



BRUNBERG OY CODE OF CONDUCT

The Code of Conduct of Brunberg Oy applies to management, employees, business partners and parties concerned.

The Code of Conduct of Brunberg Oy is based on international agreements, declarations and standards, such as the UN United Nations Guiding Principles on Business and Human Rights, the conventions of the International Labour Organization, ILO, and the UN principles for sustainable development.

The essential parts of our activities are:

1. Comply with legislation

Brunberg complies with EU and Finnish laws and regulations and also requires all its partners to comply with all applicable national and international laws and standards. We assume that our employees are familiar with the regulations concerning employment and comply with the values and ethical principles of Brunberg in all their daily activities, independent of job assignments or terms of employment.

2. Respect human rights

We respect human rights in accordance with the UN basic principles and the conventions of the International Labour Organization (ILO). We do not accept child labour, forced labour or any other activity which violates human rights.

3. Ethical leadership

- Our values include being responsible and close.
- We assume that our directors and managers are role models in matters concerning ethical decision-making and daily activities.
- We improve the know-how of our employees and encourage wellbeing at work. Good leadership includes encouraging and maintaining an open and good working atmosphere as well as further developing the company's discussion culture.

4. Respect and diversity

- We treat our employees, customers and interest groups respectfully and equally, regardless of background, religion, race, gender, sexual orientation or other qualities.
- We do not accept any kind of physical, verbal, sexual or mental harassment, bullying or violation.

- We accept and respect the right of our employees to freedom of association and the right to collective bargaining.

5. Environmental responsibility

- In our business activities we take responsibility for the impact on the environment, community and interest groups.
- We are committed to sustainable development and strive to continually decrease our impact on the environment.
- The UN goal for sustainable development (Sustainable Development Goal, SDG) is a comprehensive and universal operational framework established by the UN in 2015. Brunberg has included the following goals in our sustainability program, as seen from our own activity's point of view.

No. 8: Decent work and economic growth

No. 12: Responsible consumption and production

No. 13: Climate action



6. Responsibilities of our business activity

- We conduct our business with honesty and transparency. Our employees and managers support open business, and we require full compliance with competition law.
- We do not accept bribery, corruption or fraud.
- We avoid conflicts of interest.
- Our whistle-blow channel is an anonymous channel for messages, where it is possible to report disrespectful treatment or suspected abuse within the business activity of Brunberg. With the help of this channel, we can improve the activity of the organisation, as we can intervene at an early stage.

7. Safe products

- Health and safety of the consumer: The health and safety of the consumer must primarily be taken into account when planning, producing and marketing our products which have to comply with strict safety standards.
- Clear product information and labelling: The consumer must receive clear and exact information about use, safety and possible risks of our products. Fact-faced labelling and instructions help the consumer make safe and conscious purchasing decisions.
- Evaluating and preventing risks: The company must be aware of possible risks referring to its products and take measures to minimize and prevent possible danger.
- Continuous monitoring and quality control: The safety of our products must continuously be monitored and controlled. This includes, for instance, regular tests and controlling as well as fast intervention in case of safety risks.

8. Responsible marketing and communication

- We market our products responsibly. Our marketing shows truthfully our products, services, prices and other aspects.
- We communicate openly, directly and honestly. Our employees are also assumed to communicate openly and truthfully, within the company as well as outside.
- As a cooperation partner, we never act in a way that would harm the reputation or the competitiveness of our cooperation partners.

9. Respect for privacy and data protection

- We comply with data security legislation when processing personal data.
- Any confidential information we have received about the company's activity, employees, customers and cooperation partners we keep confidential and do not disclose or share this information with anyone other than the parties concerned.
- Without a legitimate reason those dealing with personal information are not allowed to share this information with others.

10. Commitment to continuous development and improvement

- We continuously aim to develop our operations and processes in order to improve ethics, efficiency and effectiveness.
- We welcome feedback and evaluate it in an open and constructive manner.



Supervision and management of Code of Conduct

Our organization offers regular training and raised awareness of ethical guidelines and expectations. This helps ensure that all parties concerned understand the ethical guidelines and are able to apply them in practice. The management is expected to be role models in their ethical conduct. They have to comply with the ethical principles and show this in practice.

Brunberg uses a Whistle Blow channel with the help of which the employees are able to report unethical behavior anonymously and safely. There is also a locked mailbox for paper forms reporting disrespectful behavior.

Violation of the ethical guidelines can lead to disciplinary steps, e.g. critical remarks, warning or termination according to law. Some of these violations may also imply offence, in which case Brunberg may submit information to the authorities.

Brunberg has approved of the ethical guidelines at the Board Meeting on 08.11.2024.

Brunberg will regularly review the ethical guidelines to make sure they are up to date and adequate.