

TOKMANNI

TOKMANNI CODE OF CONDUCT



**WE WANT TO BE
RESPONSIBLE AND WE
EXPECT THE SAME FROM
OUR PARTNERS.**



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PRESIDENT AND CEO'S GREETINGS



To succeed, Tokmanni must operate responsibly. How we do things is just as important as what we do. We expect the same from our partners.

Compliance with laws and decrees and good corporate governance practices are our minimum requirements. Our operations are founded on the provisions of the UN's International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact.

Our operations are guided by our three values: pride in low prices, dare to renew and do it together. Our values also guide us in situations where it would otherwise be difficult to make a choice.

Low prices are closely linked with responsibility towards people and the environment in everything that we do.

Tokmanni's responsible business operations are guided by its Code of Conduct. The Code of Conduct includes the rules that guide all of us in everyday work and decision-making. When we follow the rules, we act openly and fairly both within Tokmanni and with our partners. The practical guidelines of the Code of Conduct are founded on more detailed principles that deal with topics such as human rights and anti-corruption. In addition, we also have instructions for conducting everyday matters. Everyone at Tokmanni must regularly take part in online and advanced training to be familiar with the Code of Conduct.

Tokmanni's management is fully committed to the Code of Conduct, and we expect the same from everyone at Tokmanni and from our partners. If we notice faults or violations in our operations, it is our duty to intervene without hesitation. Together we can make Tokmanni even more responsible.

Mika Rautiainen

President and CEO

Tokmanni Group Corporation

FAIR AND RESPECTFUL TREATMENT OF PEOPLE

EQUALITY AND FAIRNESS

We respect human rights and treat all people equally and in a non-discriminative manner, regardless of their race, colour of their skin, nationality, language, ethnic origin, age, beliefs, religion, gender, sexual orientation, family relations, disability, political action or labour union activity. Equality and fairness are our key principles in recruiting, remuneration, fringe benefits, access to training and career development.

We do not tolerate harassment or bullying in any form at the workplace. Each employee is obliged to act fairly and work towards a pleasant and inspiring workplace atmosphere. At Tokmanni, everyone has the freedom to express their views and will be held accountable for this. In their own time, outside of Tokmanni, employees represent their own opinions, not Tokmanni's. However, supervisors especially are expected to understand that many of us are known through our work, which places particular demands on our behaviour also outside working hours

More information on this subject is available in the Tokmanni's Human rights principles.

OCCUPATIONAL HEALTH AND SAFETY

We minimise occupational accidents, promote occupational health and expect the same of our business partners. Every employee is responsible for promoting safety in everyday work. In our operations, we focus on prevention and the effectiveness of safety measures and devices. Observing guidelines regarding the use of protective equipment, for example, promotes the safety of personnel, customers and business partners. Safe and disruption-free operations ensure successful business operations.

**RESPECT AND
TREAT EVERYONE
FAIRLY.**



BUSINESS INTEGRITY

COMPLIANCE WITH LAW

We comply with current laws and decrees in our operations. Compliance with applicable legislation and respect of international commitments and the principles of good governance form the foundation of Tokmanni's Code of Conduct.

PREVENTION OF CORRUPTION

We do not tolerate any type of corruption in our operations. Tokmanni's employees or their related parties may not give, receive or otherwise condone such benefits, gifts or hospitality that may have an inappropriate influence on decisions taken at work.

We may give or receive reasonable benefits that are of minor value. As a general principle, the value of benefits may not exceed 100 euros and their purpose may not be to inappropriately influence work-related decisions.

We practice special care and consideration in our relations with officials when offering them benefits, gifts and hospitality.

More information on this subject can be found in Tokmanni's anti-corruption principles.

FINANCIAL INFORMATION

We comply with national legislation and generally adopted financial statement standards in accounting and reporting. Based on these, Tokmanni is able to take responsible decisions and provide truthful, complete, up-to-date and accurate information on its operations.

We make a complete and correct record of our business operations in the company's accounting. All erroneous entries and entries that are in conflict with the true nature of the relevant transaction are forbidden. We operate as required by legislation concerning money-laundering.

CONFIDENTIAL INFORMATION

We safeguard the business secrets and other confidential information of the company and of our business partners. Employees and Tokmanni's business partners may not disclose or use such information without permission.

PRIVACY PROTECTION

We respect the protection of our employees' privacy and comply with data protection legislation. Personal data provided by employees, customers and business partners, and other parties are used only as provided by data protection legislation.

More information on this subject can be found in Tokmanni's data protection principles.

SAFEGUARDING THE COMPANY'S ASSETS

We safeguard the company's financial, tangible and intangible assets such as the company's tools, real estate, intellectual rights and brands. We use Tokmanni's assets with care and only for the attaining the company's business goals. The use of Tokmanni's assets for personal purposes or to the detriment of the company is prohibited.

COMPETITION LAW

We support fair and open competition. Tokmanni complies with applicable competition law and does not condone violations of it. Tokmanni's employees should avoid situations that involve a risk of breaching competition law.

More information on this subject can be found in Tokmanni's competition law principles.

INTERNATIONAL SANCTIONS

We comply with international sanctions and the restrictions imposed by them to the export and import of goods.

More information on this subject can be found in Tokmanni's sanction principles.

CONFLICTS OF INTEREST

We are loyal to Tokmanni in all actions we take. A conflict of interest emerges when an employee or his or her related party has a personal, financial or other interest that may be contrary to Tokmanni's interests. Before proceeding in a matter, we notify our supervisors of potential conflicts of interest.

We choose our employees and business partners based on their skills and competence. We do not hire relatives, friends or acquaintances, take on companies that they represent or make contracts with them based on the fact that they have personal relationships with Tokmanni's employees. In such situations, persons employed by Tokmanni who have a conflict of interest may not take part in the decision to hiring an employee or select a partner.



**LET'S BE
CAREFUL!**

MINIMIZING ENVIRONMENTAL IMPACTS

We minimise the adverse impact our operations have on the environment and expect our partners to strive for the same. We use materials and resources efficiently and actively seek to improve ways of utilising them throughout the value chain. We strive to use environmentally friendly materials and services in all our operations.

CO₂

**MINIMIZE
EMISSIONS AND
PROTECT NATURE.**



RESPONSIBLE SOURCING

We ensure that the products that we offer to consumers are safe and of high quality and that they have been produced responsibly in ethically acceptable production conditions. We demand that product manufacturers comply with all legislation concerning working conditions and human rights and with international norms concerning such matters as child labour and working hours and set the same demands for their own suppliers.

We expect our suppliers and service providers to commit to the Code of Conduct of amfori Business Social Compliance Initiative (amfori BSCI). We observe the due diligence principle in supervising the supply chain and seek to minimise the associated corporate responsibility risks. We monitor the operations of our suppliers with our own and third-party audits. Our relationship with our suppliers is based on honesty, fairness and mutual trust.

More information on this subject can be found in the amfori BSCI Code of Conduct.



RESPONSIBLE COMMUNICATIONS AND MARKETING

COMMUNICATIONS

We strive to communicate with our stakeholders as efficiently as possible. We disclose information transparently and communicate in a consistent and precise manner. Tokmanni's communications operations are always reliable, proactive, impartial and up-to-date.

Tokmanni's communications are the responsibility of its President and CEO, CFO and CIO and Vice President of Marketing and Communications. They are entitled to comment on all matters related to Tokmanni. Other members of management can participate in external communications if so requested by the official spokespersons, and they are entitled to comment on their respective areas of responsibility, if necessary. In addition, all Tokmanni employees represent the company and communicate the corporate image and reputation of Tokmanni with their actions and behaviour.

More information on this subject is available on Tokmanni's Disclosure policy.

MARKETING

We observe good marketing practices and take our various target groups into consideration. We provide truthful, comprehensible information. We present our sales and unit prices in a clear, unambiguous manner that is easy for consumers to understand and notice. Our marketing reinforces consumers' ability to make well-founded purchase decisions.

SPONSORSHIP AND DONATIONS

Our sponsoring operations seek to further our business and improve the recognisability of our company. Sponsorship must be honest and comply with laws and good business practices. Tokmanni's sponsorship subjects must support the company's values and corporate image.

Tokmanni can make donations to charitable organisations in accordance with its donation principles. We do not financially support political parties, political groups or individual politicians, nor do we purchase art or other items from them to support them.

More information on this subject is available under Tokmanni's sponsorship and donation principles.

REPORTING VIOLATIONS AND CONSEQUENCES TO VIOLATIONS

QUESTIONS AND REPORTING

When employees are unsure of how to interpret Tokmanni's Code of Conduct or about personnel matters, they can contact the Compliance unit or the HR department.

Tokmanni's employees must immediately notify Tokmanni's Compliance unit of suspected cases of internal financial wrongdoings or actions that violate Tokmanni's Code of Conduct. Misconduct must be reported by the whistleblowing channel <https://app.incy.io/tokmanniwb/links/sisainen-ilmoitus>, by telephone to a member of the Compliance unit or by letter to Tokmanni Oy / Compliance unit, Isolammintie 1, 04600 Mäntsälä, Finland.

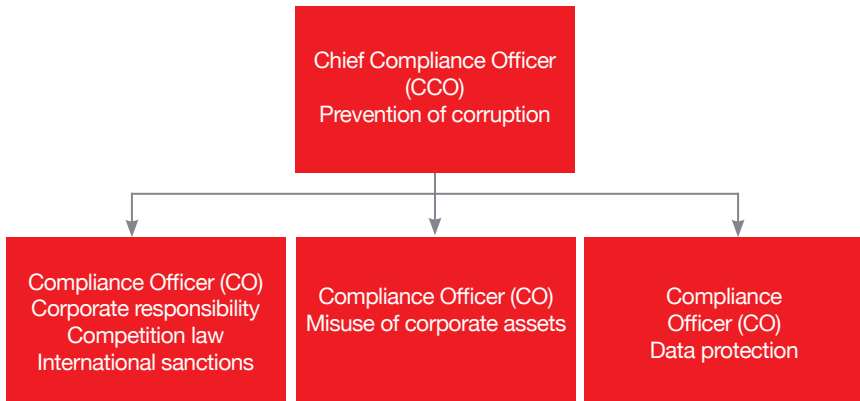
All notifications of misconduct will be processed in confidence as required by data protection legislation. Tokmanni will take appropriate action based on the notifications.

CONSEQUENCES

Violations of Tokmanni's Code of Conduct have appropriate consequences and may lead to the termination of the employees' employment.

If the violation involves unlawful activities, the case may be reported to the appropriate authorities and other legal actions may be taken.

TOKMANNI'S COMPLIANCE UNIT



TOKMANNI