

CODE OF CONDUCT



MAKING WOOD MATTER



Dear Raute Team, Partners, and Stakeholders,

Compliance with laws, regulations, and ethical conduct lies at the core of our business at Raute. As we embark on a new strategy implementation, we are determined to assume an even more significant role in our industry by driving sustainability, positive change and establishing new industry standards also in the ways of conducting business.

This Code of Conduct serves two purposes. Firstly, it provides clear guidance on Raute's expectations and requirements for our personnel, partners, and stakeholders. It sets forth the principles and practices we believe are crucial in upholding our integrity and ensuring responsible behavior. Secondly, it underscores our unwavering commitment to maintaining the highest standards of conduct and integrity across our organization.

I trust that each member of our team will fully embrace this Code of Conduct as an integral part of their professional lives. It is important to recognize that our success relies on the decisions we make every day.

Thank you for your dedication and commitment to upholding these standards.

Mika Saariaho
President and CEO

OUR CODE OF CONDUCT



PEOPLE AND SOCIETY:
Employer of the future



PRODUCTS & SERVICES:
Valuable products and services



PARTNERSHIPS & SUPPLY CHAIN:
Reliable partnerships & responsible supply chains



BUSINESS CONDUCT:
Ethical business conduct



DATA & PROPERTIES:
Safeguarding confidentiality & privacy and properties
Openness and transparency



WHISTLEBLOWING:
Confident whistleblowing



Employer of the future

We respect the principles stated in the United Nations Universal Declaration of **Human Rights**. Throughout our supply chain and as an employer, we support the fundamental rights at work as defined by the International Labor Organization (ILO), which include the freedom of association, the right to collective bargaining, the abolition of forced labor, and equal opportunities and treatment of employees. We do not use **child labor** or engage with suppliers or subcontractors that do so.

It is our priority to provide a safe, healthy and hazard-free work environment. We promote psychological and physical **safety and well-being** through procedures and measures that reduce risks at the workplace.

Each employee is required to use necessary personal protective equipment, follow safety instructions, and report any shortcomings relating to safety or protection measures both at our own premises and when working at installation sites. We avoid taking unnecessary risks when travelling for work. We maintain a workplace where employees are treated with dignity and respect. Everyone is entitled to work in peace and without fear. We prohibit coercive, threatening or offensive behavior or sexual harassment or any other abuse.

We promote **equal opportunity** and appreciate **diversity** in our employees' background, their talent, education and experience. We believe this contributes to our success and sustainability by enhancing

innovativeness, flexibility, and the ability to communicate with our stakeholders. Thus, we base our people related decisions on qualifications, skills and merit. We do not tolerate discrimination based on race, caste, nationality, religion or beliefs, disability, gender, sexual orientation, or other comparable reason. We encourage everyone to pay attention to practices and manners that promote **equity, belonging and inclusion** at the workplace.

Professional development of our employees is encouraged throughout the organisation. We respect the rights of all our employees to engage in political activities, and consider them as personal matters, and thus we do not practice politics in the workplace.



Valuable products and services

We always provide, without compromise, the quality we have promised, and we are committed to the continuous improvement of our **products and services**. Our processes and performance are guided by the ISO 9001 quality management system. By doing this, we also strive to provide environmentally efficient solutions and improve the level of environmental protection and energy efficiency of our operations. We aim to build sustainable growth through innovation and actions that contribute to **circular economy**. These will bring benefits to us, our customers as well as the planet.

We manage environmental risks systematically by taking sustainability and

environmental issues into account when planning and implementing operations and products. The tool for the continual improvement of environmental performance is the ISO 14001 environmental management system. This also helps us to mitigate negative impacts to **biodiversity**.

We focus on the key environmental effects of the wood products industry and help our customers to operate in a manner that takes the **environment** into account by improving the efficiency of raw material use, reducing energy consumption and minimizing the consumption of chemicals, especially glue. Some of the products of our customers act as carbon storages and thus increase

our handprint in our value chain. We actively develop solutions that can help to enhance the energy efficiency of customers' production processes and improve the utilization of byproducts. We take safety into consideration already in the design phase of our products and promote it throughout our operations. Automation improves occupational safety and ergonomics.



Reliable partnerships & responsible supply chains

Raute is a reliable and responsible cooperation **partner**, and we strive to establish long-term relations with our customers, suppliers and subcontractors. We are honest and fair in all our dealings and we respect our promises and commitments. We expect Raute's personnel, customers, suppliers and contractors to follow ethical principles in their daily activities. This criterion is vital for engaging in long-term business relations.

We strive to establish and maintain a **supplier network** which actively wants to promote ethical business principles and practices. We want to support our business partners by sharing Raute's experiences

and insights. We are also open to learning from the experiences of our business partners. We assess our suppliers regularly and systematically in regard to financial, social, and environmental aspects. The more detailed requirements are explained in Raute's Sustainable Supply Chain Policy, which we expect all our suppliers to follow.



Ethical business conduct

We are proud of doing business in many countries around the world, and we honor our obligations on international trade related to export controls, and economic sanctions.

We have zero tolerance for **corruption and bribery**. We do not pay, ask, offer, or take bribes or use illegal or unethical means to facilitate favorable decisions or services through intermediaries or without intermediaries. This applies also to advising and instructing to take or give bribes. Our employees know that they will be praised for any delay or loss of business resulting from their refusal to deal with bribes or facilitation payments.

We do not participate in or support **money**

laundering or terrorist financing under any circumstances in our global operations. Thus, we do not do business with sanctioned parties.

We promote **fair competition** and free markets. We do not discuss or agree on pricing, market shares or any similar activities with competitors. Competition laws protect and promote efficient competition, and each Raute employee is familiar with these laws in all our operations. In practice this means, for example, that we do not participate in price or bidding cartels, and we do not abuse our strong market position nor do we exchange price or other commercial information with our competitors.

We refrain from business relations that

may lead to **conflicts of interest**. The rule of thumb is to openly disclose and recuse ourselves from situations which may cause a conflict between the company's interests and our personal interests. We do not seek benefits for ourselves or our loved ones by using our position or information obtained owing to it.

We do not offer or accept **gifts, hospitality or entertainment** exceeding reasonable cost, quantity or frequency. All gifts and hospitality should be given openly and without any promises or expectations of reciprocity.



Safeguarding confidentiality & privacy and properties

We respect business secrets and other **confidential information**. This applies both to Raute's information and to the information of its customers and other business partners. We ensure the privacy and the secrecy of confidential information through appropriate measures. Raute collects and retains only that **personal information** which is allowed by law and is appropriate for its effective operations, and the data will be processed carefully, fairly and lawfully protecting the privacy of people. Employees collecting and maintaining any people data, must use it only for the appropriate purpose, and access of such data is limited to appropriate authorization and a clear business need for that information.

Raute is a public company, and we are bound by the **insider information** rules, laws and regulations. Insider trading and the disclosure and use of inside information is restricted in order to prevent misuse. The exploitation of insider information is detrimental for the perpetrator, but also to Raute's share price and brand.

We value the creation and protection of knowledge and **intellectual property**. Accordingly, we safeguard our own intellectual property and correspondingly respect the intellectual property held by third parties. We protect **confidential information, information systems, technology, and Raute's physical**

assets from damage, theft and misuse. Our **information security** measures are appropriately placed and in accordance with the risk.



Openness and transparency

We promote **openness and transparency** and continuous interaction with our stakeholders, including customers and other business partners, shareholders, employees, authorities, local officials and the media. We maintain accurate financial records, and comply with generally accepted accounting principles, laws and regulations.

Raute is a public company whose shares are listed on the Nasdaq Helsinki stock exchange. We make sure that all our **public news releases** comply with the securities market laws and regulations. We provide all our stakeholders with information on our operations openly, honestly, fairly and simultaneously, without favoring any group or

individual and in compliance with the generally accepted practices of the equity and debt capital markets.

These same principles apply to our **marketing and social media**. We promote positive, truthful and clear communication.



Confident whistleblowing

Raute has an information gathering system in place where Raute's internal stakeholders can inform the organisation on their **concerns**. This can be done also anonymously. Raute welcomes notifications not only on suspicions on illegal conduct, but also for example on unethical conduct, bullying and inappropriate treatment. Raute's whistleblowing process follows the legal obligations placed on it. We do not tolerate retaliation against persons who voice concerns in good faith and therefore everyone can do so confidently.

It is of utmost importance, that everyone at Raute can trust the process and feel responsibility to notify about any concerns

that they may have – it is in everyone's best interest that we do not turn a blind eye. When we do that, we silently approve and enable the conduct.

Discussion with a supervisor, the management, HR or reporting through the whistleblowing channel are the appropriate ways to notify on any concern. Never think, that it is not important enough.

The whistleblowing form can be found from our intranet.



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