds all laws relevant to countering bribery and corruption in all jurisdictions in which it operates. Basware has a separate Anti-Bribery and Anti-Corruption Policy, which sets out the responsibilities of all Basware employees in observing and upholding Basware's position on Anti-Bribery and Anti-Corruption and which complements this Code of Conduct. The policy provides guidance on how to identify prohibited activities such as offering or accepting a bribe, bribing a public official, offering or accepting so-called 'facilitation payments' or 'kickbacks' and inappropriate client entertainment, gifts and hospitality practices.

Please refer to the [Anti-Bribery and Anti-Corruption Policy](#) for further details.

Import, Export and Trade Compliance Rules

As a global company, Basware exports its services across national borders. Our business transactions can be subject to various trade controls and laws that regulate export and import. We are committed to complying with the laws that govern global trade of our services.

Antitrust and Competition Laws

Basware complies with all applicable competition laws in all locations where Basware operates. Basware promotes free and open competition and does not engage in practices that have the objective or effect of restricting or distorting competition.

Anti-Money Laundering

Basware complies with all money laundering laws or laws prohibiting financing for illegal or illegitimate purposes. "Money laundering" is the process in which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

Political Involvement

Basware does not take political stands and does not give financial or other kinds of support or assistance to individual politicians, candidates, political parties or institutions. The Basware name, logo, or any resources owned by Basware shall not be used to promote the interests of political parties or candidates.

Conflicts of Interest

Basware employees must avoid any actions or situations that could result in a conflict of interest or the appearance of one. A conflict of interest arises when personal interests interfere, or could be perceived to interfere, with those of Basware or with the ability to perform duties objectively and ethically. Employees must promptly disclose to their manager any actual or potential conflicts of interest, including situations that may give the appearance of a conflict.

This includes involvement in external activities and participation in surveys that involve compensation, payment, or other personal benefits. Employees must obtain prior approval from their manager before participating in such activities, as they may present information security and integrity risks.

Employees must not engage in any relationship, situation, or arrangement that conflicts with Basware's interests or would compromise the ability to ethically fulfill contractual obligations to Basware in a professional manner.



Social Responsibility & Workplace Environment

Human Rights

Basware unconditionally supports and promotes human rights. Basware does not tolerate, contribute to or facilitate any activity that violates human rights.

People are employed based on the principle of equal opportunity and without distinction to race, sex, religion, political opinion, disability, sexual orientation, gender identity, social status, age or any other legally protected status. Basware does not tolerate in any context the use of servitude, child labor, forced labor, human trafficking, or slavery in our operations in any region we operate, and will be specifically compliant with the International Bill of Human Rights consisting of the Universal Declaration of Human Rights as well as the two supporting Covenants on Civil and Political Rights and Economic, Social and Cultural Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Basware is committed to ensure alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights and to act according to the values declared within the United Nations' Universal Declaration of Human Rights, and we commit to obey the United Nations' Global Compact principles.

Basware expects its leadership, employees and contractors to enable and foster human rights in our areas of influence and to speak up when they believe there is a suspected human rights violation.

Anti-Discrimination and Anti-Harassment

Employment at Basware is based solely upon individual merit and qualifications directly related to professional competence. Basware never discriminates against or treats employees or job applicants unfairly in matters that involve recruiting, hiring, compensation, promotion, discipline, termination, training, retirement, or any other term or condition of employment. Making employment decisions based on personal characteristics, such as race, sex, religion, political opinion, disability, sexual orientation, gender identity, social status, age or ethnic origin, trade union activities or any other legally protected status is against our policies.

Basware is committed to ensuring that all employees are treated with dignity and respect at all times. Basware seeks to provide a work environment that is free from harassment and any other offensive or disrespectful conduct. Harassment includes any physical, sexual, psychological or verbal abuse, intimidation, or other unwelcome verbal, visual, or physical conduct that creates an intimidating, hostile or offensive work environment.

Freedom of Association and Collective Bargaining

In conformance with local laws in the countries where we have employees, we recognize and respect the right of all employees to freedom of association with others, without fear of harassment, intimidation, penalty, interference or reprisal, including the right to bargain collectively and respect the right of employees to decide not to.

We value employees openly communicating ideas and concerns regarding their working conditions.

Equal Opportunities, Diversity and Inclusion

Basware supports diversity in the workforce where employees are recognized for who they are and for what they contribute. We respect each person as an individual regardless of race, sex, religion, political



opinion, disability, sexual orientation, gender identity, social status, age or any other legally protected status. Basware's goal is to attract, develop, and retain a workforce that is diverse and to ensure an inclusive work environment that embraces employees' differences.

Health and Safety

Basware is committed to a safe and healthy workplace. Basware has a global Workplace Health and Safety policy and complies with the Workplace Health and Safety legislation in each of the countries within which it operates. Workplace Health and Safety training forms part of our Corporate Compliance Training program and is mandatory for all employees to complete. Each employee is responsible for ensuring healthy and safe working conditions and for the timely reporting of all workplace accidents and safety risks. Basware supports activities and initiatives that improve employee health and well-being and strive for continuous improvement wherever possible.

Fair Wages and Working Hours

Basware is committed to following all applicable wage and working hour laws and regulations.

Expected Workplace Behaviors

Basware expects employees to display respectful and professional behavior at all times. This behavior would include, but is not limited to:

Act with honesty, integrity and fairness in all areas of work, including at external facing work related meetings and functions:

- Support workplace diversity, respect the values of others and work towards a fun, productive, innovative team environment, free of discrimination, bullying and harassment;
- Ensure that communication channels, tools and platforms are used respectfully and inclusively, without discriminating, bullying or harassing against others based on race, gender, age, religion, or any other protected characteristic.
- Demonstrate on-the-job behavior that enhances the company's professional reputation;
- Demonstrate support and care for others;
- Display constructive conflict resolution behavior; and follow reasonable and lawful requests from management
- Ensure close personal relationships do not affect performance, fairness, or team dynamics. Family members, spouse or partner should immediately inform the relationship to the Manager and Human Resources if one individual has a direct or indirect decision-making authority over the other.

Basware has a comprehensive Employee Relations Policy that guides our actions in relation to issues that impact the employment relationship.

Environmental Responsibility

Respect for the Environment

Basware is committed to minimizing the environmental impacts of its activities worldwide. Furthermore, as the global leader in providing AP automation, e-invoicing solutions and value-added services and as the largest open e-invoicing network in the world, Basware aims to foster environmental awareness and responsibility among its employees, customers and suppliers.

Basware complies with all applicable environmental regulations and expects its suppliers and partners to do so, too. Basware pursues a precautionary approach to environmental challenges by undertaking



activities to promote greater environmental responsibility and encouraging the development, diffusion and use of environmentally sustainable technologies and solutions, such as electronic invoicing. Basware is committed to open and transparent communication on its environmental performance.

Please refer to the [Environmental Policy](#) for further details.

Information Security and Data Protection

Protection of all business assets, including information, technology, and facilities

Basware's intellectual property is an invaluable asset that must be protected at all times. Intellectual property includes our brand, trademarks, package designs, logos, copyrights, inventions, patents and trade secrets.

Basware ensures that due attention is paid to the appropriate security and safe keeping of proprietary information. Basware is committed to protecting the confidentiality of the information of its customers and other business partners and does not disclose such information improperly.

Data privacy is important to Basware. Basware processes all data about identified or identifiable individuals – or “personal data” – with due care and in accordance with applicable data protection laws. We are committed to data protection and privacy compliance across our Basware operations, we only collect or use employee personal information for the performance of our employment contract, and we are also committed to helping our customers with their data protection compliance journey by providing robust privacy and security protections built into our services and agreements. Read more about [Basware's Privacy policy](#).

Basware is committed to follow applicable accounting principles and standards, to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial and non-financial reporting complies with law.

Raising concerns

Any violation of the principles defined in this Code of Conduct should be reported to Basware immediately. Report can be made to your line manager, or to Legal or Human Resources teams. Basware employees may also report any violation or suspected violation of this Code of Conduct by using the online [whistleblowing channel](#). The identity of the person making the report will be confidential and known only to the people necessary to ensure that the case is handled properly. It is also possible to make the report anonymously. Any Basware employee who makes a whistleblowing report is protected from any repercussions, such as dismissal and other forms of reprisals. To ensure that issues do not escalate to the point where they become a whistleblowing case, Basware focuses on communicating the company's values, rules and regulations regarding ethical conduct and encourage open communication within the company.

Questions or suggestions

If you have any questions regarding the proper conduct in a certain situation, or if you need assistance to take the appropriate action, please feel free to talk to your manager or contact the HR department at hr@basware.com.



Policy Details

Policy Name	Code of Conduct
Version	v2
Policy Author	Manager, HR Operations Development
Department	HR and Development
Policy Area	HR
Global/Local	Global
Internal/Public	Public
Review Cadence	2 Years
Scheduled Review Date	Jun 26, 2028
Approved by (Owner)	CHRO
Date Approved	Jun 26, 2026
Published on Website	Yes

