

## Berner Group's Code of Conduct

This Code of Conduct is the basis for all of our operations at Berner Group. The ten principles included in the Code of Conduct concern our key duties and our commitment to operating responsibly as an organisation and as employees in every aspect of our day-to-day work.

At Berner, maintaining a high level of business ethics is the starting point for our operations. We want to act responsibly and do the right thing so that we can keep the trust of all our stakeholders.

Every Berner employee in every country we operate in is obligated to follow this Code of Conduct and its principles while working for Berner. Under this Code of Conduct, every Berner employee is also obligated to immediately report all suspicions or observations of inconsistencies with or violations of the Code of Conduct.

Our Code of Conduct represents our values, which are work, integrity and humanity. These values have guided Berner's operations since the late 19th century. Responsibility is an integral part of both our values and our business—we want to operate responsibly as well as promote responsibility.

If you have any questions about the Code of Conduct or how it should be interpreted, do not hesitate to contact your own supervisor or the senior management. You are always welcome to talk to me or another member of the management team.

For our partners, we have a separate Berner Group Code of Conduct for suppliers.

Each of us has the duty and the responsibility to follow the Code of Conduct. We want to do the right thing—in every situation.

Antti Korpiemi  
CEO  
Berner Ltd

## **1. We comply with good governance**

We consistently comply with all applicable laws in all our activities. We follow international standards, such as the ten principles of the Global Compact, core ILO Conventions and the Universal Declaration of Human Rights. We also expect all our business partners to comply with the law. We do not accept any breach of law or do we accept being a party to any breach of law. We aim at long-lasting, reliable and open business relationships with all our partners.

## **2. We respect human rights**

We are committed to respecting internationally recognized human rights in all our operations and promoting them in practice. We do not tolerate human rights violations in any form. We require, that all of our partners also respect all internationally recognized human rights and we do not tolerate any human rights violations in our supply-chain. We do not tolerate discrimination or harassment.

We treat our employees with dignity and treat everyone equally in recruitment, compensation, career progress and other personnel matters. Our employees are assessed based on their skills and competence. Bullying at work, sexual harassment of any kind and other forms of in-appropriate behavior is not tolerated or in any case accepted. We treat and serve all customers equally without discrimination.

## **3. We treat each other equally and respect labor rights**

We treat our employees equally and comply with applicable labor laws. We comply with the ILO Declaration on Fundamental Principles and Rights at Work and all other core ILO conventions. We do not accept any form of child labor, bonded labor or forced labor. Neither do we accept in this relation any other activity from any of our partners that contradicts national laws or international standards. We always comply with local work legislation and collective labor agreements. We respect our employees' freedom of association and the right to form trade unions.

We promote safety in all our business facilities and we make sure that all our employees and colleagues have a good and functioning work environment. We aim to prevent accidents and work-related injuries and to ensure the health of all our employees. Our partners must comply with all local labor laws and international human rights standards in relation to work safety requirements.

## **4. We don't accept bribery or corruption in any form**

Berner Group has zero tolerance towards all forms of bribery and complies with all international and national standards in relation to anti-corruption and bribery. We do not promise or pay bribes or any other forms of illegal payments to authorities or anyone else, or advice or incite to anyone to offer or accept them. We do not tolerate any form of money laundering

and we comply with all standards and regulations in relation to money-laundering, terrorist financing and any other illegal activities.

## **5. We compete in a fair way**

Our operations strive for fair and open competition and do not allow any illegal or restricting business methods. We do not take part in activities that hinder or in any way restrict fair competition. We comply with all applicable competition laws. All our employees are required to inform directly without delay of conditions which could be perceived as a conflict of interest.

## **6. We operate responsibly in relation to gifts and hospitality**

Any personal gifts or hospitality must be considered of little value, casual and common. The giving or accepting of a gift or hospitality cannot give rise to an explicit or implicit expectation of anything in return. Accepting a gift or hospitality cannot lead to any kind of relationship with dependency between the parties. We comply with all laws and standards issued on giving and accepting gifts and applicable standards are assessed in accordance with the legal requirements of each jurisdiction. All larger donations to charities and other non-governmental organizations are decided by the Board of Directors. We do not make any donations in cash.

## **7. We respect confidentiality**

We comply with the strictest rules and best practices of confidentiality regarding our personnel, customers and business partners. We also handle all trade secrets and other confidential information with the highest level of confidentiality and privacy. Customer information and personal data is strictly confidential, and we only collect required data. We comply with the General Data Protection Regulation and all other applicable laws in relation to confidential information. All our employees deal with confidential information with the highest level of care and ensure that such information is not given or end up with third parties.

## **8. We act responsibly and openly in communications and marketing**

We communicate with our stakeholders openly and transparently. We communicate commercially in a fair and open manner. We follow all marketing standards and comply with the Consumer Protection Act and all other good practices in consumer marketing. Marketing is always done truthfully, and we refrain from misleading statements.

## **9. We take care of the environment**

We consider the responsible management of issues related to the environment, health and safety to be an integral aspect of our business. Everyone at Berner has the possibility to act

in an environmentally sustainable and friendly way and to mitigate the effects of climate change. We wish to promote sustainable production and consumption by our employees and in our locations. All our employees are encouraged to attempt to act energy-efficiently, sort discarded materials properly and make environmentally friendly decisions on a daily basis. We continuously improve our operations and knowhow so that we can develop and manufacture high quality products that put less of a burden on the environment. Through our selection of raw materials we ensure that our products and processes are safe for both the user and the environment. We encourage and instruct our customers and consumers to use our products in an environmentally friendly way.

#### **10. We respond to violations of this Code of Conduct immediately**

All Berner employees are responsible for implementing and acting in compliance with this Code of Conduct. All Berner employees are responsible for reporting immediately any suspected or detected inconsistencies and violations of this Code. Suspected violations of the Code are investigated and resolved by Berner. We respond to all violations of this Code immediately and mitigate such violations effectively and in a timely fashion.

We encourage employees to contact a supervisor, the CFO, the CEO or the HR department if they have suspicions or have noticed something.

However, if you want to report your suspicions anonymously, you can do so using the external WhistleB communication channel (available in six languages): <https://report.whistleb.com/berner>.

The reporting process is encrypted and password-protected. An appointed team at Berner will respond to the reports. Our external stakeholders may also use the WhistleB channel to anonymously report their suspicions.