

# CODE OF CONDUCT INSTRUCTIONS

Lahden Talot (Company and Company Group) is committed to conducting its business in a sustainable manner and recognizes the long-term benefits this approach brings to the Company and its stakeholders. Lahden Talot strives to ensure that all stakeholders can trust that its operations are sustainable, and that its supply chain also operates in a responsible and sustainable way. As part of its commitment to sustainability, Lahden Talot complies with applicable laws and regulations across all areas of its operations and respects international conventions.

The Board of Directors approved this Code of Conduct on August 20, 2024. The Board may review and update the Code as necessary. If employees, stakeholders, or partners within the supply chain have any questions regarding the interpretation or implementation of the Code, they should contact the Company's CEO.

## INTRODUCTION

This Code of Conduct provides ethical principles for the Company's daily business operations. The principles of the Code offer a general framework that guides the Company's proper conduct and way of working. The Company expects every employee, including management, to adhere to these principles in their work and take personal responsibility for complying with this Code. The Code applies to the entire value chain of the Company, and the Company requires and expects all its suppliers, subcontractors, and business partners to operate sustainably based on these same principles.

## COMPLIANCE WITH LAWS AND REGULATIONS

Lahden Talot complies with applicable laws, trade regulations, and other legal requirements across all areas of its operations. Each employee of the Company is required to adhere to the laws and regulations applicable to its activities and their own work. All work within the Company is based on an employment relationship that is established in accordance with national laws and practices. All employees of the Company enter into employment contracts in Finnish, as the Company requires its employees to be proficient in spoken, written, and reading skills in Finnish.

Lahden Talot supports fair competition and does not tolerate unfair practices to win business. The Company competes within the framework of applicable competition laws. Employees of the Company must not engage in any illegal practices that restrict competition.

## RESPECT AND EQUAL TREATMENT

Lahden Talot adheres to and requires its employees and stakeholders to demonstrate respectful behavior in all interactions within the workplace, ensuring that everyone in the community respects each other's opinions and views, even when they differ from their own. This is achieved through active listening, not interrupting, and ensuring that others feel their thoughts are valued. Communication should avoid both verbal and written language that is offensive, demeaning, or discriminatory.

Lahden Talot respects all members of the community regardless of their background, including but not limited to gender, gender identity, sexual orientation, any physical limitations, race, ethnicity, religion, or age. The Company supports and encourages the participation of all and ensures that everyone has equal opportunities to be heard and to participate.

## INAPPROPRIATE BEHAVIOR

Lahden Talot has a zero-tolerance policy towards all forms of inappropriate behavior and is committed to creating a safe and respectful work and business environment for all its employees and stakeholders.

The Company encourages its employees to report unacceptable behavior and provides clear guidelines (Guidelines for Handling Conflicts and Inappropriate Behavior) on how and to whom reports should be made. Lahden Talot is committed to ensuring that all reported cases are investigated impartially and confidentially, and that deviations are addressed with appropriate corrective actions.

## TRANSPARENCY AND OPEN COMMUNICATION

Communication within the Company, as well as with stakeholders and authorities, must be open, transparent, and based on facts. However, in certain situations, other factors may limit such openness and transparency, such as considerations related to competition or the protection of confidential information.

## CONFIDENTIAL INFORMATION, DATA SECURITY, AND DATA PRIVACY

The Company strives to carefully protect and handle confidential materials and information. The Company also acknowledges the importance of safeguarding and handling confidential information when exchanging data with suppliers or stakeholders.

Employees must not disclose or use confidential information (e.g., trade secrets or confidential personal data) for the benefit of the employee or anyone other than the Company. Key suppliers and other stakeholders will, when necessary, sign a non-disclosure agreement (NDA) with the Company. The Company has established and follows guidelines and procedures related to data security and data privacy. Lahden Talot takes data security and

data privacy seriously and takes action to prevent any incidents of misuse related to these areas.

## CONFLICTS OF INTEREST

Employees are expected to demonstrate business loyalty to the Company. Employees must avoid any situations that may cause or lead to a conflict of interest between the Company and the employee, other stakeholders, their family members, relatives, or companies they control. Conflicts of interest can vary and encompass both financial and other personal interests.

## STAKEHOLDERS AND BUSINESS ENVIRONMENT

The Company operates fairly and collaboratively with its employees, customers, suppliers, and other stakeholders. This means that Lahden Talot respects its contractual obligations and business arrangements. The Company regularly reviews or assesses its business partners, suppliers, and stakeholders to ensure compliance.

Lahden Talot does not tolerate any form of forced labor, wage exploitation, involuntary labor, modern slavery, or the use of child labor. The Company does not tolerate discrimination in the workplace. These principles also apply to the employees and representatives of its stakeholders.

## ANTI-BRIBERY AND ANTI-CORRUPTION PRACTICES

The Company does not tolerate any form of corruption, including bribery. Employees must not accept, directly or indirectly, gifts, financial benefits, or other advantages or hospitality that could influence business decisions to promote or secure business. The Company adheres to its procurement guidelines and ethical principles regarding this matter.

## PREVENTION OF FRAUDULENT ACTIVITIES

All fraudulent behavior or activities are prohibited within the Company. Such violations are assessed internally and reported to the authorities if necessary.

## FINANCIAL INFORMATION

The Company's financial statements and financial communication are prepared accurately and in accordance with established procedures and legislation. Lahden Talot provides its owners and other stakeholders with truthful, complete, up-to-date, and accurate information about its business and operations.

## CONSEQUENCES AND ACTIONS

The Company will address any deviations from these guidelines with the seriousness they require in order to prevent inappropriate behavior, strengthen the values of the community, and promote a positive atmosphere.