



## REMEDY ENTERTAINMENT PLC CODE OF CONDUCT

<b>Policy Name</b>	Code of Conduct (the “Code”)
<b>Owner</b>	Head of Legal Henrik Hautamäki
<b>Approved By</b>	Board of Directors (“Board”) on 10 February 2022
<b>In Force</b>	Until further notice
<b>Updates</b>	Last update 19/12/2024

### 1 APPLICABILITY AND PURPOSE

This Code applies to Remedy Entertainment Plc, its subsidiaries (together “Remedy”) and all their directors, officers, employees, consultants, and freelancers (hereinafter “employees”, “we” and “us”). Every Remedy employee is expected to read and understand this Code, and to abide by it. Remedy also requires that its suppliers and business partners comply with the principles of this Code, as applicable.

This Code reflects Remedy’s core values and forms a guide to ethical conduct. Its purpose is to help us live by our values and do business the right way for all our stakeholders – gamers, customers, business partners, colleagues, and shareholders.

### 2 ANTI-HARRASMENT AND NON-DISCRIMINATION

Remedy strives to provide an inclusive workplace in which everyone feels respected and safe. As our Anti-Harassment Policy makes clear, we have a zero-tolerance policy against all types of harassment and discrimination based on gender, race, colour, nationality, religion, sexual orientation, age, or any other similar characteristic, whether it is verbal or physical. We urge you to report any harassment or discriminatory behaviour that you come across immediately.

### 3 CONFIDENTIALITY

Each of us has a duty to protect Remedy’s and our business partners’ information. Confidential information should never be disclosed to third parties or discussed in public places. You are allowed to disclose confidential information to other Remedy employees only if it is strictly necessary for them to have this information in the course of their duties. Our duty to preserve Remedy’s confidential information continues after we leave the company.<sup>1</sup>

### 4 PROTECT OUR INTELLECTUAL PROPERTY

Remedy’s most valuable asset is its intellectual property, which we must all protect. Every employee must comply with the security and working practices for Remedy property, such as files, code, software, technology, tools, and resources. The misuse of this property is not tolerated.

### 5 ACCURATE FINANCIAL RECORDS

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<sup>1</sup> If you are unsure about whether information should be treated as confidential, check it with the legal department. Common examples of confidential information include information about a new game, trade secrets, source or object code, financial information and business plans, salary, and personnel information as well as internal metrics.

## **6 AVOID CONFLICTS OF INTEREST**

Every employee has a duty to always do what is best for Remedy. One aspect of this is to avoid conflicts of interests, which can arise any time our personal interests conflict with, or even just appear to conflict with, the interests of Remedy. Investing or owning shares in a current competitor or business partner or serving on its Board may, for example, cause a conflict of interest.<sup>2</sup> Likewise, outside employment can create a conflict of interest if it is not cleared with our HR Department. If you have any question as to whether a situation is likely to create a conflict, you should always ask the legal department about it before you act.

## **7 NO MONEY LAUNDERING**

Money laundering can take many shapes and forms. Under Finnish law, it refers to accepting funds or assets that have been illegally obtained or to make those funds or assets look legitimate. If you are working directly with our suppliers or business partners, raise a flag if someone:

- Tries to make large payments in cash.
- Who is not mentioned in the contract makes a payment.
- Tries to make payments in other currencies than those specified in the contract.
- Makes payments from an unusual, non-business account.

If you have any questions in this respect, feel free to contact our legal department.

## **8 NO BRIBERY OR CORRUPTION**

You can never pay or accept bribes in any form, whether it involves a public official or a private business partner. Applicable laws limit the gifts and entertainment that we can offer to our business partners or receive from them. Also, even if specific conduct would not be illegal, the mere appearance of being improperly influenced can be a risk for us. If you are unsure about whether you can offer or accept a gift or entertainment, check it with our legal department before you act.<sup>3</sup>

## **9 RESPECT HUMAN RIGHTS AND DEMAND INTEGRITY FROM PARTNERS**

Our goal is to maintain a supply chain that lives up to our standards, which includes following applicable laws and conducting our business in an ethical manner. We do not tolerate human rights abuses in our workplace and require that our suppliers and business partners uphold the same values and standards that we set for ourselves. As part of this, we commit to that none of our games are made using child labour or working conditions that are not in accordance with international conventions.

## **10 INSIDER TRADING IS STRICTLY FORBIDDEN**

It is strictly forbidden to buy or sell Remedy shares or options while you have inside information about Remedy or companies that we do business with. We keep inside information confidential before it is released to the public – we never trade on this information, and we do not share it with anyone else, even close friends or family. For further information, please see our Insider Policy.

## **11 EXTERNAL COMMUNICATIONS: CHECK WITH THE RIGHT PEOPLE**

You should not answer investor's, journalists', or other external parties' questions about Remedy unless it is your specific job to do so. If you are contacted by investors or securities analysts, you should decline to comment and give them the contact details of our IR function. Likewise, if you are contacted by game news media, please be in contact with our Communications Director.

## **12 THINK TWICE ON SOCIAL MEDIA**

Before you write something about Remedy on social media, make sure you follow our Social Media Guidance. In summary, think twice before you post, keep Remedy's reputation in mind and use common sense.

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<sup>2</sup> However, no conflict exists if you own a non-significant number of shares in a publicly traded company.

<sup>3</sup> Common examples of confidential information include information about a new game, trade secrets, source or object code, financial information and business plans, salary, and personnel information as well as internal metrics.

**13 RAISING ISSUES AND CONCERNS RELATING TO THE CODE; SANCTIONS**

If you believe there has been a violation of this Code, you have a responsibility to report it. You may bring any concerns you have to the HR Department, the legal department, or your supervisor.

For certain types of issues, Remedy has a whistleblowing channel in place. If your issue has to do with these types of matters, please observe the process set out in our Whistleblowing Policy.

All reports concerning violations of this Code will be investigated promptly by the HR Department. Anyone violating this Code will be subject to disciplinary actions, which may include termination of employment or reporting the violation to authorities.