



KATKO OY PARTNER CODE OF CONDUCT

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PURPOSE OF CODE OF CONDUCT

Responsible business practices are important for KATKO. KATKO acknowledges that acting responsibly also requires promoting responsible practices in the value chain. Therefore, KATKO requires responsible practices also from its business partners. The purpose of this Partner Code of Conduct is to set clear minimum standards for the ethical business practices, environmental liability, and social practices of KATKO's business partners. This Code of Conduct is of crucial importance in forming and maintaining business relationships. This Code of Conduct ensures that KATKO's business partners act in accordance with KATKO's values and business ethics.

This Code of Conduct applies to all entities that are contracting parties with KATKO, as well as to their subcontractors, suppliers, consultants, representatives and other third parties, in each case that offer services or provide products for such entities for the benefit of KATKO (subsequently referred to as "Partners"). The Partners shall comply with this Code of Conduct in their business. To promote responsible practices in the value chain, the Partners shall ensure that also their other suppliers and contracting parties comply with principles equivalent to those set out in this Code of Conduct.





COMPLYING WITH LAWS AND REGULATION



Complying with laws and regulation

The Partner shall comply with all applicable local, national and international laws and regulations and other applicable regulatory requirements. This Code of Conduct does not replace existing regulation, but rather provides minimum requirements that the Partner shall comply with. If it is not possible to comply with this Code of Conduct due to regulatory restrictions, the Partner shall comply with this Code of Conduct to the extent reasonably possible.

LABOUR AND HUMAN RIGHTS

Human Rights

The Partner shall respect, protect and promote all internationally recognized human rights, such as the human rights in UN and ILO covenants. The Partner shall treat its workers fairly. The Partner shall ensure the realization of the fundamental and human rights of its workers, such as security, equality and non-discrimination.

Child labour and forced labour

The Partner may not employ workers that are under 15 years old or younger than the minimum age for admission to employment set out in local law. Workers under the age of 18 may not work in conditions that may jeopardize their health, safety, development, or morals. The Partner shall ensure that people of under 18 years of age do not work at night and their working hours shall be organized so as to not interfere with their attendance at school or vocational training.

Mental or physical coercion, slavery, and human trafficking are strictly forbidden. In no circumstances may the Partner use forced labour, such as human trafficking, slavery, or debt bondage, nor use subcontractors or suppliers that make use of child labour or forced labour. The Partner shall ensure that work always is voluntary and may be terminated with reasonable notice.

Respect of human dignity

The Partner shall ensure that all workers are treated fairly and with respect and appreciation. The Partner shall guarantee that no worker is subjected to any kind of sexual, physical, or verbal harassment, violence, bullying, abuse, or intimidation. The Partner shall duly intervene in events of harassment or other mistreatment without delay, supporting the victim.

Working conditions and recruitment

The Partner shall in matters relating to employment relationships comply with all applicable regulation, industry standards, and good practices. The Partner shall thereby also comply with international labour standards, including the conventions of the International Labour Organization (ILO), in order to ensure ethical labour practices. Furthermore, the Partner is encouraged to be a flexible employer and to promote the well-being of its workers, including work-life balance.

The Partner shall comply with principles of fair recruitment in all its recruitments and therefore, among other things, bear all recruitment costs. Work shall be based on documented and legal employment relationships. All workers shall be given understandable and written contracts of employment. The Partner shall ensure that recruitment, employment and promotion situations are managed fairly and equally, based on the merits and skills of the relevant persons.

Salaries shall be in accordance with the minimum requirements set out in local laws and regulations and prevailing industry norms. The workers shall receive fair and timely paid compensation that shall guarantee a decent standard of living.

Working hours, including overtime, shall be in accordance with local laws and regulations, and workers shall not have to work unreasonably long or excessive working hours. The Partner shall offer all benefits guaranteed by regulation and ensure that workers are given sufficient rest times, including breaks, days off work, and holidays, in accordance with applicable labour regulation.

The Partner shall respect the freedom of association and the right to collective bargaining. The Partner shall therefore respect everyone's right to join or refrain from joining workers' associations and to participate in collective bargaining.



Health and safety

The Partner shall ensure the safety and well-being of its workers. The Partner shall offer a safe and healthy work environment and maintain it, including complying with occupational health and safety regulations. If the Partner organizes housing for its workers, also the living conditions must be safe, healthy, and adequate. The workers of the Partner may not be under the influence of alcohol or drugs during working hours. The Partner shall take action to prevent accidents and sicknesses at the workplace.



ENVIRONMENT



Environment

KATKO encourages the Partner to commit to environmental protection in its activities and to track and take action to reduce its carbon footprint. The Partner shall identify and strive to minimize the negative impacts of its business activities on climate and nature in the entire value chain.

The Partner shall strive to continuously lower its carbon footprint, for example by using renewable energy sources and by improving energy efficiency. The Partner is encouraged to set science-based emissions reduction targets. The Partner shall take into account and strive to minimize all negative environmental effects caused by its business activities and protect the environment and biodiversity by all reasonable means. Furthermore, the Partner shall use all resources efficiently and responsibly.

The Partner shall comply with all applicable environmental regulation and environmental permits. The business activities shall, among other things, comply with all applicable regulatory requirements regarding air and water emissions, hazardous and toxic substances, waste management, soil, and packaging materials.

ETHICAL BUSINESS PRACTICES



Ethical business practices and anti-corruption

KATKO strives to act in accordance with the highest ethical standards in its business, and expects the same from its Partners. The Partner shall act honestly and transparently in its business activities. Transparency maintains trust and enables others to ensure that responsible business conduct is followed. Such questionable practices should be avoided that could negatively impact the reputation of KATKO or its partners.

The Partner shall have zero tolerance for corruption. The Partner is liable to ensure that all business activities are carried out without undue influence, always in accordance with applicable anti-bribery and anti-corruption regulation. The Partner, including its individual worker or representative, may not under any circumstances request, accept, give, promise, or offer any kind of bribe, improper monetary or other incentives, either directly or indirectly through an intermediary. This prohibition covers all requested, accepted, given, promised, or offered benefits that are meant to ensure unfair business advantages or personal benefit.



Fair competition

KATKO's aim is to act fairly and competitively in its business, and KATKO expects that the Partner follows the same principles. The Partner shall comply with all applicable competition regulation.

Business competition should be fair and open. KATKO requires fair and ethical competition from the Partner, ensuring that all business decisions are taken independently and without undue influence. This means, among other things, that all agreements and practices that could limit free and fair competition are prohibited. The Partner shall not participate in price fixing, market sharing, manipulation of competitive bidding, or sharing of sensitive business information with competitors, or equivalent actions. All actions that distort or weaken competition circumstances, such as cartels or gaining unfair business advantages, are strictly prohibited. The Partner should also refrain from using its market positions to exploit or harm other companies or customers.

Non-compliance with competition regulations may have serious legal consequences and may damage the reputation of both the Partner and KATKO.



Conflicts of interests

KATKO's aim is that the Partners act in the best interests of the business cooperation and avoid any conflicts of interest that may negatively affect their ability to conduct business in a fair, objective, and ethical manner. A conflict of interest arises when personal benefits, commitments, or relationships may unduly affect business decisions or impair the objectivity of an individual or organization. Already the fact that a situation looks like a conflict of interest may be harmful.

A Partner should avoid situations in which the personal, financial, or other interests of its workers or other representatives conflict with the benefits of the business and KATKO. If an actual or potential conflict of interest arises, the Partner shall immediately inform KATKO thereof and request instructions for further action. Full transparency is essential for maintaining trust and taking objective business decisions.

Intellectual property rights and confidential information

The Partner shall respect the intellectual property rights of KATKO and others and only use them rightfully. The Partner shall ensure that the confidential information of KATKO and others remains confidential and not use or disclose confidential information without permission or legal grounds.

Data protection and information security

The Partner shall process personal data with due care and responsibly in accordance with applicable regulation, its contractual obligations, and good practices. The Partner shall respect the right of privacy and ensure sufficient information security that is required for responsible data management. This requires both technical and administrative actions.

Sanctions and export control

The Partner shall comply with all applicable sanctions and the Partner may not take actions that are non-compliant with sanctions. In addition, the Partner shall comply with all applicable export controls.

Stakeholder interaction

Responsible business conduct requires interaction with stakeholders. Every Partner has its own stakeholders, which may include for example local communities and other groups that are impacted by the Partner's business. The Partner is encouraged to identify its own stakeholders and cooperate with them, by listening to them and duly considering their expectations and concerns. Good cooperation with and support to the stakeholders also improve the opportunity to identify, prevent, minimize, and correct potential negative effects of the business on people and the environment in the entire value chain.

MONITORING AND REPORTING

Monitoring and reporting

In order to verify the compliance with this Code of Conduct, KATKO requires that the Partner actively monitors its own and its subcontractors', suppliers', consultants', representatives' and other relevant third parties' compliance with this Code of Conduct.

The Partner shall take into use internal processes and monitoring practices, in each case that are strong and adequate in relation to the size and risks of the business, with which this Code of Conduct is implemented and by which the compliance with the Code of Conduct in the Partner's business and supply chain is regularly evaluated. This includes for example communication to the workers of the principles of the Code of Conduct as well as organizing of necessary training.

KATKO shall immediately be notified of all identified events of non-compliance with the Code of Conduct. The Partner shall allow a suitable third party selected jointly by KATKO and the Partner to carry out on-site audits in order to verify compliance with this Code of Conduct. The findings of the audit will be reviewed jointly by KATKO and the target of the audit in order to correct any misunderstandings. The Partner shall upon request deliver to KATKO all reasonable information, including possible relevant documents and reports, required by KATKO in order to verify compliance with this Code of Conduct or that are needed for compliance with KATKO's potential statutory reporting obligations.

The Partner is encouraged to provide its workers and other relevant stakeholders with a secure, confidential, and easily accessible way to report concerns relating to events or practices that are ethically questionable, illegal or non-compliant with relevant rules (such as this Code of Conduct), without fear of retribution. The Partner shall ensure that adequate processes are in place in order to investigate and address these concerns in a timely manner and shall take corrective action in relation to all identified misconduct.

By open and transparent communication and furthering active monitoring, KATKO aims to promote ethical business conduct in the entire value chain.

For KATKO, this Code of Conduct is an important part of the business relationship and the agreement with the Partner. Non-compliance with the Code of Conduct may lead to consequences set out in the agreement.



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