

GRANO'S CODE OF ETHICS

Grano's operations and decision-making are steered by our code of ethics, our vision for the future and the values defined for our operations. These are further complemented by internal operating instructions.

We are committed to openness, honesty and integrity as well as compliance with all the laws, instructions issued by the authorities and regulations relevant to our business operations everywhere we operate. We respect the UN's Universal Declaration of Human Rights and take human rights into consideration in all operations that affect society and our personnel. Our personnel's labour conditions are compliant with the requirements set in international legislation and ILO conventions.

Our values provide a strong foundation for our operations. They both guide our actions and build our corporate culture. Our values are

- **Trust:** You can count on us. Always. We get the ball rolling immediately.
- **A superior service experience:** We work together, ensuring an exemplary service-minded attitude, and we are very proud of what we do.
- **Innovation:** We forge onward through joy, skill and courage.

Our vision is to be the leading provider of marketing and content services in Finland. This vision includes the goal of creating well-being in accordance with the principles of sustainable development. We are committed to working towards a sustainable future and as such, social responsibility is a part of the everyday work and decision-making of every employee. We wish to develop and sustain successful business operations and be an interesting business partner.

Social responsibility

A key part of social responsibility is our own personnel. We comply with our own personnel policy, valid labour legislation, collective agreements, the principles of the UN's Universal Declaration of Human Rights and the International Labour Organisation ILO's Declaration on Fundamental Principles and Rights at Work.

- We do not use forced or non-voluntary labour.
- We do not hire persons who are below the minimum working age defined in local legislation. Irrespective of the minimum working age, we do not hire people under the age of 16.
- We do not allow discrimination, threats or harassment related to religion, gender, nationality, ethnic background or race.
- Our working environment is safe and healthy, and we are committed to its continuous development.
- We respect our employees' right to organise and join labour unions in accordance with national legislation.
- We provide our personnel a way to confidentially report possible violations and
- misconduct.

For achieving our set objectives, we consider it crucial to work together with our skilled personnel in building a trustworthy and inspiring culture within the working community. We want to provide a safe working environment and invest in personnel well-being and learning. We treat every employee fairly and equally and respect everyone's personal value and privacy. We do not tolerate any kind of discrimination, threats or harassment.

The goal of our occupational safety and health operations is to ensure safe and healthy working conditions and support our employees in maintaining their working ability. Effective occupational

safety and health operations are systematic and based on the assessment of workplace hazards, collaboratively prepared plans and an action plan. We invest in preventive health care and encourage our employees to exercise. We also utilise an early support model, the aim of which is to ensure that we identify and take measures to rectify factors that affect working ability and workplace well-being at an early stage.

We want to promote workplace well-being and improve the quality of employment in our working community. Our management work is steered by the equal treatment of personnel and the promotion of equality. In our management, we also consider the differing situations, values and expectations of employees of different ages. We also promote the workplace skills of young people and students by offering traineeships and summer jobs for young people who are still considering their career choices whenever possible.

We consider it important that our personnel are highly qualified to carry out their duties in a responsible manner. We make sure that new employees are given an effective induction programme and we actively train our personnel. Training is a key part of our everyday work.

Business ethics

In our company, economic responsibility stands for continuous striving towards profitable operation. Profitable operation enables us to continuously develop ourselves in order to maintain the competitiveness of our business. It is also a prerequisite for being able to take care of our employees, carry out our obligations to society and other cooperation partners and take responsibility for the development of environmental issues.

- Our financial goals must be met by responsible and ethical means – while considering environmental and social responsibility.
- We compete fairly and honestly in compliance with competition law.
- We do not participate in cartels or discuss contract terms, prices or other matters related to competition with our competitors.
- We prohibit corruption and bribery in all our operations, and we do not accept services, goods, trips or anything else from any of our cooperation partners or suppliers that exceeds the limits of normal hospitality.

We uphold our company's reputation and success in competitive tendering through honest and open communications. We take business secrets and professional secrecy into account in all our communications, both internal and external. We protect our business secrets, property, brand and trademarks in all our operations. Our communications are handled by designated persons responsible.

Environmental responsibility

Our environmental goal is to economise the use of natural resources. We know our responsibilities when it comes to environmental issues and strive to continuously reduce our environmental impact.

- Grano's environmental operations are steered by our environmental policy and targets.
- Our environmental management system is ISO14001:2015 certified, and we follow the principles of continuous improvement in accordance with this standard.
- We comply with the requirements and criteria of the FSC, PEFC, the Nordic Ecolabel and the EU Ecolabel.

Our long-term goals include the improvement of energy and material efficiency and the reduction of the generation of mixed waste and emissions from vehicles. We favour environmentally aware suppliers and environmentally friendly or recyclable materials in the acquisition of materials. We encourage our customers to promote the circular economy by offering solutions designed for this purpose.

We maintain our personnel's environmental awareness so that everyone can recognise their own environmental impact and work towards reducing it. We believe that commitment to environmental values improves both employee satisfaction and the quality of our products and services.

Confidentiality and security of operations

Our success is dependent on our customers' and other interest groups' trust in us. This trust steers all our operations, which is also reflected in our values. We make sure that our operations are confidential in respect to our personnel, customers and other interest groups in everything we do.

The aim of Grano's security operations is to secure our operating environment and ensure that security is maintained throughout all areas of our company. The most essential security principle is that no information is conveyed to external parties, and that full confidentiality is maintained in all our customer relationships. Our objectives are to secure the integrity and accessibility of information and uninterrupted operations, and to make sure we all have a secure working environment. Our data security operations support our business activities, protect our company's reputation and ensure compliance with the security requirements defined by our customers and in legislation.

Cooperation with interest groups

In addition to the confidentiality of our operations, our success is steered by our capacity to serve and respond to the needs of our customers and other interest groups. We appreciate our longstanding customer relationships and want to treat our customers equally in compliance with competition law.

Our goal is to engage in long-term and systematic cooperation with our chosen suppliers while treating every prospective supplier fairly and equally. We appreciate innovation and the capacity to keep up with industry development through continuous renewal. Our procurement decisions are based on pre-established criteria, such as high quality, the ability to achieve agreed upon objectives, service ability, competitive pricing, environmental friendliness and other added value services. Additionally, we demand absolute confidentiality and commitment to equivalent ethical principles, the continuous improvement of environmental performance and compliance with the obligations imposed by the Act on the Contractor's Obligations and Liability when Work is Contracted Out from all of our suppliers.

Commitment to Grano's code of ethics and reports of violations or misconduct

Grano's personnel agree to comply with this code of ethics in their work. It is the responsibility of supervisors to make sure that the code of ethics is made available to employees and to go through the code with employees if necessary. The code of ethics is also available on Grano's intranet, and it is covered in the orientation programme for new employees.

As regards possible violations, we recommend that you primarily contact your supervisor to resolve the issue. Both employees and external interest groups can also submit reports via Grano's whistleblowing channel. The whistleblowing channel can be used to anonymously report suspected abuse and issues that violate our code of ethics, laws, regulations or good business practice. All submitted reports are processed confidentially by Grano's whistleblowing team, and all incidents are collectively reported to the senior management.