

Atria Code of Conduct

ATRIA

Good food – better mood.



A basis for making the good even better

When you have a strong and responsible operating culture, you can develop operations successfully and enjoy smooth daily activities. The Atria Code of Conduct supports the company's future goals and helps us achieve them. It provides us with solutions 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.

The Atria Code of Conduct reflects the corporate culture shaped by the company's entire personnel – the Atria Way of Work: "We focus on consumers and customers, we deliver quality, we are hungry for success, and we enjoy our work."

By working in line with these values and the common Code of Conduct, Atria can steer its practical operations towards sustainable development and success.

Responsible business is profitable business.

Juha Gröhn
CEO
Atria Plc

Content

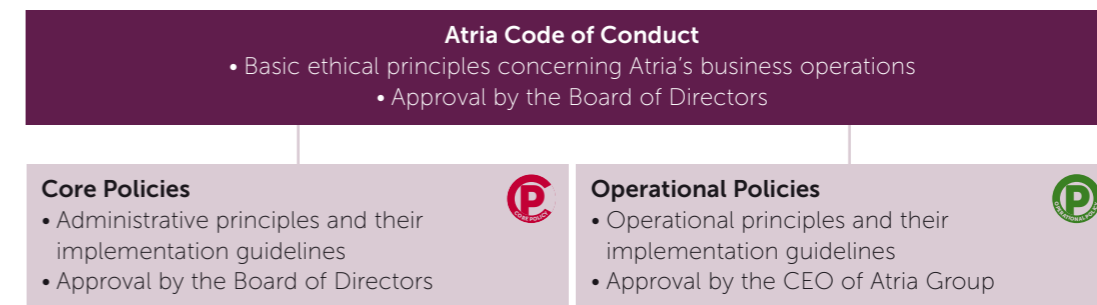
We take care of our business.....	4
We care for our stakeholders.....	6
We care for the environment.....	10
Compliance.....	10

Atria Code of Conduct

The Code of Conduct confirms the ethical principles we value and follow in our activities every day. The Code of Conduct is supported by the company's policies and guidelines, which define and guide the conduct we expect from all Atria employees.

In its Code of Conduct, Atria makes a commitment to the following international agreements and recommendations:

- UN Universal Declaration of Human Rights and Convention on the Rights of the Child
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Global Compact initiative for the promotion of universal principles in the areas of human rights, labour rights, environmental protection and anti-corruption
- OECD Guidelines for Multinational Enterprises
- ICC Business Charter for Sustainable Development and ICC Rules on Combating Corruption
- BSCI Responsible Purchasing Practices



Approval: The Code of Conduct is approved by Atria Group's Board of Directors. The document is reviewed annually by Atria's corporate responsibility team, which proposes any necessary changes to Atria Group's Management Team and Board of Directors for approval.

Approval date: 28 April 2021.

Audience: Atria's personnel, public

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 believe in fair and open competition. We conduct our business in compliance with the principles of fair competition and applicable legislation.

» [Competition policy](#)

Anti-bribery measures

We do not accept any kind of bribery in our operations. We do not give or accept bribes or any other improper advantages for business or financial gain.

» [Anti-corruption policy](#)

Disclosure of information

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

» [Disclosure policy](#)
» [Investment policy](#)

Confidential information

We recognise the importance of protecting our business secrets and we respect the confidential information of others, including competitors, suppliers and customers. We process personal data according to applicable legislation. We ensure that the confidential information we possess or receive is not illegally used, or disclosed to unauthorised people or companies.

» [Insider policy](#)
» [Information security policy](#)
» [GDPR policy](#)

Conflicts of interest

We expect our employees to be loyal to Atria in all their actions. We expect employees to 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](#)
» [HR 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 exploit the 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 aspirations into account in our business.

Our people

We recognise that our people are the company's most important asset, and that our success relies on their skills and motivation. That is why we take care of the safety, well-being and development of our people.



We believe that well-being is created in a working environment that is safe both physically and mentally, with fair remuneration and working hours that allow a healthy work-life balance and in which fundamental human rights are respected. We provide a safe and healthy working environment for our people. This is why we also require our people to adhere to the instructions that are intended for their well-being and safety.

We respect and support internationally recognised human rights principles and promote their implementation in all our business areas.

» HR policy 

Producers

Atria's Finnish meat producers are important partners for us and one of Atria's key success factors. Our producers' success is important for us and this is 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 producers to commit to our Code of Conduct and production guidelines, which take into consideration procedures related to animal welfare, among other things.

» Atria Supplier Code of Conduct 
» Animal Welfare Policy 




Consumers and customers

We are committed to focusing on the needs of our consumers and customers in the fulfilment of our vision: "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, and safe products.



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

We value and maintain strong customer collaboration.

» Food safety, quality and nutritional policy 
» Marketing and communications policy 
» Trademark policy 

Shareholders

We are committed to conducting our operations in accordance with internationally recognised principles of good corporate governance. 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 
» Finnish Corporate Governance Code (Securities Market Association)



Suppliers and other business partners

We are committed to establishing mutually beneficial relations with our business partners.

We require our business partners to comply with local legislation and applicable international standards, and to follow the ethical principles set out in the Atria 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.

- » [Atria Supplier Code of Conduct](#) ⓘ
- » [Sourcing policy](#) ⓘ
- » [Animal welfare policy](#) ⓘ
- » [Transfer pricing policy](#) ⓘ

Public activities

We contribute positively to the well-being of local communities, primarily by offering jobs and paying taxes but also by participating in development projects run by local communities.

Our objective is to promote and defend our legitimate business interests. We maintain good cooperation with authorities and organisations in the development of legislation and other regulations. We do not promote the interests of political parties.

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




- » [Marketing and communications policy](#) ⓘ
- » [Anti-corruption policy](#) ⓘ



We care for the environment

We recognise our responsibility in respecting the environment and using natural resources sustainably in all phases of food production and consumption. We are committed to the continuous improvement of our environmental performance throughout our value chain.

We network with experts to promote environmental protection, increase understanding of environmental issues and promote good practices. We also require our partners to operate in an environmentally responsible way.

- » 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. 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 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.

Suspected breaches may also be reported anonymously according to Atria's Whistleblowing policy at <https://report.whistleb.com/atria>.

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.

- » Whistleblowing policy 



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