

# Code of Conduct

## Ethical Guidelines for Employees

### 1. Introduction and Purpose

We are committed to complying with all applicable laws, regulations, and internal policies across all locations. We comply with all national labor laws and collective agreements in our areas of operation. This Code of Conduct applies to all employees, supervisors, management, and interns.

We uphold international standards, including:

- UN Declaration of Human Rights
- Convention on the Rights of the Child
- ILO Agreements
- OECD Guidelines for Multinational Enterprises
- ICC Charter for Sustainable Development and Anti-Corruption

### 2. Group Values and Principles

Our company's values and principles form the foundation for everything we do. They guide our decisions, shape our culture, and set the standard for how we interact with colleagues, customers, partners, and the wider community. By embracing these core values, we ensure that our actions reflect our commitment to ethical conduct, mutual respect, and continuous improvement.

#### Our Values:

- **Reliability:** We are honest and transparent in all areas of business.
- **Environmental Responsibility:** We operate according to the principles of circular economy and agroecology.
- **Innovation:** We continuously invest in the development of our products and services.
- **Growth Orientation:** We strive for leadership in all areas of our business.
- **Humanity:** We care for the well-being and motivation of our staff in their daily lives.

### **3. Laws and Regulations**

Adhering to laws, regulations, and internal policies is fundamental to maintaining trust and integrity in our operations. By upholding these standards, we protect our company, employees, and stakeholders from legal and ethical risks. Our commitment to compliance ensures that we conduct business responsibly and set a positive example within our industry.

#### **Objective:**

To ensure full compliance and prevent misconduct.

- All applicable laws, regulations, and internal policies are followed.
- Prohibited conduct includes bribery, corruption, money laundering, insider misuse, anti-competitive behavior, and other unethical acts.

**Target:** Zero confirmed incidents.

### **4. Guidelines for Specific Situations**

Maintaining honesty and transparency in all interactions is essential to the Group's reputation and success. These guidelines ensure employees act responsibly, avoid conflicts of interest, and follow ethical principles in professional situations.

The purpose of the following instructions is to ensure that every employee knows and follows the shared rules that support the Group companies' reputation as a reliable and responsible operator and prevent misconduct and unlawful situations.

#### **Working in External Organisations and Conducting Commercial Activities Outside the Company:**

- Employees must report and seek approval before accepting roles in external organisations if they could cause a conflict of interest.
- Employees wishing to engage in external commercial activities must obtain approval from their supervisor to ensure the activity does not conflict with the Group's duties or business. Permission must be given in writing, specifying what type of commercial activity is permitted.

#### **Gifts and Hospitality**

Gifts and hospitality offered or received must be reasonable and appropriate.

- The value of a single corporate gift may not exceed 100 euros per recipient.
- The total value of received gifts must not exceed 100 euros per year per partner.
- Gifts must be selected based on company policy, not personal preferences.
- Gifts must never influence or attempt to influence business decisions.

## **Use of Company Devices, Networks and Premises**

- Company devices, networks, and premises may not be used for illegal activities and must always be used according to company guidelines.
- They may not be used for personal business activities.

## **Political Activity**

Employees may not participate in political activity in the name of the company or as company representatives.

Employees may not make political donations in the company's name.

### **Target:**

- Zero confirmed cases.
- 100% of employees complete the Code of Conduct online training.

**Additional information:** Information Security Policy; Equality and NonDiscrimination Policy.-Discrimination Policy.

## **5. Workplace Behaviour**

Creating a positive workplace culture is essential to our success. We are dedicated to fostering an environment where everyone feels safe, respected, and included. By upholding high standards of behavior and supporting equal opportunities, we encourage all employees to thrive and contribute to a collaborative and ethical workplace.

### **Objective:**

- To promote a safe, respectful, and inclusive workplace.
- Colleagues, customers, and partners are treated openly and fairly.
- All forms of bullying, discrimination, retaliation, sexual harassment, and any mental or physical violence are strictly prohibited.
- Child labour, forced labour, and human trafficking are subject to zero tolerance.
- We promote ethical leadership and occupational safety.
- Freedom of association and collective bargaining rights are recognized and supported.
- We provide equal opportunities for career development and training.

### **Target:**

- 100% of employees receive training on the Equality Policy.
- Workplace accidents reduced by 50% by 2027.

**Additional information:** Equality and Non-Discrimination Policy.

## 6. Confidentiality and Information Handling

Protecting confidential information is essential to our company's reputation and success.

We are committed to handling all business-related and personal data with the utmost care, ensuring that sensitive information remains secure. By following best practices in information management and exercising caution in all communications, we protect our assets and maintain the trust of our stakeholders.

### **Objective:**

To protect company and personal information.

Employees must:

- Protect trade secrets, confidential business information, and personal data.
- Use company devices, email, and systems responsibly.
- Exercise caution in social media use and public statements.
- Never disclose confidential information in any context.

### **Target:**

- 100% of employees are trained in information security and data protection.
- No confirmed data breaches caused by violations of guidelines.

**Additional information:** Information Security Policy.

## 7. Conflicts of Interest and Independence

Maintaining objectivity and independence in our work is essential for trust and sound decision-making. We are committed to identifying and managing situations where personal interests may influence or appear to influence professional judgement.

### **Objective:**

Ensure decisions are made in the Group's best interest.

- Avoid situations where personal interests conflict with company interests (e.g., family relations, private business, competitors).
- Disclose any potential or actual conflicts of interest to management immediately.
- Employees must not use their position for personal gain.

### **Target:**

- 100% of employees trained in Code of Conduct training
- All conflicts of interest are reported and properly managed.

## 8. Environmental and Social Responsibility

Each employee plays a key role in protecting the environment and promoting social responsibility. Our daily actions support the company's commitment to sustainable development.

### Objective:

Integrate environmental and social responsibility into daily operations.

- We commit to environmental protection, resource efficiency, and preventing environmental harm.
- Employees are expected to support sustainability in daily practices (e.g., waste sorting, energy efficiency).
- All employees are responsible for adhering to product safety, hygiene, and quality assurance guidelines throughout production and service processes.
- We assess and report our environmental impacts annually in the sustainability report.

### Target:

- Energy consumption reduced by 6% by 2030.
- 100% of employees complete sustainability-related training.

**Additional information:** Environmental Policy, Safety Plan, Quality Manual.

## 9. Employee Obligations Regarding Employee Inventions

Employees must promptly report all inventions made at work to the employer in writing, provide all necessary information for evaluation, and maintain confidentiality during and after the handling process.

The employer evaluates the invention's usefulness and decides on any rights and protection measures. Compensation is paid to the inventor based on the invention's economic significance, according to applicable laws and company decisions.

**Additional information:** Employee Invention Guidelines.

## 10. Supplier and Partner responsibilities

Our responsibility extends beyond our own operations to our suppliers and partners. We expect all suppliers and business partners to follow the same ethical, environmental, and social responsibility standards we apply to ourselves.

**Objective:**

Ensure ethical, environmental, and social responsibility throughout the supply chain.

- Suppliers must comply with all applicable laws and Honkajoki Group's ethical principles.
- Human rights, fair working conditions, and environmental protection standards must be respected.
- Employees involved in procurement must ensure expectations are communicated and compliance is monitored.

**Target:**

- 100% of key suppliers have signed and comply with the Supplier Code of Conduct.
- Regular audits and assessments are conducted.

**Additional information:** Supplier Code of Conduct, Environmental Policy.

## 11. Reporting Misconduct and Consequences

We believe that a culture based on transparency and responsibility is essential for ethical business conduct. Every employee has a duty to intervene when witnessing or suspecting misconduct.

Reporting concerns through appropriate channels helps protect our workplace, uphold our values, and ensure fair and respectful treatment for everyone. Reports are always confidential, and no retaliation is permitted against good-faith reporters.

**Objective:**

To encourage open reporting and ensure accountability.

- Employees may report violations confidentially to their supervisor, the sustainability lead, HR, or through the harassment reporting channel.
- If an employee believes they are being discriminated against after making a report, they may use the whistleblowing channel.
- The whistleblowing channel can be used for reporting serious violations of laws or company guidelines (e.g., procurement, financial services, product safety, environmental protection, animal health and welfare, public health, privacy, information security).
- Reporters are protected from retaliation. Serious cases may be forwarded to authorities.

**Target:**

- 100% of employees informed of reporting procedures
- All reports investigated within the set timeframe.

**Additional Information:** Whistle blow policy

## 12. Leadership and Accountability

Strong ethical leadership provides the foundation for the entire organization's activities. Supervisors and management are expected to lead by example and foster a culture where honesty and responsibility are part of everyday work.

Each employee shares responsibility for complying with the Code of Conduct to maintain a fair, respectful, and principled work environment.

Misconduct is always handled on a case-by-case basis. Group management makes internal decisions on consequences, which may include termination of employment. In cases of suspected legal violations, authorities may be notified.

No pressure or work-related difficulties justify violating these principles or concealing misconduct.

**Objective:**

Ensure ethical leadership and shared responsibility.

- Supervisors and management have a special responsibility to uphold and promote ethical culture.
- Management is responsible for investigating Code of Conduct violations and implementing corrective measures.
- Every employee is responsible for acting in accordance with this Code of Conduct.

**Target:**

- Annual evaluation of leadership performance regarding compliance with the Code of Conduct.

**Additional information:** Quality Manual.

## 13. Approval and Validity

Understanding and committing to the Code of Conduct is an essential part of working at Honkajoki Group. Every employee is required to read, understand, and commit to these guidelines as a condition of employment.

To ensure the guidance remains up-to-date and effective, the Code of Conduct is reviewed and updated annually based on feedback from management and personnel.

**Objective:**

To ensure awareness and commitment.

- Each employee must read, understand, and accept the Code of Conduct as part of employment.
- The management team reviews and updates the Code of Conduct annually, taking into account personnel feedback.
- The Code has been approved by the management team.

**Appendices**

Equality and Non-Discrimination Policy  
Environmental Policy  
Misconduct Reporting Policy  
Occupational Safety Action Plan  
Safety Plan  
Supplier Code of Conduct  
Quality Manual

**Distribution**

All Group employees

**HONKAJOKI®**