



**This is the Code of Conduct for the Terra Patris Group and its subsidiaries. The document is binding to our entire personnel, and everyone is expected to promote and adhere to it. Our operations comply with the laws and decrees applicable in Finland or the country in which the company or its subsidiaries and their representatives operate. We encourage reporting misconduct or violations directly within our organisation or through our whistleblowing channel.**

**Ensure the following before decision-making in an ethically uncertain situation:**

- Is it legal?
- Does it comply with our Code of Conduct?
- Am I providing a good example to others?
- How would this look if it were to become public in the media?
- What do my colleagues, friends or family think about this?

In an uncertain situation, we ensure the correct way to proceed with a supervisor or the CEO.



## REPORTING POSSIBLE MISCONDUCT



The Terra Patris Group and its subsidiaries do not tolerate any misconduct in their operations. We encourage everyone to raise concerns and questions related to compliance with rules openly within the organisation, discussing them openly and asking for advice when necessary. We encourage employees to speak directly to their supervisor or the CEO or alternatively use the whistleblowing channel.

The whistleblowing channel is intended for reporting misconduct. Reports can be submitted anonymously. When submitting a report, it is important to list all the facts related to the incident truthfully and provide evidence, if necessary. Once a report has been submitted, the person processing the matter will contact the submitter and request more information, where needed. If the investigation concludes that a violation has occurred, corrective and disciplinary measures may be imposed.

## SAFE AND HEALTHY WORKING CONDITIONS



The safety and well-being of our personnel is of utmost importance. It is our responsibility to halt all hazardous work tasks when such occurs, and it is the right and responsibility of each and every one of us to refuse to work in an unsafe manner. Every supervisor, subsidiary CEO and ultimately the group CEO is responsible for ensuring that we provide safe working conditions. We also share the responsibility for making sure that the work environment is safe for us, our colleagues, and our guests.

We adhere to the safety procedures related to our work by using all the requisite safety equipment, for example. Our supervisors understand their responsibility for being aware of all the applicable safety procedures and for observing them. We also provide notifications of hazardous conditions and safety events and take appropriate action to rectify these situations and learn from them.

## EQUALITY AND NON-DISCRIMINATION



We respect our colleagues and treat them as we would like to be treated. A diverse working environment is a resource and asset that can help us achieve excellent results. We all have the right to a work in an environment free from harassment.

All discrimination based on gender, gender identity, sexual orientation, race, religion, nationality, age, physical capability, or any similar aspect is unacceptable. We do not tolerate bullying, threats, discriminatory or hurtful speech, such as sexual, racial, or religious jokes, that may insult colleagues or create a hostile working environment. We encourage reporting all discrimination or harassment, including but not limited to sexual harassment, to a supervisor or through the whistleblowing channel.

## RESPECTING HUMAN RIGHTS



Human rights include the freedom of expression of thought, opinion, religion, and peaceful assembly as well as freedom from all forms of discrimination. Respecting human rights and labour rights is an essential part of our operations, and we are committed to observing all national and international laws related to human rights.

We are committed to ensuring that no forms of modern slavery, including forced labour and human trafficking, are present in our operations and supply chains. We do not condone the use of child labour. We respect the freedom of association of all employees. We expect third parties and our suppliers to respect human rights and labour rights pursuant to the applicable legislation.





## PRIVACY

We are committed to the collection and use of personal data in a lawful and transparent manner. We collect and use relevant data only for the purposes for which they are collected. We maintain the confidentiality and protection of all personal data. We take particular care to openly announce any discrepancies related to data security and take immediate remedial action in such cases.

We make sure that the personal data we use are up to date and never store unnecessary personal data. We only store personal data in our HR system and never on our own computers. We never share identifiable personal data through unsafe channels, including messaging applications. We report any instances of careless personal data processing through the organisation.



## ANTI-CORRUPTION MEASURES

Neither Terra Patris Oy nor its subsidiaries condone corruption, giving or accepting bribes, or money laundering. Any gift or benefit with the purpose of affecting the recipient's actions can be construed as a bribe.

Acts of corruption, such as bribery, are illegal and strictly prohibited. It is illegal to offer, promise or give anything of value for the purpose of gaining inappropriate benefit.

We carefully consider each case in which we offer a benefit of any value to a customer or stakeholder. Business-related hospitality must be reasonable and modest in value. We always ensure proper record keeping to describe our operations with reliability and accuracy. We take particular care when dealing with government officials.

## PREVENTING MONEY LAUNDERING AND TERRORIST FINANCING



Money laundering is an illegal process with the purpose of earning money through criminal activity masquerading as legal business. We object to all forms of money laundering and refuse to make any payments that may support money laundering, terrorist financing or similar activities.

To prevent money laundering and terrorist financing, we use reliable international business banks and do not accept direct cash payments from customers. We use accounts receivable factoring in our operations, which means that, in addition to us, our bank partners and the credit insurers also assess the reliability of our business partners and the origins of their financial assets.

We operate in accordance with robust and accurate bookkeeping processes to ensure the transparency and reliability of our financial activities. We register all events correctly in compliance with statutory obligations and bookkeeping practices. The utilisation of International Financial Reporting Standards contributes to the reliability and management of our operations.

## PRODUCT SAFETY AND CONFORMITY



Our safe and compliant high-quality products are at the core of our business operations. We undertake to observe the laws and decrees applicable to the safety of the machines and other products we manufacture, and to cooperate with safety authorities.

We strive to actively follow the development of product standards to ensure compliance at all times. We are committed to maintaining product safety at the core of our operations and actively monitor the development of requirements.





## ENVIRONMENT AND CLIMATE

We are committed to continuously improving our operations for the good of the environment across our entire value chain. We are committed to taking action to mitigate climate change and be open about the environmental impacts of our operations.

We take the environment and climate change into account in our decision-making and strive to consider it particularly regarding raw material procurement, product development and the environmental efficiency of our other operations. We are particularly vigilant when handling chemicals and hazardous materials and ensure that we operate in an environmentally sustainable manner, taking occupational safety into account.

We take special care to determine the environmental efficiency of our operations. We are committed to adhering to the appropriate environmental legislation.



## RESPONSIBLE PROCUREMENT

We are committed to taking sustainability into account as part of our procurement activities. We strive to continuously improve the financial efficiency, timeliness, and environmental sustainability of our procurement chain. We strive to cooperate with partners who are committed to high ethical principles and efforts to reduce environmental risks in their own operations. We monitor the development of compliance requirements and strive to improve our operations accordingly.

## COMPETITION LEGISLATION



We are committed to conducting business fairly and in compliance with competition legislation. We strive to support undistorted competition on the markets in all of our operations. When collaborating with competitors, we ensure that the cooperation does not restrict competition or seek to restrict it.

Illegal anti-competitive actions can manifest themselves in a variety of forms, such as questionable agreements, coordinated activities between competitors, adherence to an unofficial understanding or the misuse of a strong market position. We do not share commercially sensitive or strategic information related to operations such as pricing or production with our competitors. We stay vigilant in situations in which the nature of certain exclusive agreements, non-competition obligations and discount practices may restrict competition on the markets.

## PROTECTING THE REPUTATION OF THE COMPANY



All our employees represent their respective employer companies and the Group. We do not behave in ways that may damage the reputation or brand of the company. When representing the company outside of the workplace we strive to protect and strengthen its reputation. We conduct ourselves in an appropriate and responsible manner also on social media.