

Target audience: Atria personnel, public  
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# Atria Code of Conduct

**ATRIA**  
*Good food – better mood.*



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## The foundation for innovation and inspiring work

Atria's vision is to be the leading northern European food company. When the corporate culture is strong and responsible, the development of operations is successful and the everyday work is smooth. Atria's Code of Conduct support the company's vision-based future goals and help us achieve them. They outline the principles for our daily operations. When we are all aware of the common ways of working, our everyday decision-making - where everything is ultimately resolved - becomes faster and easier. This way, we can better meet the expectations of consumers and customers, as well as owners.

Atria's Code of Conduct reflects the corporate culture defined by the entire staff: Atria's Way of Working: "We are genuinely interested in customers and consumers, we produce quality, we are hungry for success and we are enthusiastic about our work."

By acting in accordance with these values and consistent operating principles, Atria can guide its practical activities towards sustainable development, new innovations and success.

Responsible business is profitable business.

**Kai Gyllström**  
CEO  
Atria Plc



# Introduction

*In our Code of Conduct, we emphasise basic ethical principles that we value and adhere to in our daily operations. These principles guide us to create responsible business and strengthen our corporate culture. The Code of Conduct is complemented by the company's policies and guidelines, which define and guide the behaviour that we require of all Atria employees.*

## **Atria is committed to the following international agreements and recommendations in its Code of Conduct:**

- The UN Global Compact initiative for the promotion of human rights, labour rights, environmental protection and the prevention of corruption. The initiative is also known as The Ten Principles.
- UN Universal Declaration of Human Rights and Convention on the Rights of the Child
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and core labour conventions.
- OECD Guidelines for Multinational Enterprises
- International Chamber of Commerce (ICC) Charter for Sustainable Development and ICC Anti-Bribery and Anti-Corruption Guidelines
- Business Social Compliance Initiative (BSCI) purchasing principles
- SBTi Science Based Targets initiative approved climate targets

# Putting policies into practice

*Atria Code of Conduct is the basic ethical principles for Atria's business operations approved by Atria Group's Board of Directors. Atria Group Management Team reviews the Code of Conduct and its complementary policies annually and presents any need for changes to the relevant approval body. Policies related to the company's governance are approved by Atria Group's Board of Directors and policies related to operative business functions are approved by the Group's CEO.*

## Atria Code of Conduct

- Basic ethical principles concerning Atria's business operations
- Approval by the Board of Directors

### Governance Policies

- Administrative principles and their implementation guidelines
- Approval by the Board of Directors

### Operational Policies

- Operational principles and their implementation guidelines
- Approval by the CEO of Atria Group

Atria Code of Conduct and the complementary policies are management tools that are put into practice by incorporating these policies into the management system and operational guidelines of the companies within the scope of application. The code and the policies are also made known within the company through internal communication and staff training.

Adherence to Atria Code of Conduct is in all our interests and shall be followed in all situations. It is an important part of the company culture, and compliance with the code is the responsibility of the entire work community. It is important for the employee to carefully familiarize themselves with the Code of Conduct and know where to find the material. It's good to seek advice if something about the content of the Code of Conduct or their compliance is unclear. Observed violations and grievances must be reported without delay.

The supervisor supports his or her team in understanding the Code and ensures that they are implemented in the daily practise. The Code shall be taken into account when setting targets for personnel. A supervisor must immediately address any detected violations or issues.

# We take care of our business

*We are hungry for success and we care about how it is achieved. Compliance with healthy and sustainable business practices, as well as applicable laws and regulations, lay the foundation for all of Atria's operations.*

## Competition

We are committed to fair and free competition. We conduct our business in compliance with the principles of fair competition and applicable legislation.

» **Competition policy**

## Anti-corruption and anti-bribery measures

We do not accept corruption or bribery in any form. We do not give or accept bribes or other unjust benefits to promote business or obtain financial gain.

» **Anti-corruption policy**

## Disclosure of information

We are committed to making responsible decisions in our business. We conduct our bookkeeping and public reporting in accordance with legislation applicable to listed companies and international financial reporting standards.

» **Disclosure policy**

» **Investment policy**

## Safeguarding the confidentiality of information

We are committed to protecting the trade secrets and other confidential information we receive in our work about the company's operations, personnel, customers and business partners. We handle confidential information in our possession with due care and in accordance with applicable law. By adhering to the security principles of information and cybersecurity, we ensure that confidential information in our possession or received is not unlawfully used or disclosed to third parties or companies.

» **Insider policy**

» **Information Security Policy**

» **GDPR Policy**

## Conflicts of interest

In accordance with our duty of loyalty, our employees must always act primarily in Atria's best interest. Employees shall avoid any personal activities and financial interests which might be in conflict with their

responsibilities to Atria. We do not accept employees seeking personal gain through misuse of their position.

» **Insider policy**

## Risk management

Risk management is an integral part of Atria's strategic process, business decision-making and operative processes. Extensive risk analysis helps us secure our business as we leverage the new opportunities generated by our business or the markets in which we operate.

» **Risk policy**

» **Decision-making policy**

# We care for our stakeholders

*Our strategy and actions are embodied in our day-to-day engagement with our stakeholders. We engage in dialogue with our stakeholders to better understand their interests and to take their wishes into account in our business.*

## Our people

Our employees are the most valuable asset to us at Atria: our success is due to the expertise and motivation of our employees. We ensure the safety, well-being, and competence development of our employees.

In the continuous improvement of our operations and working environment, we take into account the factors that affects the well-being of our personnel. Factors that enhance work well-being include a physically and mentally safe work environment, equal treatment of personnel, fair compensation for work, balance between work time and leisure time, and respect for fundamental human rights.

We are committed to providing a safe and healthy working environment for our people. We expect our people to follow our guidelines for well-being and safety.

We do not tolerate conduct that could be considered objectionable, humiliating, threatening or hostile towards a person or group. We intervene in all bullying and harassment without delay.

### »HR Policy

## Consumers and customers

We are committed to focusing on the needs of our consumers and customers in the fulfillment of our mission: "We create inspirational food for every occasion. Our success is based on inspired people and the most preferred brand."

We deliver quality in everything we do and consistently offer our consumers and customers value – reliability and quality, safe and sustainably produced products.

We are committed to providing our consumers and customers with relevant product information.

We value and maintain strong customer collaboration.

»Food safety, quality, nutrition and product sustainability policy

»Marketing and communications policy

»Trademark policy

## Atria's contract producers

Atria's primary production contract producers are important partners for us and one of Atria's key success factors. Our producers' success is important to us, and this's why we want to be the best partner for them. Together we can develop our chain's competitiveness, profitability, responsibility and transparency. We require our contract producers to commit to our Supplier Code of Conduct and production guidelines, which take into consideration the sustainability of production, including animal welfare, among other things.

»Atria Supplier Code of Conduct

»Animal welfare policy

## Shareholders

We adhere to internationally accepted principles of good governance in our operations. Our objective is to generate sustainable long-term financial value for the company's shareholders and provide them with truthful, up-to-date, and accurate information about our operations.

» **Treasury policy**

» **Disclosure policy**

» **Corporate Governance Code (Securities Market Association)**

## Value chain

We are committed to a fair and ethically sustainable way of operating in our business operations in relation to our business partners.

We require our partners to comply with all applicable laws, regulations and international commitments regarding their activities.

We operate with our most significant business partners based on written agreements. In the agreement, the business partner undertakes to comply with and contribute to our Supplier Code of Conduct. Cooperation with Atria also obligates our business partners to meet our requirements for the supply chain as well as the quality of products and services and the procedures concerning them.

We regularly evaluate and monitor the ability of our business partners to act according to the set requirements.

» **Atria Supplier Code of Conduct**

» **Sourcing policy**

» **Animal welfare policy**

## Human rights

We respect and commit to adhering internationally recognised human rights in all our operations and promoting their realisation throughout our value chain. We do not accept human rights violations in any form.

## Corporate responsibility

We contribute to the well-being of local communities primarily by providing jobs and paying taxes, but also by participating in development projects led by local communities or universities that support our business or strategic goals.

We engage in cooperation with authorities and public debate to promote sustainable food production and other initiatives relevant to our business. We are committed to fact-based, interactive, transparent and honest communication.

We do not represent the interests of political parties.

» **Marketing and communications policy**

» **Anti-corruption policy**



# We care for the environment

*We are aware of our environmental responsibility. We respect nature and we are committed to using natural resources sustainably and minimizing the environmental impact of our operations throughout the entire value chain.*

## **Prevention**

We are committed to a preventive approach to solving environmental challenges. This means that we identify and assess potential environmental risks and take measures to minimise them before they become significant problems.

## **Promoting environmental responsibility**

We are committed to the goals of international climate conferences and have set science-based SBTi emission reduction targets for our own operations and value chain. We continuously strive to improve our environmental performance and report openly on our environmental impact to our stakeholders. We also require our business partners to operate in an environmentally responsible way.

## **Support for the development of environmentally friendly technologies**

We support the development and implementation of environmentally friendly technologies. This means investing in research and development, cooperating with other companies and research institutes and supporting the deployment of environmentally friendly technologies. We also strive to share information and experiences on environmentally friendly technologies and best practices with our stakeholders.

» **Environmental policy**

» **Sourcing policy**

» **Atria Supplier Code of Conduct**



# Compliance

*The Code of Conduct and the supporting policies concern all employees of Atria Group companies in all business areas. It is our duty to always comply with legislation, these ethical principles, and the company's policies. We train our people to work in accordance with the Atria Code of Conduct.*

In case of doubt about the interpretation of the Atria Code of Conduct, our employees should contact their supervisor or the Legal Department. Our employees must immediately notify their supervisor if they suspect that the Atria Code of Conduct or its supporting policies have been breached or that the company's conduct has been unlawful.

Reports of suspected violations can also be made anonymously through **[Atria's Whistleblowing Channel \(atria.com\)](#)**

## **Investigation and consequences**

Atria investigates any reports concerning its operations either internally or with the help of an external party when necessary, to ensure the investigation's impartiality. Any breach of the Atria Code of Conduct has consequences, depending on the severity of the breach, such as additional training of personnel, but it is also possible to terminate employment.

» **Whistleblowing policy**

# ATRIA

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