

The background of the entire page is a close-up photograph of fresh green peas and a pea sprout. The peas are in various stages of growth, with some showing their characteristic bumpy texture. A small pea sprout with two leaves is visible near the top center. The lighting is soft, highlighting the vibrant green color of the vegetables.

ATRIA

ATRIA SUPPLIER CODE OF CONDUCT

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TOGETHER TOWARDS SUSTAINABLE AND PROFITABLE GROWTH

Atria’s more than 120 years of experience, robust financial performance, and dedicated personnel form a strong foundation upon which we build our future. Our TOGETHER 2030 strategy is a controlled and consistent development path that unites tradition and renewal – with collaboration at its heart.

The TOGETHER 2030 strategy highlights the importance of working together in achieving our vision: to be the Winning Northern European Food Company. This goal cannot be reached alone – we also need you, our business partners.

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 support sustainable growth: turnover exceeding €2 billion, a 12% return on equity, and ambitious climate objectives. Achieving these requires effective, transparent, and responsible collaboration throughout the entire value chain.

This Code of Conduct document sets out the principles by which we wish to work together with our partners. It supports our shared journey towards responsible growth, competitiveness, and future food solutions.

Together 2030.

INTRODUCTION

Atria's operations are affected by a globally changing environment and the expectations and requirements related to this environment. As a food company, our operations are also fundamentally related to people's daily lives. Sustainability in all our business operations is something that we need to take care of and to develop. For us sustainability is not just slogans and labels – it creates added value.

As sustainable development is an integral part of our operations, we want to ensure that the operation of our entire value chain is sustainable. We are committed to a fair and ethically sustainable way of doing business with our business partners, such as our material suppliers, farmers, subcontractors, agents, service providers and other suppliers and partners.

We require that our business partners comply with all applicable laws, regulations and international commitments regarding their own activities as well as the requirements set in this Supplier Code of Conduct of Atria. Furthermore, cooperation with Atria obliges partners to meet our requirements for product or service quality, procedures and the supply chain.

Atria Supplier Code of Conduct is based on Atria's commitment to the following international agreements and recommendations. Commitment to these principles is also required of supply chain partners:

- 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 the Convention on the 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) Responsible Purchasing Practices

WE CARE ABOUT OUR BUSINESS – BUSINESS ETHICS

COMPETITION

We are committed to fair and free competition. Atria requires its business partners to conduct their business in compliance with the principles of fair competition and the applicable laws.

ANTI-CORRUPTION AND ANTI-BRIBERY MEASURES

Atria does not accept corruption or bribery in any form. Atria's business partners must not give or accept bribes or other unjust benefits to promote business or obtain financial gain. Atria requires its business partners to comply with international anti-corruption conventions. Atria's business partners are not allowed to offer Atria's employees or other parties any gifts, hospitality, donations, or other benefits that could improperly influence business decisions or be considered bribes.

INFORMATION SECURITY

Atria complies with the risk management obligations established in the information security legislation and regulations applicable to the company. Risk management obligations also apply to Atria's business partners.

In their operations, business partners are expected to assess risks and ensure an appropriate level of information security to safeguard the continuity of their operations, as well as protecting against service interruptions, computer intrusions and other digital threats. In addition, business partners must promptly notify Atria of any information security incidents that could potentially affect Atria, its business or the delivery and/or quality of services or products provided by the business partners to Atria.

SAFEGUARDING THE CONFIDENTIALITY OF INFORMATION

Atria Plc, the parent company of the Atria Group, is listed on Nasdaq Helsinki Ltd. As a publicly traded company, Atria is bound by regulations concerning insider information. Atria's business partner must commit to protecting the Atria's trade secrets and other confidential information they receive about company's operations, personnel, customers and business partners. Business partner must manage confidential information in their possession with due care and by applicable law.

CONFLICTS OF INTEREST

Atria's business partners shall avoid situations with Atria's employees that may cause or appear to cause conflicts of interest in relation to Atria. A business partner must inform Atria of any potential conflicts of interest with the company before the start of the transaction.

TRADE SANCTIONS AND EXPORT CONTROLS

Business partners must comply with all applicable sanctions and export and import restrictions imposed by the European Union, the United Nations and other competent authorities. Business partners must ensure that the products and services delivered to Atria, and related payments, do not violate the aforementioned sanctions or restrictions and are not directly or indirectly delivered, used or transferred from a country or entity subject to sanctions. In accordance with due diligence, business partners are responsible for ensuring that operators in their supply chains also comply with these regulations.

WE CARE FOR THE PEOPLE IN OUR SUPPLY CHAIN

HUMAN RIGHTS

At Atria we respect and commit to adhering internationally recognised human rights in all our operations and promoting their realisation throughout our value chain. We do not accept human rights violations in any form. Atria also requires its business partners to respect these principles in all their operations and to promote them in practice. Human rights violations must not be tolerated in any form. This means that a business partner shall take action to remedy any adverse human rights impacts it may cause.

CHILD LABOUR

Atria's business partners shall not tolerate child labour or violations to the rights of the child in its operations. Child labour is defined as work that is hazardous to a child's health and development. Usually, child labour interferes with a child's right to education and to play.

Atria's business partners shall respect the rights of children and abstain from directly or indirectly employing children below the minimum age for employment defined in international conventions. If local legislation or local regulations stipulate a higher age limit, this must be observed.

FORCED LABOUR

Atria does not engage in any form of forced, trafficked or other non-voluntary labour. This is also not tolerated in the operations of Atria's business partners. Forced labour includes modern slavery, human trafficking and bonded labour. Forced labour is characterised by two elements: threat of penalty and work or service undertaken involuntarily. Withholding employees' wages or identity documentation is forbidden.

FAIR WORKING RELATIONSHIPS

Atria's business partners shall comply with the requirements of applicable laws, rules and regulations concerning employees' working time and wages. Employees shall be hired based on documented contracts, which specify terms of employment in a language that the employees understand.

Business partners shall comply with applicable laws, international conventions, and industry standards regarding working hours and wages. All overtime hours shall be voluntary. Wage calculations shall be transparent, specifying compensation for overtime separately. Wages shall be paid on time at regular intervals and at least monthly.

Atria's business partners shall not discriminate against applicants or employees based on their race, religion, gender identity, marital or family status, age, political affiliation, nationality, physical ability, sexual orientation, ethnicity or any other dimension of their identity.

Atria's suppliers and business partners shall respect their employees' right to freedom of association and right to collective bargaining.

SAFE WORKING CONDITIONS

We require our business partners to provide a healthy and safe working environment for their employees.

Business partners shall apply workplace risk assessment for all their workplaces and take all the necessary measures to eliminate or reduce identified risks. A routine for reporting, analysing, following up and acting on incidents and accidents shall be implemented. Employees shall be given the necessary and adequate introductory training to their work including relevant information on the health and safety aspects of their daily tasks.

Harassment and abuse shall not be tolerated in any form. Adequate routines for preventive and corrective actions against harassment and abuse and rules for disciplinary actions shall be implemented.

WE CARE FOR OUR ENVIRONMENT

At Atria, we are aware of our environmental responsibility. We respect nature and we are committed to using natural resources sustainably and minimizing the negative environmental impact of our operations throughout the entire value chain. Beside full legal compliance, we also require our business partners to operate in an environmentally responsible way as defined in the Global Compact sustainability principles for the environment.

PREVENTION

We require our business partners to take the necessary measures to protect the environment from degradation and commitment to a preventive approach to solving environmental challenges. This means that our business partners identify and assess potential environmental risks and take measures to minimise them before they become significant problems.

PROMOTING ENVIRONMENTAL SUSTAINABILITY

Business partners must commit to monitoring the environmental aspects relevant to their operations and to the continuous improvement of their environmental performance. Business partners must assess their environmental impacts, such as land use, the use of materials, water and energy in their production and operations. Business partners are expected to systematically manage their environmental performance and to incorporate the systematic application of risk assessment, risk management and risk communication into their operations. Atria encourages its business partners to set science-based environmental and climate targets for their operations using internationally recognised methods.

SUPPORTING THE DEVELOPMENT OF ENVIRONMENTALLY SUSTAINABLE TECHNOLOGIES

For Atria, supporting the development of environmentally sustainable technologies means investing in research and development, cooperating with other companies and research institutes 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.

We expect our business partners to promote their environmental responsibility and continuously improve their environmental performance by encouraging the development and diffusion of environmentally sustainable technologies.

COMPLIANCE

Atria's business partners shall comply with the obligations described in this Atria Supplier Code of Conduct and communicate and train their employees on the content of it. Business partners can either directly use Atria Supplier Code of Conduct or establish and implement their own principles and policies with aligned content. Atria's business partners shall use all reasonable efforts to ensure that their sub-contractors and partners comply or exceed the requirements that are set for business partners in this Atria Supplier Code of Conduct.

WHISTLEBLOWING

Atria's business partners shall implement independent systems for their employees and possible other stakeholders to enable grievances regarding suspected violations of principles described in this Atria Supplier Code of Conduct. The system shall include reporting and management of the grievances as well as protection of the whistleblower. Additionally, the supplier must communicate to their employees the possibility to report misconduct through **Atria's Whistleblowing Channel (atria.com)**.

SUPPLY CHAIN TRANSPARENCY

Legislation in force at any given time, especially in the European Union, requires access to information throughout the supply chain, especially with regard to business sustainability. It is Atria's responsibility to regularly assess and monitor the ability of its business partners to operate in accordance with the requirements. We expect transparency and cooperation from our business partners so that we can meet our due diligence obligations. In practice, this means that business partners must:

- Provide any information requested by Atria in the format and schedule provided by Atria.
- Ensure that corresponding transparency and sustainability obligations apply to their supply chains. Upon request, business partners must demonstrate how they ensure compliance with these obligations in their value chains.
- Intervene and collaborate constructively to address and mitigate any problems identified in the supply chain.

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