

March 2026

Berner Group's Code of Conduct

This Code of Conduct is the basis for all of our operations at Berner Group. The twelve 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 and promoting sustainable development 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.

For our suppliers, we have a separate Berner Group's Supplier Code of Conduct.

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 Korpiniemi
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, the Fundamental Principles and Rights at Work as defined by the International Labour Organization (ILO), United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

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 any form of discrimination, violence, harassment or bullying. No discrimination based on gender, religion, age, ethical or social background, disability, ethnic and national origin, union membership, political activity, sexual orientation, illness, race, or any other condition that could give rise to discrimination is allowed.

We treat our employees with respect and dignity and treat everyone equally in recruitment, compensation, career progress and other personnel matters. Our employees are assessed based on their skills and competence. We treat and serve all customers and business partners equally without discrimination.

3. We treat each other equally and respect labour rights

We treat our employees equally and comply with applicable labour 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 labour, bonded labour, indentured, trafficked, non-voluntary or forced labour. We do not accept young workers being subjected to work that is harmful for their health and development. 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 labour agreements. We respect our employees' freedom of association, the right to form trade unions and their right to bargain collectively. We respect international principles of responsible recruitment including the Employer Pays Principle. The Employer Pays Principle is commitment to ensure that the employer pays the costs of recruitment.

We are committed to the well-being of our employees and to treating them fairly. As part of this commitment, we ensure that all employees are paid at least a living wage. A living wage is a wage level that covers the basic needs of the employee and their family, such as housing, food, healthcare, education, and other necessities, and enables them to live a decent life. We do not accept any deviation from this principle, whether from ourselves or any of our partners. We continuously ensure that wage levels remain adequate as local living costs evolve.

We comply with international principles on fair pay and responsible employment. We respect our employees' rights to a fair and equitable wage, and decisions on recruitment and remuneration are based on merit, including skills, responsibilities, experience, and education. We strive to provide flexible working conditions and are committed to building an inclusive work environment with equal opportunities and treatment.

4. We promote occupational health and safety

We comply with national occupational health and safety legislation. We strive to provide a safe and healthy workplace for all employees. 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 as well as access to tailored personnel protection equipment. We assess and identify potential and actual threats to the health and safety of workers, and we maintain records of all health and safety incidents in our business facilities. We aim to prevent and mitigate accidents and work-related injuries and to ensure the health of all our employees.

We ensure awareness about occupational health and safety regularly through training and communication. Our partners must comply with all local labour laws and international human rights standards in relation to work safety requirements.

5. We don't accept bribery or corruption in any form

Berner Group has zero tolerance towards all forms of bribery, corruption, extortion, and embezzlement, 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.

We provide awareness to our workers about our approach and measures against unethical behaviour and promote compliance within the company through training and communication. We transparently disclose about our activities, structure, and performance in accordance with applicable regulations and industry benchmark practices.

6. We do not accept fraudulent activity

We do not accept fraudulent activity in any circumstances. Any kind of dishonesty, fraud, embezzlement, stealing and other similar illegal or unethical acts are prohibited. Misrepresentation, manipulation and concealment of information, making false claims or knowingly misleading actions for one's own or a third party's benefit, or to the detriment of the Berner Group, its employees, stakeholders or a third party, are not permitted.

7. 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.

8. 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. More detailed instructions regarding gifts and hospitality can be found in our internal guidelines on gifts and hospitality.

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.

9. 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.

10. 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.

11. We take care of the environment

We comply with national environmental legislation. We consider the responsible management and prevention of issues related to the environment, health, and safety to be an integral aspect of our business. We continuously identify and decrease the environmental impacts of our operations. 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 daily.

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.

12. 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 or the management team if they have suspicions or have noticed something without any fear of retaliation.

However, if you want to report your suspicions anonymously, you can do so using the external WhistleB communication channel (available in eight languages):

<https://report.whistleb.com/berner>.

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

Disciplinary measures

Violation of this Code of Conduct will always result in appropriate disciplinary measures. The measures are determined based on the severity, recurrence, and circumstances of the violation, and may include, among others:

- a verbal or written reprimand,
- a written warning,
- reassignment of duties or responsibilities,
- termination of employment in serious or repeated cases.

Disciplinary measures are always carried out in accordance with national labour legislation and applicable collective agreements. Decisions on measures are made by the supervisor together with the HR department and, when necessary, legal counsel and senior management.

In serious cases, violation of this Code of Conduct may also lead to criminal liability under applicable criminal law. Berner will file a criminal report with the competent authority if there is a reasonable basis to suspect that the violation may constitute a criminal offence. The decision to file a criminal report is made by legal counsel together with the company's senior management. Filing a criminal report is independent of measures under labour legislation, and both processes may proceed simultaneously.

Berner Group is committed to handling all suspected violations fairly, consistently, and confidentially. Disciplinary measures apply to all Berner employees regardless of their position.

Targets related to ethics and responsible data governance

Legislation: No violations related to legislation during the sustainability programme period 2026–2028.

Corruption: We will expand internal corruption risk assessments to cover 100% of wholly owned subsidiaries by 2029 and all subsidiaries by 2031.

Conflicts of interest: We will train 100% of employees on conflicts of interest as part of Code of Conduct training by 2028.

Fraud: We will train 100% of employees on fraud-related topics as part of Code of Conduct training by 2028.

Money laundering: We will train 100% of employees on money laundering-related topics as part of Code of Conduct training by 2028.

Responsible data governance: We will expand Acceptable Use Policy and information security guideline documentation to cover 100% of wholly owned subsidiaries in 2027 and all subsidiaries in 2028.

Update responsibility and version history

Responsibility for updating the Code of Conduct lies with the Communications and Sustainability Director and Legal Counsel. The principles are reviewed at least once a year through Berner's quality management Quality First system and updated as necessary. Update needs may also be addressed in Berner Ltd's Sustainability Steering Group.

Version history	Approved by
03/2026	CEO
08/2024	Legal counsel
08/2023	CFO
11/2022	CFO
08/2019	CFO