Target audience: Suppliers and business partners, public **Approved:** Atria Plc The Board of Directors 16 September 2024

Atria Supplier Code of Conduct





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The foundation for innovation and inspiring work

The foundation for innovation and inspiring collaboration lies in the strength of our partnerships. Atria's vision is to be the leading northern European food company, and this goal is tied to the responsible culture we share with you, our suppliers.

The Atria Supplier Code of Conduct guides our shared future, making sure our actions align with the goals of our vision. It provides us with principles for our everyday operations. When we are all familiar with the common operating methods, our everyday decision-making – where we all ultimately make a difference – will become easier and faster. This will enable us to better meet the expectations of consumers and customers as well as our shareholders.

By working in line with common values set out in Supplier Code of Conduct, we can steer our business towards sustainable development, innovation, and success.

We build sustainable business together.

Kai Gyllström CEO

Atria Plc



Introduction

Atria's operations are affected by a globally changing environment and the expectations and requirements related to this environment. As a food company, our operations are also fundamentally related to people's daily lives. When creating the future, we must keep both aspects in mind. Sustainability in all our business operations is something that we need to take care of and to develop. For us sustainability is not just slogans and labels – it creates added value.

As sustainability is an integral part of our operations, we need to ensure that our value chain upstream operates sustainably as well. We are committed to a fair and ethically sustainable way of operating in our business operations in relation to our business partners such as suppliers, farmers, subcontractors, agents, service providers and other partners.

We require our partners to comply with all applicable laws, regulations, and international commitments regarding their own activities as well as the requirements set in this Supplier Code of Conduct of Atria. Furthermore, cooperation with Atria obliges partners to meet our requirements for product or service quality, procedures and the supply chain. Atria Supplier Code of Conduct is based on Atria's commitment to the following international agreements and recommendations. Commitment to these principles is also required of supply chain partners:

- 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 Organization (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.

We care about our business – Business ethics

Competition

We are committed to fair and free competition. Atria requires its business partners to conduct their business in compliance with the principles of fair competition and applicable competition law.

Anti-corruption and anti-bribery measures

Atria does not accept corruption or bribery in any form. Atria's business partner shall not give or accept bribes or other unjust benefits to promote business or obtain financial gain. Atria requires its business partners to comply with international anti-corruption conventions and in accordance with applicable law. Atria's business partners are not allowed to offer Atria's employees or other parties any gifts, hospitality, donations, or other benefits that could improperly influence business decisions or be considered bribes.

Safeguarding the confidentiality of information

Atria Plc, the parent company of the Atria Group, is listed on Nasdaq Helsinki Ltd. As a publicly traded company, Atria is bound by regulations concerning insider information. Atria's business partner must commit to protecting the Atria's trade secrets and other confidential information they receive about company's operations, personnel, customers and business partners. Business partner must manage confidential information in their possession with due care and by applicable law.

Conflicts of interest

Atria's business partners shall avoid situations with Atria's employees that may cause or appear to cause conflicts of interest in relation to Atria. A business partner must inform Atria of any potential conflicts of interest with the company before the start of the transaction.

Trade sanctions and export controls

Business partners must comply with all applicable trade sanctions and export control laws and regulations. In accordance with their due diligence, business partners are responsible for ensuring that operators in their supply chain also comply with these laws and regulations.

We care for the people in our supply chain

Human rights

At Atria 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. Atria also requires its business partners to respect these principles in all their operations and to promote them in practice. Human rights violations must not be tolerated in any form. This means that a business partner shall take action to remedy any adverse human rights impacts it may cause.

Child labour

Atria's business partners shall not tolerate child labour or violations to the rights of the child in its operations. Child labour is defined as work that is hazardous to a child's health and development. Usually, child labour interferes with a child's right to education and to play.

Atria's business partners shall respect the rights of children and abstain from directly or indirectly employing children below the minimum age for employment defined in international conventions. If local legislation or local regulations stipulate a higher age limit, this must be observed.

Forced labour

Atria does not engage in any form of forced, trafficked or other non-voluntary labour. This is also not tolerated in the operations of Atria's business partners. Forced labour includes modern slavery, human trafficking and bonded labour, characterised by two elements: threat of penalty and work or service undertaken involuntarily. Withholding employees' wages or identity documentation is forbidden.

Fair working relations

Atria's business partners shall comply with the requirements of applicable laws, rules and regulations concerning employees' working time and wages. Employees shall be hired based on documented contracts, which specify terms of employment in a language that the employees understand.

Business partners shall comply with applicable laws, international conventions, and industry standards regarding working hours and wages. All overtime hours shall be voluntary. Wage calculations shall be transparent, specifying compensation for overtime separately. Wages shall be paid on time at regular intervals and at least monthly. Atria's business partners shall not discriminate against applicants or employees based on their race, religion, gender identity, marital or family status, age, political affiliation, nationality, physical ability, sexual orientation, ethnicity or any other dimension of their identity.

Atria's suppliers and business partners shall respect their employees' right to freedom of association and right to collective bargaining.

Safe working conditions

We require our business partners to provide a healthy and safe working environment for their employees.

Business partners shall apply workplace risk assesment for all their workplaces and take all the necessary measures to eliminate or reduce identified risks. A routine for reporting, analysing, following up and acting on incidents and accidents shall be implemented. Employees shall be given the necessary and adequate introductory training to their work including relevant information on the health and safety aspects of their daily tasks.

Harassment and abuse shall not be tolerated in any form. Adequate routines for preventive and corrective actions against harassment and abuse and rules for disciplinary actions shall be implemented.

We care for our environment

At Atria, we are aware of our environmental responsibility. We respect nature and we are committed to using natural resources sustainably and minimizing the negative environmental impact of our operations throughout the entire value chain. Beside full legal compliance, we also require our business partners to operate in an environmentally responsible way as defined in the Global Compact sustainability principles for the environment.

Prevention

We require our business partners to take the necessary measures to protect the environment from degradation and commitment to a preventive approach to solving environmental challenges. This means that our business partners identify and assess potential environmental risks and take measures to minimise them before they become significant problems.

Promoting environmental responsibility

Business partners must commit to monitoring the environmental aspects relevant to their operations and to continuously improving the related performance. They shall evaluate the current environmental impacts such as land use, material, water and energy utilization of their production and operations and apply precautionary approach to environmental management involving the systematic application of risk assessment, risk management and risk communication.

Support for the development of environmentally friendly technologies

For Atria, supporting the development of environmentally friendly technologies 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.

We expect our business partners to promote their environmental responsibility and continuously improve their environmental performance by encouraging the development and diffusion of environmentally friendly technologies.

Compliance

Atria's business partners shall comply with the obligations described in this Atria Supplier Code of Conduct and communicate and train their employees on the content of it. Business partners can either directly use Atria Supplier Code of Conduct or establish and implement their own principles and policies with aligned content. Atria's business partners shall use all reasonable efforts to ensure that their sub-contractors and partners comply or exceed the requirements that are set for business partners in this Atria Supplier Code of Conduct.

Atria's business partners shall implement independent systems for their employees and possible other stakeholders to enable grievances regarding suspected violations of principles described in this Atria Supplier Code of Conduct. The system shall include reporting and management of the grievances as well as protection of the whistleblower. Additionally, the supplier must communicate to their employees the possibility to report misconduct through <u>Atria's Whistleblowing</u> <u>Channel (atria.com)</u>. When a business partner engages to business with Atria it undertakes to comply with and contribute to Atria Supplier Code of Conduct. It is also our duty to regularly evaluate and monitor the ability of our business partners to operate in accordance with the set requirements. We expect transparency and cooperation from our business partners in verifying our due diligence obligations.



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