

The background of the entire page is a close-up photograph of fresh green peas. Several pea pods are visible, some in sharp focus and others slightly blurred. A small pea shoot with two leaves is positioned near the top center. The lighting is soft, highlighting the texture of the pods. On the right side, there is a large, white, stylized graphic element that resembles a thick, curved line or a partial letter 'A' that extends from the top to the bottom of the page.

ATRIA

# **ATRIA CODE OF CONDUCT**

# CONTENTS

Introduction .....3  
Putting policies into practice .....4  
We take care of our business .....5  
We care for our stakeholders.....7  
We care for the environment .....9  
Compliance ..... 10



**KAI GYLLSTRÖM**  
CEO  
Atria Plc

## TOGETHER TOWARDS SUSTAINABLE AND PROFITABLE GROWTH

Atria has a strong foundation on which to build its future – over 120 years of experience, robust financial performance, and a skilled, committed workforce. Our TOGETHER 2030 strategy guides us forward in a controlled and consistent manner, combining our traditions with renewal. At its core is working together – everyday decisions, collaboration, and a shared direction.

Atria’s vision is to be the Winning Northern European Food Company. Achieving this goal requires a strong and responsible operating culture, where everyone’s contribution is important. When our operations are based on shared principles, daily work flows smoothly, decision-making is faster, and we can better meet the expectations of consumers, customers, and owners.

Atria’s Code of Conduct supports our strategic objectives and guide our daily activities. They are based on a company culture defined by all our personnel – the Atria Way of Working:

“We focus on consumers and customers, we deliver quality, we are hungry for success, and we enjoy our work.”

By acting in accordance with these values and principles, together we can steer Atria towards sustainable development, new innovations, and success. Responsible business is profitable business – and it is created through everyday choices and actions.

We will focus on

- growing and optimizing our core business,
- accelerating in growth categories with investments and resources,
- increasing collaboration across our countries for scale benefits and
- renewing for the future.

Our financial targets – such as over €2 billion in turnover and a 12% return on equity – support sustainable growth. Achieving them requires commitment, cooperation, and responsibility from all of us.

### Together 2030.

# INTRODUCTION

Our Code of Conduct emphasises fundamental ethical principles that we value and adhere to in our daily operations. These principles guide us in creating sustainable business and strengthening our corporate culture. The Code of Conduct is complemented by the company's policies and guidelines, which define and guide the behaviour that we require of all Atria employees.

## **ATRIA IS COMMITTED TO THE FOLLOWING INTERNATIONAL AGREEMENTS AND RECOMMENDATIONS IN ITS CODE OF CONDUCT:**

- The UN Global Compact initiative for the promotion of human rights, labour rights, environmental protection and the prevention of corruption. The initiative is also known as The Ten Principles.
- UN Universal Declaration of Human Rights and Convention on Rights of the Child
- UN Guiding Principles on Business and Human Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and core labour conventions
- OECD Guidelines for Multinational Enterprises
- International Chamber of Commerce (ICC) Charter for Sustainable Development and ICC Anti-Bribery and Anti-Corruption Guidelines
- Business Social Compliance Initiative (BSCI) purchasing principles
- SBTi Science Based Target initiative approved climate targets



## PUTTING POLICIES INTO PRACTICE

Atria Code of Conduct is the basic ethical principles for Atria's business operations approved by Atria Group's Board of Directors. Atria Group Management Team reviews the Code of Conduct and its complementary policies annually and presents any need for changes to the relevant approval body. Policies related to the company's governance are approved by Atria Group's Board of Directors and policies related to operative business functions are approved by the Group's CEO.

### ATRIA CODE OF CONDUCT

- Basic ethical principles concerning Atria's business operations
- Approval by the Board of Directors

### GOVERNANCE POLICIES

- Administrative principles and their implementation guidelines
- Approval by the Board of Directors

The Atria Code of Conduct and policies are management tools that are put into practice by incorporating these policies into the management system and operational guidelines of the companies within the scope of application. Awareness of the Code of Conduct is also increased through employee training and communication.

Adherence to Atria Code of Conduct is in all our interests and shall be followed in all situations. It is an important part of the company culture, and compliance with the code is the responsibility of the entire work community. It is important for the employee to carefully familiarize themselves with the Code of Conduct and know where to find the material. It's good to seek advice if something about the content of the Code of

### OPERATIONAL POLICIES

- Operational principles and their implementation guidelines
- Approval by the CEO of Atria Group

Conduct or their compliance is unclear. Observed violations and grievances must be reported without delay.

The supervisor supports his or her team in understanding the Code and ensures that they are implemented in the daily practise. The Code shall be taken into account when setting targets for personnel. A supervisor must immediately address any detected violations or issues.

# WE TAKE CARE OF OUR BUSINESS

We are hungry for success and we care about how it is achieved. Compliance with healthy and sustainable business practices, as well as applicable laws and regulations, lay the foundation for all of Atria's operations.

## COMPETITION

We are committed to fair and free competition. We conduct our business in compliance with the principles of fair competition and applicable legislation.

» **Competition Policy**

## ANTI-CORRUPTION AND ANTI-BRIBERY MEASURES

We do not accept corruption or bribery in any form. We do not give or accept bribes or other unjust benefits to promote business or obtain financial gain.

» **Anti-Corruption Policy**

## DUE DILIGENCE

When selecting business partners and cooperating with them, we exercise due diligence to ensure that our partners comply with legislation and are reputable operators. We require our business partners to comply with all applicable laws, regulations and international commitments that apply to their operations. Companies or their accountable persons subject to sanctions legislation are not accepted as Atria's direct or indirect business partners.

Our work with our major business partners is based on written agreements. In the agreements, the business partners undertake to comply with and promote our Code of Conduct. Cooperation with Atria also obligates our business partners to

comply with our requirements for product and service quality, the related procedures, and the supply chain. We regularly assess and monitor the ability of our business partners to meet their agreed obligations.

» **Sourcing Policy**

» **Sanctions Policy**

## DISCLOSURE OF INFORMATION

We are committed to making responsible decisions in our business. We conduct our bookkeeping and public reporting in accordance with legislation applicable to listed companies and with international financial reporting standards.

» **Disclosure Policy**

» **Investment Policy**

## INFORMATION SECURITY

Information security means ensuring the confidentiality, integrity and availability of information. The information must remain unchanged and correct, and be available appropriately when necessary.

We are committed to continuously improving information security and protecting the trade secrets and other confidential information we receive in our work about the company's operations, personnel, customers and partners. We handle confidential information in our possession with due care and in accordance with applicable laws.

By adhering to the security principles of information and cybersecurity, we ensure that confidential information in our possession or received is not unlawfully used or disclosed to third parties or companies.

» **Information Security Policy**

» **GDPR Policy**

» **Insider Policy**

## **CONFLICTS OF INTEREST**

In accordance with our duty of loyalty, our employees must always act primarily in Atria's best interest. Employees shall avoid any personal activities and financial interests which might be in conflict with their responsibilities to Atria. We do not accept employees seeking personal gain through misuse of their position.

» **Related Party Policy**

» **Anti-Corruption Policy**

## **RISK MANAGEMENT**

Risk management is an integral part of Atria's strategic process, business decision-making and operative processes. Extensive risk analysis helps us secure our business as we leverage the new opportunities generated by our business or the markets in which we operate.

» **Risk Policy**

» **Decision-Making Policy**

# WE CARE FOR OUR STAKEHOLDERS

Our strategy and actions are embodied in our day-to-day engagement with our stakeholders. We engage in dialogue with our stakeholders to better understand their interests and to take their wishes into account in our business. Respect for human rights and their inviolability are required in all our stakeholder relationships. We commit to respecting and promoting internationally recognised human rights throughout our value chain and do not tolerate violations of them under any circumstances.

## OUR PEOPLE

Our employees are the most important resource for us at Atria: our success is due to the expertise and motivation of our employees. We ensure the safety, well-being, and competence development of our employees.

In the continuous improvement of our operations and working environment, we take into account the factors that affects the well-being of our personnel. Factors that enhance work well-being include a physically and mentally safe work environment, equal treatment of personnel, fair compensation for work, balance between work time and leisure time, and respect for fundamental human rights.

We are committed to providing a safe and healthy working environment for our employees. We expect our people to follow our guidelines for well-being and safety.

We do not tolerate conduct that could be considered objectionable, humiliating, threatening or hostile towards a person or group. We intervene in all bullying and harassment without delay.

»HR Policy

## CONSUMERS AND CUSTOMERS

We are committed to focusing on the needs of our consumers and customers in the fulfillment of our mission: “We create inspirational food for every occasion. Our success is based on inspired people and the most preferred brand.” We

deliver quality in everything we do and consistently offer our consumers and customers value – reliability and quality, safe and sustainably produced products. We are committed to providing our consumers and customers with relevant product information. We value and maintain strong customer collaboration.

»Food Safety and Quality, Nutrition and Product Responsibility Policy

»Marketing and Communications Policy

»Trademark Policy

## ATRIA'S CONTRACT PRODUCERS

Atria's primary production contract producers are important partners for us and one of Atria's key success factors. Our producers' success is important to us and this is why we want to be the best partner for them. Together we can develop our chain's competitiveness, profitability, sustainability and transparency. We require our contract producers to commit to our Supplier Code of Conduct and production guidelines, which take into consideration the sustainability of production, including animal welfare, among other things.

»Atria Supplier Code of Conduct

»Animal Welfare Policy

## SHAREHOLDERS

We adhere to internationally accepted principles of good governance in our operations. Our objective is to generate

sustainable long-term financial value for the company's shareholders and provide them with truthful, up-to-date, and accurate information about our operations.

- » **Treasury Policy**
- » **Disclosure Policy**
- » **Finnish Corporate Governance Code**  
(Securities Market Association)

## **BUSINESS PARTNERS**

In our business, we are committed to a fair and ethically sustainable approach to our business partners.

We strive for active dialogue and transparency so that we can jointly develop our operating methods and strengthen our cooperation with our business partners.

- » **Atria Supplier Code of Conduct**
- » **Sourcing Policy**
- » **Animal Welfare Policy**

## **SOCIAL RESPONSIBILITY**

We contribute to the well-being of local communities primarily by providing jobs and paying taxes, but also by participating in development projects led by local communities or educational institutions that support our business or strategic goals.

We engage in cooperation with authorities and public debate to promote sustainable food production and other initiatives

relevant to our business. We are committed to fact-based, interactive, transparent and honest communication.

We do not represent the interests of political parties.

- » **Marketing and Communications Policy**
- » **Anti-Corruption Policy**



# WE CARE FOR THE ENVIRONMENT

We are aware of our environmental responsibility. We respect nature and we are committed to using natural resources sustainably and minimizing the environmental impact of our operations throughout the entire value chain.

## PREVENTION

We are committed to a preventative approach to solving environmental challenges. This means that we identify and assess potential environmental risks and take measures to minimise them before they become significant problems.

## PROMOTING ENVIRONMENTAL RESPONSIBILITY

We are committed to the goals of international climate conferences and have set science-based SBTi emission reduction targets for our own operations and value chain. We continuously strive to improve our environmental performance and report openly on our environmental impacts to our stakeholders. We also require our business partners to operate in an environmentally sustainable way.

## SUPPORTING THE DEVELOPMENT OF ENVIRONMENTALLY SUSTAINABLE TECHNOLOGIES

We support the development and adoption of environmentally sustainable technologies. This means investing in research and development, cooperating with other companies and research institutions, and supporting the deployment of environmentally sustainable technologies. We also strive to share information and experiences on environmentally sustainable technologies and best practices with our stakeholders.

»Environmental Policy

»Sourcing Policy

»Atria Supplier Code of Conduct

# COMPLIANCE

The Code of Conduct and the supporting policies concern all employees of Atria Group companies in all business areas. It is our duty to always comply with legislation, these ethical principles and the company's policies in our operations. We train our people to work in accordance with the Atria Code of Conduct.

In case of doubt about the interpretation of the Atria Code of Conduct, employees should contact their supervisor or Legal department. Our employees must immediately notify their supervisor if they suspect that the Atria Code of Conduct or its supporting policies have been breached or that the company's conduct has been unlawful. Reports of suspected violations can also be made anonymously through **Atria's Whistleblowing Channel (atria.com)**.

## INVESTIGATION AND CONSEQUENCES

Atria investigates any reports concerning its operations either internally or with the help of an external party when necessary, to ensure the investigation's impartiality. Any breach of the Atria Code of Conduct has consequences, depending on the severity of the breach, such as additional training of personnel, but it is also possible to terminate employment.

» **Whistleblowing Policy**

# ATRIA

**ATRIA PLC**

PL 900, FI-60060 ATRIA

Tel. +358 20 472 8111

**[www.atria.com](http://www.atria.com)**