



Epistemic is an AIF Licensed Investment Fund,
regulated under the Estonian Financial Supervision and Resolution Authority | FSA.

License # 14859134.

EPISTEMIC CODE OF CONDUCT

This is the code of conduct for Epistemic. At Epistemic we believe in fair treatment and an inclusive environment. And for that purpose, we have created this code of conduct to support what we believe to be fair treatment to everyone in our community.

This document lays out what is unacceptable behavior and defines the process for anyone to report concerning behavior.

SCOPE

We expect everyone associated with Epistemic to follow this code of conduct, including, but not limited to our team, other investment firms, mentors, entrepreneurs or businesses. This code of conduct applies to all settings associated with Epistemic including, but not limited to working at the office, work trips, work events, social outings, social media & email communication.

UNACCEPTABLE BEHAVIORS

CONTACT

Comments or behavior that treat a person less favorably. Includes but is not limited to:

- Racial or ethnic slurs
- Homophobic or transphobic comments or slurs
- Treating someone less favorably because of external factors such as age or sex
- Holding a compulsory meeting when an employee who must care for family can't attend
- Unwanted conduct related to a protected characteristic or sexual nature, with the purpose of violating the victim's dignity or creating a degrading, humiliating or offensive environment.
- This includes but is not limited to:
 - Bullying
 - Unwelcome touching or flirtation
 - Sexual or sexually suggestive comments, insults, metaphors or gestures
 - Unsolicited questions about marital status, relationship or sexual preferences

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Or anonymously **via our whistleblowing channel** (please see our whistleblowing policy) .

Knowingly making a false report alleging a breach of this code of conduct
Knowingly acting in a manner which is contrary to the spirit of this code of conduct
Discrimination Harassment
Other unacceptable behavior

We are members of FSA and comply to rules and recommendations.

We will seriously investigate any reported incidents and communicate to the person who reported the incident as soon as possible where applicable.

We have internal processes in place to handle all reports.

The actions we may take in response to a report include, but are not limited to:
nothing,

- i) a verbal or written warning,
- ii) removal from certain spaces or forums,
- iii) removal of responsibilities,
- iv) report to legal authorities,
- v) termination of arrangements with third parties.

MONITORING AND REVIEW

This code of conduct is reviewed from time to time by the Epistemic team.