



Työllisyysrahasto

Sysselsättningsfonden | Employment Fund

# Code of Conduct

Summary of the Code of Conduct for Fund employees document

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## 1 Employment Fund's main duties are determined in an act and decrees

Employment Fund's main duties are based on the Act on the Financing of Unemployment Benefits and the Government Decree on the Rules of Procedure of Employment Fund. Other legislation (e.g. Employment Contracts Act and the Act on Adult Education Benefits) also contains provisions on the Fund's duties.

Employment Fund collects unemployment insurance contributions which are used e.g. to fund earnings-related unemployment security and to promote the development of employees' competence through adult education benefits. Employment Fund is an important part of the Finnish social security system, and its customers are all employers that provide employment as well as employees aged 18-64 in Finland.

We operate in the administrative branch of the Ministry of Social Affairs and Health. Employment Fund is an independent institution managed by labour market parties and supervised by the Finnish Financial Supervisory Authority.

Our operations are based on our shared values.



## 2 We comply with the law and internal guidelines

In all our activities, we comply with national legislation, EU regulation and, where applicable, international legislation. Everyone working in the Fund must also follow our internal guidelines and participate in separately defined internal training. In addition to our general guidelines, please also familiarise yourself with the more detailed guidelines for your specific tasks.

We comply with the principles of good governance and openness in our operations. We ensure the equality and legal protection of our customers.

We contribute to preventing the grey economy. We comply with national and international sanctions regulations.

Each Fund employee is responsible to act correctly and to comply with laws, regulations and guidelines. Failure to comply with laws and regulations may have serious legal, financial and reputational consequences.



### 3 We prevent bribery and corruption

We do not accept bribery or corruption in any form whatsoever. We ensure that our activities are objective and transparent.

We do not request, accept, or give any gifts of more than minor value or hospitality that goes beyond reasonable limits. We never accept or offer any gifts or hospitality that could undermine public trust in us, our employees or our stakeholders, or damage the reputation of Employment Fund. It is prohibited to ask, accept or give any gifts or hospitality that could affect decision-making or appear to do so from a third-party perspective.

We exercise moderation in representing ourselves. We do not accept or offer gifts or hospitality repeatedly to the same persons or organisations. Any acceptable gifts or hospitality are given and received openly.

Participation in events organised and paid for by our stakeholders (hospitality) is acceptable if there is a genuine reason relevant to our operations for participation that is acceptable and documented. However, during an ongoing tendering process, we do not accept any hospitality, gifts or other benefits from a party that is or may be involved in the tendering process.



## 4 We identify and prevent conflicts of interest

A conflict of interest refers to a situation in which there might be a conflict between personal direct or indirect interests and the interests of Employment Fund or our customers. The Fund follows the disqualification criteria defined for us, which allow us to avoid situations where conflict of interest may arise.

We comply with the disqualification provisions of the Administrative Procedure Act and Employment Fund's guidelines on the circle of acquaintances and avoid dangerous work combinations. We do not participate in the processing or decision-making of matters that concern us or people close to us that could bring gain or loss to us or people close to us. We promote impartiality in all our tasks. We will disqualify ourselves from tasks where our disqualification is open to interpretation and an external examination could lead to a suspicion of the impartiality of Employment Fund.

We comply with Employment Fund's own insider guidelines in both work tasks and personal securities trading



## 5 We comply with the Act on Public Procurement and Concession Contracts and internal guidelines

We comply with the provisions of the Act on Public Procurement and Concession Contracts and more detailed internal instructions concerning the Fund's procurement.

We require our contractual partners to commit to our separate ethical principles for suppliers.

We pay particular attention to gift and hospitality guidelines in the procurement of Employment Fund. The parties involved in preparing the procurement, the parties sending and receiving the invitation to tender, the parties presenting the procurement and the parties making the decision on the procurement may not accept or offer any gifts or hospitality from a party that is or may be involved in the tendering process.



## 6 We act openly and transparently, taking confidentiality obligations into account

Employment Fund's activities are governed by the Act on the Openness of Government Activities ('Openness Act') to the extent that Employment Fund exercises public authority.

Our documents are internal (intended for the Fund's personnel) or public unless separate provisions have been laid down on the confidentiality of documents and information. However, it should be noted that in our operations, several documents and information are confidential under the Act on the Openness of Government Activities or special legislation. We also remember that the confidentiality obligation and prohibition of use continue after the termination of the employment relationship.

Everyone is responsible for ensuring the secrecy of information pertaining to the activities of Employment Fund. We process all data in accordance with the Act on the Openness of Government Activities, the Financing Act, data protection legislation and Employment Fund guidelines. Employees, elected officials or other stakeholders may not disclose personal data or any information related to the activities of Employment Fund without a legal right or obligation.





## 7 We ensure data protection, data security and information management

We understand that data protection is a fundamental right and everyone has the right to the protection of their personal data. We process personal data in accordance with legislation in a reasonable and transparent manner and with the legal basis laid down in the law. We only process the data to the extent and duration necessary for each purpose. We ensure the secure processing of personal data.

In addition to legislation, we comply with Employment Fund's data protection principles and internal data protection guidelines.

With regard to information security, we strive to follow the industry-best practices and the principles of information security of Employment Fund.

Employment Fund owns the data contained by data resources produced as a result of its operations. We process and manage the data in our possession in an appropriate, reliable and responsible manner throughout the data life cycle.

In addition to legislation, we also comply with Employment Funds principles and guidelines of information management. On Employment Fund's external website, we provide instructions on information requests under the Act on the Openness of Government Activities and the EU's General Data Protection Regulation.



## 8 We use Employment Fund's assets appropriately

We use Employment Fund's assets appropriately. We understand that the assets and rights of Employment Fund are intended for use by Employment Fund. In using and storing the assets of Employment Fund, we make sure that they will not get damaged or lost or end up in the possession of third parties. We protect the rights of Employment Fund and also respect the rights of others, and we do not allow the illegal use of other assets or rights in our activities.



## 9 We look after one another

We contribute to building a culture that takes everyone into account and value each other's expertise. We comply with the principle of equal treatment in all employment relationships. We do not discriminate against anyone on the basis of age, origin, gender, nationality, language, religion, conviction, opinion, political activity, trade union activity, family relations, health, disability, sexual orientation or any other personal reason.

We do not accept inappropriate treatment, harassment or bullying in our work community.

We respect human rights as defined in the UN Declaration on Human Rights and workers' rights as defined in the ILO Convention. We do not allow child labour or forced labour.



## 10 Employment Fund does not participate in or support political activities

Employment Fund is a non-political organisation, i.e. we do not participate in or support political activities as an organisation. We provide information equally for the use of society and decision-makers from an implementation perspective.

The above does not restrict the freedom of expression or freedom of association of the elected representatives or employees of the Fund. However, we require caution on social media, for example. Any opinions must be presented clearly in the employee's own name, and no internal or secret information pertaining to the Fund obtained at work may be used for personal purposes.





## 11 We want to act right and report any suspected abuse

We want to act right and encourage everyone to raise questions and concerns. By preventing and responding to abuse, we provide Employment Fund with financial security, but also influence the reputation of Employment Fund and the trust of the personnel in Employment Fund as an employer. We take all violations, abuses and other inappropriate behaviour seriously.

Each Fund employee is obliged to report violations of the ethical guidelines, the Fund's other guidelines or laws and regulations. Employees can submit reports with their name to their supervisor or management, or anonymously using the Fund's whistleblowing system.

The whistleblowing system is also available through Employment Fund's external website, which makes it possible to also report suspected abuses to stakeholders.





**Providing security for changes in working life**  
Employment Fund