

1. Snellman's Code of Conduct

At Snellman, we treat others as we would like to be treated ourselves.

Snellman's Code of Conduct applies to every company in the Snellman Group as well as every employee, manager, officer and director of Snellman Group. We are committed to conducting our business ethically and responsibly to ensure the quality, reliability and sustainability of our activities. Snellman's Code of Conduct helps us every day in making decisions based on fairness, transparency and ethics. The Code of Conduct constitutes the ethical instructions for our daily work.

Snellman expects the same conduct from our suppliers and business partners. Every Snellman supplier and business partner is required to apply similar principles of ethical business behaviour as described in this Code of Conduct. A more specific Code of Conduct applies to Snellman Group's suppliers.

2. Personnel

Snellman respects, supports and promotes all internationally recognised human rights principles and employees' rights in all its business areas. All bullying, harassment or offensive behaviour towards others is strictly forbidden and is addressed immediately.

Occupational safety

At Snellman, we believe that all accidents can be prevented, and our goal is zero workplace accidents. Therefore, we promote occupational safety by instructing our personnel in safe methods of work and by ensuring that they are observed, and that machines, equipment and premises are safe to use.

All personnel are required to report any deviations, hazards, near misses and accidents in compliance with the instructions.

Promotion of wellbeing

We promote our employees' mental and physical ability to work by developing workplace conditions and wellbeing. We are constantly developing our personnel in order to improve their professional competence and ability to work.

Equality in the working community

We do not tolerate any discrimination of employees on the basis of race, ethnic origin, age, gender, disability, sexual orientation, religion, marital status, social origin, political conviction, trade union membership or similar attributes. We guarantee that competent persons have equal possibilities to gain employment, advance in their careers, increase their rate of pay and improve their skills.

Terms and conditions of employment

Our salaries and wages, working hours, holidays and other conditions of work comply with the local regulations. A written contract of employment is concluded with each employee. We do not condone any kind of forced labour or the use of child labour.

Our employees must be able to work in an intoxicant-free environment. The use or consumption and possession of narcotics, alcohol or other substances that have an adverse effect on a person's ability to work is strictly forbidden in the workplace.

3. Snellman product safety

The high and natural quality and flavour of our products are the basis of our business. For us, they are not just a momentary trend or marketing gimmick; instead, they are a choice made in accordance with our values and strategy.

Product safety

Product safety is the cornerstone of Snellman's business and our value commitment to customers. Risk management of the production process is maintained by using a hazard analysis and critical control point (HACCP) system. The efficiency of this system is ensured by regular inspections. Snellman Group operates under a single unified quality management system.

Hygiene

We ensure that all employees handling foodstuffs hold a hygiene pass. Every year, we organise training to improve the hygiene skills of our employees.

Visitors to our production facilities are provided with instructions regarding personal hygiene and hygienic conduct, and they are always under supervision when viewing our production.

Traceability

We seek to ensure that the entire supply chain is transparent and traceable regarding raw materials, ingredients and end products.

Product information

The product information on our packaging shows exactly what each product contains. The information is always compliant with the local legislation of the product's country of destination.

Restricting the use of additives

We use as few additives as possible in all our production. The additives used are necessary for the product characteristics and are safe according to studies.

4. The environment

At Snellman, we are aware of our environmental responsibility and we are committed to environmentally friendly methods and energy-efficient solutions in all our operations. These matters are considered when planning any new investments.

At Snellman, we recognise that our business operations can have both positive and negative environmental impacts. We work constantly to improve our operations and reduce adverse environmental effects. This means that all of us at Snellman must understand the possible environmental impacts of our actions and production plants. This objective is supported by the environmental systems in use at our production plants and in our personnel training and technical solutions.

Our environmental responsibility is visible in our past, current and future actions. We are committed to reducing our emissions. We also continuously improve our sustainability reporting.

We ensure the wellbeing and security of domestic food production by building a sustainable and responsible chain from farms to homes. We respect the environment and reduce the burden placed on it by using raw materials and energy efficiently.

5. Responsible business operations

Responsible business operations are one of the basic principles of our activities. We always observe all current local, national and international laws, regulations and voluntary commitments in our business. We also expect a similar commitment to ethical conduct from our partners. We observe good governance in company management.

Competition law

In our operations, we are committed to free and open competition. We observe the current competition legislation of each country in which we operate. We do not tolerate violations of competition law in any circumstances.

Supplier relations and customers

Snellman's suppliers and producers are our strategic partners in serving our customers. Sourcing decisions are based on quality and total costs of the product or service, as well as the supplier's or producer's reputation, reliability, security of supply and social responsibility.

Our vision is to be our customers' most preferred partner. We pursue this vision by constantly improving customer satisfaction, concentrating on the quality of both services and products and by developing new products that are of interest to customers.

We maintain our reputation by observing quality processes as well as the hygiene and safety requirements of the food industry in all our operations. We also monitor our producers, suppliers and customers in order to ensure that they act in compliance with laws and regulations.

Anti-corruption

Every company in the Snellman Group and all personnel comply with legislation and internationally recognised principles for combating corruption and bribery. We do not tolerate corruption in any form, and we do not engage in improper or corrupt business arrangements. We expect the same from all third parties, including customers, suppliers, distributors, and all business partners.

Our commitment against corruption means that we do not pay or accept bribes or kickbacks of any kind. We do not accept or offer any gifts or corporate hospitality, donations or sponsorship, except when they are appropriate and in compliance with the law and Snellman's policies and procedures. We understand that a breach of anti-corruption legislation may result in serious consequences, criminal liability and fines for Snellman, and the individuals involved.

Principles of fair trading

We observe the values, ethical principles and strategic guidelines of the Snellman Group in our sales, sourcing and business activities. Fair trading means that cooperation partners behave towards each other responsibly, in good faith and by observing good business practices. We treat the companies owned by the owners of the Snellman Group and their close relatives in accordance with the same arms-length principles as other cooperating companies.

Personnel responsible for sourcing must act responsibly and independently. Our personnel may give, offer or receive gifts or participate in events that are of reasonable value and an ordinary nature. Receiving or providing a gift or participating in an event worth more than EUR 200 is forbidden. Travel and accommodation costs incurred for participation in partner events and audits are always paid for by the Group.

Our personnel must always observe particular care and consideration in relationships with public authorities regarding the provision of gifts and events. Benefits or gifts offered to public authorities must be worth less than EUR 100 and are forbidden if their purpose is to promote or expedite normal official decisions.

Snellman does not promote or sponsor any political parties.

We observe the procedures advised by the Owners' Council in our sponsorships.

Financial information

We observe national laws and international accounting standards in our accounting and reporting. Adherence to these standards ensures that the owners and partners receive correct and up-to-date information regarding the operations of the Group and its subsidiaries. We enter all accounting transactions with the correct content and information.

6. Protecting the company's information and assets; information security

Confidential information

Confidential and sensitive information is of great value to our business. We keep such information protected and expect our partners to do the same in their dealings with us. Divulging confidential information is prohibited by Snellman's Code of Conduct and may lead to sanctions of varying degrees of severity and even the discontinuation of business cooperation.

Protecting Snellman's assets

Every Snellman employee is responsible for protecting our joint assets from loss, damage, misuse or theft as if they were their own property. Assets refers to both physical assets and non-tangible assets such as information, inventions or intellectual property. Snellman's assets may only be used for Snellman's business purposes, or in a limited fashion for other purposes approved by the management. Using Snellman's assets for one's own purposes or to Snellman's detriment is forbidden.

Information security

At the Snellman Group, information security refers to a state in which the operational environment of IT systems can be trusted, and their functionality has been guaranteed. Information security is a key aspect of our operational environment.

We comply with Snellman's information security and IT guidelines and proceed with caution when sending commercially significant or sensitive content, protect the data of Snellman companies and ensure that we are up to date regarding cyber security measures. All employees are expected to comply with our information security and IT guidelines, act responsibly online and protect our network from unauthorized use and access. Special caution needs to be taken when working remotely or in public places.

Information security comprises the security of digital systems and data as well as physical safety. We process all data in an information secure manner and in compliance with the law, also taking into consideration the requirements of the Cybersecurity Directive. We are constantly developing our processes to meet the requirements of our environment.

7. Stakeholders

Entities

We promote the welfare of entities in our areas of influence by providing job opportunities and paying taxes and other official levies. We strive to participate in the development projects of entities in our areas of influence as far as possible when they support our business and our values.

Public authorities

We work in cooperation with different public authorities, ensuring a two-way flow of information and compliance with laws as well as other regulations and orders.

Owners

Attainment of our business objectives produces long-term financial value for the company's owners.

Personnel and partners

All Snellman employees and partners have been made aware of Snellman's Code of Conduct. We observe these principles every day in all our activities.

8. Raising concerns

It is the duty of all Snellman employees to maintain the company's good reputation and ethical standards in accordance with this Code of Conduct. Good will and openness continue to be our driving forces. We want to keep it that way.

At Snellman, there are several channels for raising a Code of Conduct concern. Personnel can talk directly to a line manager, management, HR or Legal and Compliance, or use the Whistleblowing Channel in person or anonymously. The Whistleblowing Channel is available for internal and external use at: <https://link.webropol.com/cp/snellmanwhistleblow>

All reports, regardless of the reporting method or channel, will be taken seriously, investigated properly and handled with discretion and confidentiality. We are all expected to cooperate in investigations, including providing information and evidence. Misconduct or a breach of the Code of Conduct may result in the loss of employment, personal liability and other corrective measures. Snellman does not tolerate any form of retaliation against an individual who reports a Code of Conduct violation in good faith. However, malicious or false reports may lead to disciplinary actions.

Approved by the Board of Directors of Oy Snellman Ab on 28 March 2025.