Atria Supplier Code of Conduct



## Introduction

Atria's business is affected by the changing global environment and related expectations and requirements. As a food company, our operations are also fundamentally related to people's everyday lives. We must keep both of these aspects in mind while forging the future. Responsibility in all our business operations is a matter we must care for and develop. For us, responsibility is not only rhetoric, nor is it speech only reserved for special occasions. Rather, responsibility brings added value.

As sustainable development is an integral part of our operations, we need to ensure that the operation of our entire value chain is sustainable. We are committed to establishing relations with our business partners – suppliers, farmers, subcontractors, representatives, service providers and other partners – that are beneficial to both parties. We expect our business partners to comply with the applicable laws, rules and regulations in their countries of operation, as well as internationally recognised standards and the requirements set forth in this Atria Supplier Code of Conduct. Cooperation with Atria also obligates our business partners to meet our requirements for the quality of products and services, procedures and the supply chain.

We are committed to the OECD Guidelines for Multinational Enterprises (MNEs), the UN Guiding Principles on Business and Human Rights (UNGB), and the UN Global Compact initiative.

**Approval:** The Atria Supplier Code of Conduct is approved by Atria Group's Board of Directors. Atria's corporate responsibility steering group reviews the document annually.

Date of approval: 24 January 2023

Audience: Suppliers and business partners, public

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## We care for our business: our business ethics

#### Competition

We believe in fair and open competition. Atria requires its business partners to conduct their business operations in accordance with the principles of fair competition and the applicable laws.

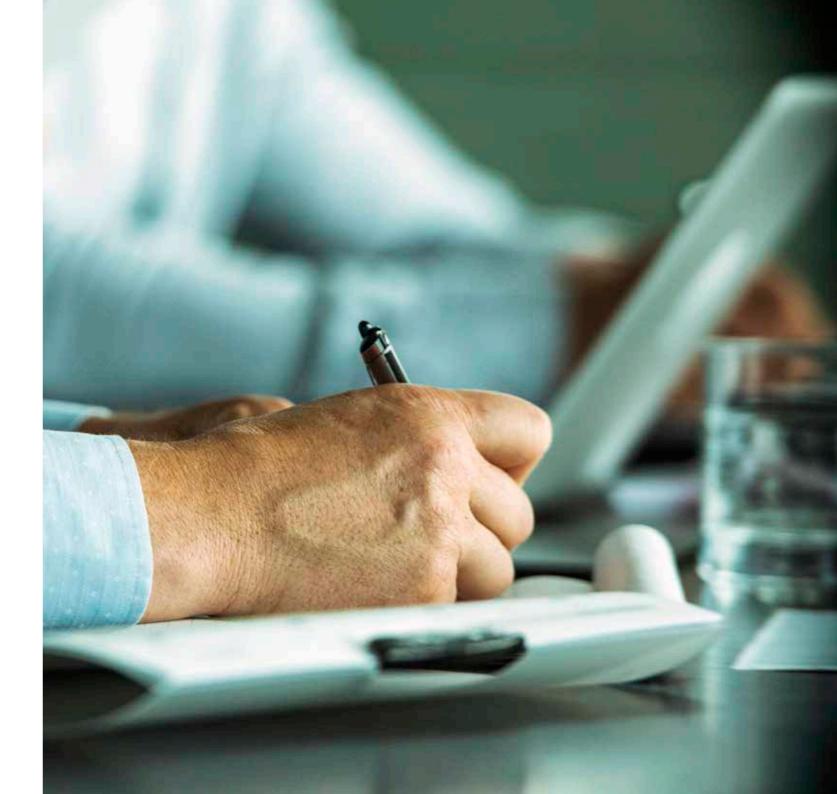
#### Transparency and confidentiality

Atria Plc, Atria Group's parent company, is listed on Nasdaq Helsinki Ltd. As a listed company, Atria is bound by the regulations concerning insider information. Atria requires its business partners to keep any confidential information disclosed to them secret and to not disclose confidential information to any third parties.

#### Anti-corruption measures

Atria has zero tolerance for any kind of corruption, blackmail, embezzlement or bribery. This also applies to the operations of Atria's business partners. Atria requires its business partners to abide by international anti-corruption treaties, such as the United Nations Convention against Corruption, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and the instructions against bribery and corruption of the International Chamber of Commerce (ICC).

Atria's business partners shall not offer any gifts, hospitality, financial aid or other benefits that could inappropriately influence business decisions or be considered bribes. Atria's business partners shall not reward or offer rewards to Atria's employees, representatives or subcontractors for signing a contract or making a request for quote for products or services.



## We care for the people in our supply chain

#### Human rights

Atria is committed to respecting internationally recognised human rights, as defined in the Universal Declaration of Human Rights (United Nations 1948). Atria requires its business partners to respect these principles in every aspect of their operations and to promote them in practice. Violations of human rights in any form shall not be tolerated.

#### Child labour

With regard to the minimum age of employees, Atria observes the minimum age for admission to employment as defined in the Convention on the Rights of the Child (UN 1989) and the ILO Conventions 138 and 182 (ILO 1973). In addition, any employment age-related restrictions in local legislation must be followed. If the local legislation or local regulations stipulate a higher minimum age, the requirement must be complied with. Atria's business partners shall not tolerate child labour or any violations of the rights of the child in their operations, as defined in the abovementioned conventions.

#### Forced labour

Atria does not engage in any kind of forced labour, human trafficking or voluntary work, as defined in the ILO Forced Labour Convention (no. 29). Atria expects also its business partners to follow the ILO Abolition of Forced Labour Convention (no. 105) in their operations.

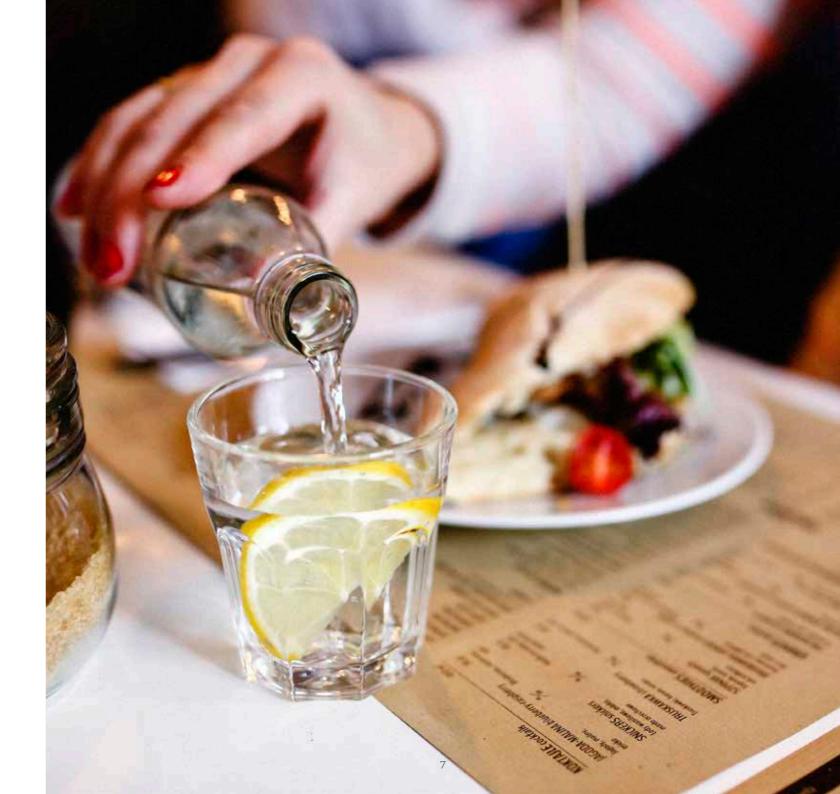
#### Fair employment relationships

Atria's business partners shall comply with the applicable law, rules and regulations related to working time and salary of employees. The hiring of employees shall be based on documented contracts which define the terms of the employment relationship in a language understandable to the employees. Working time and salaries shall be in accordance with the ILO Convention no. 100. Working overtime shall always be voluntary. Payslips shall be transparent and they shall include a separate breakdown of overtime payment. Salaries shall be paid in time, at regular intervals (at least once a month).

Atria's business partners shall ensure that any potential practices related to temporary employment and the processes carried out during the employment relationship are in accordance with the ILO Discrimination Convention (no. 111). They shall not discriminate against applicants or employees on the basis of race, religion, gender identity, marital or family status, age, political affiliation, nationality, physical abilities, sexual orientation, ethnic origin or other identity traits. Atria requires its business partners to respect their employees' right to freedom of association, in accordance with the ILO Freedom of Association Conventions (nos. 87, 98 and 135).

#### Safe working conditions

Atria requires its business partners to offer their employees a healthy and safe working environment in accordance with the ILO Occupational Safety and Health Convention (no. 155). Business partners shall conduct a workplace risk assessment in all work sites and take all the necessary measures to remove or reduce any risks identified. Employees must be provided with the necessary and adequate induction into their work, including the information relevant to the health and safety aspects of their daily tasks. Business partners shall have in place the necessary management procedures for reporting, analysing, monitoring and reacting to events and accidents. Any form of harassment or pestering shall not be tolerated. Atria's business partners shall ensure that the preventive and corrective measures against harassment and pestering as well as any disciplinary procedures are appropriately implemented.



## We care for the environment

Atria recognises its environmental responsibility. We respect the environment and use natural resources sustainably in all phases of food production and consumption.

We strive to reduce the carbon footprint of our products, and our goal is a carbon-neutral Atria by 2035. We have joined the food industry material efficiency commitment, which aims to reduce the environmental impact of food production, distribution and consumption; we are also committed to increasing our energy efficiency, following our adherence to the energy efficiency agreement.

We are committed to the continuous improvement of our environmental performance throughout our value chain and to taking action to protect the environment. In addition to complying with environmental legislation, we require our business partners to operate in an environmentally responsible way, as defined in the principles of the UN Global Compact framework.

We require our business partners to implement the necessary measures to protect the environment from damage. Our business partners shall assess their current environmental impact, such as land use and the utilisation of materials, water and energy in their production processes and operations. Atria expects systematic management of environmental issues, including systematic risk assessment, risk management and risk communication. We expect our business partners to improve their environmental responsibility and to continuously enhance their level of environmental protection by promoting the development and implementation of sustainable technology.



# Bearing responsibility for complying with the Atria Supplier Code of Conduct

It is important for Atria that the entire supply chain operates responsibly, as defined in the Supplier Code of Conduct. Atria's business partners shall inform their employees of the rights and duties described in the Atria Supplier Code of Conduct. Atria's business partners shall take all the reasonable measures to ensure that their subcontractors and partners also comply with or exceed the required level of responsibility set forth in the Atria Supplier Code of Conduct.

Atria's business partners shall have in place a procedure for reporting malpractice that enables employees or other stakeholders to submit anonymous complaints in case of suspected breach of the requirements set forth in the Atria Supplier Code of Conduct or illegalities.



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