

# KOSKISEN GROUP – ETHICAL CODE OF CONDUCT

1 (3)

10.3.2016

## Introduction and targets

The purpose of this Code of Conduct is to ensure that the Koskisen Group (Koskitukki Oy and Koskisen Oy) operates in a long-term, responsible and ethically sustainable manner, taking into account personnel, environmental, financial and other stakeholder needs. The Code of Conduct is based on the company's core values Integrity, Courage, Creativity and Profitability and on its existing approved operating policy. It is complemented, if needed, by more detailed unit and site-specific instructions and regulations that are not in conflict with this Code of Conduct.

The Code of Conduct was approved by the parent company Koskitukki Oy's Board of Directors on 23 March 2015.

## Scope of application

This Code of Conduct applies to all of the Group's units and their personnel. In addition the Group's sales representatives, subcontractors, contractors and suppliers are expected to comply with this Code of Conduct.

## Policies

The Koskisen Group requires its employees to follow working methods that are based on:

- Complying with valid legislation and regulations
- Fair co-operation with co-workers, customers, suppliers and other stakeholders
- A dedicated Koskisen "go the extra mile" attitude and the Group's values
- Customer focus, openness and fairness
- Developing personal work and expertise
- Carrying out work to one's best ability
- Keeping confidential information secret or maintaining it carefully
- The Group's approved responsibility policies and goals

## Integrated management system

The purpose of the Group's integrated management system is to support and enhance the efficiency and capability of the processes. The integrated management system is being developed to meet the international standards (ISO 9001, ISO 14001, OHSAS 18001

and ISO 26000) and its effectiveness is verified through internal audits and external certifying bodies.

The Koskisen Group also regularly assesses the responsibility of its suppliers' and other partners' operations.

## Human rights

As a Group we respect the UN's Universal Declaration of Human Rights.

The Group has also signed the Diversity Charter of the Corporate Responsibility Network FIBS, which is a promise to develop leadership and service practices. In the Charter we promise to

- Offer equal opportunities
- Recognise and utilise individual expertise and needs
- Lead our personnel and customer relationships fairly
- Communicate our goals and achievements

We do not accept the use of child labour or forced labour, nor do we accept any discrimination based on ethnic origin, age, gender, nationality or sexual orientation.

## Personnel

Continuous attention is paid to the Group's personnel's operating conditions, development of know-how, well-being at work and investments in health. Supervisors' behaviour and attitudes are expected to comply with the values and they are expected to make fair decisions. Quality, safety and environmental aspects are a key component of orientation and each employee is expected to take responsibility for developing these. Equality is a highly regarded value in the Group and improving it is an essential part of the HR policy and the development of personnel's well-being at work. The Group's equality plan steers practical implementation.

Koskisen ensures that no employee is subjected to bullying, discrimination, sexual harassment or any other type of harassment. The terms of employment contracts and working conditions are based on equality and fairness.

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## Customer/Sales

Contracts with customers are confidential. We act fairly and with integrity, and treat our competitors and their work with professional courtesy.

We comply with product requirements and standards, and with ethical codes throughout the order-delivery chain, and our products and services are traceable and their origin is known. The goal of our product development work is to develop product characteristics that comply with responsible and sustainable development.

## Suppliers

Koskisen Oy requires all of its suppliers and subcontractors to comply with applicable laws and international agreements, to respect human rights and to commit to Koskisen Group's ethical principles. We seek reliable, respectful and mutually beneficial relationships with our suppliers.

We expect all of our suppliers to respect unconditional non-disclosure agreements and intellectual property rights.

We expect suppliers to invest in the continuous improvement of their products and services, and in their ability to transform and innovate, as well as in increasing the efficiency of their manufacturing process and expertise.

In its procurement, Koskisen Oy favours products and services that comply with sustainable development.

We make payments to suppliers on time. Suppliers are not allowed to offer Koskisen Oy's personnel any personal benefits.

## Safety

Our occupational health and safety activities meet the statutory requirements as a minimum.

Efforts are made to prevent, as well as possible, safety and security risks related to personnel's health and safety, to the products and their use and to the company's assets and operations.

The Group's task is to create the framework, policies and targets for a safe work community. Each employee is responsible for his or her own safety, for following instructions and developing operations to make them safer for everyone and also for taking care of the safety of co-workers and the company's property.

The state and improvement of safety are monitored systematically using pre-emptive and "near miss" observations.

The Group's partners, suppliers and visitors are expected to comply with the Group's safety regulations without exception, and non-compliance will be addressed immediately.

## The environment and wood procurement

Environmental matters are a question of honour and a competitive asset. We aim to continuously reduce the load caused by our operations on the soil, water and air. The development of products and production processes aims at minimising environmental loads over their entire lifecycle.

Environmental aspects are assessed carefully also as regards direct and indirect procurement and when selecting suppliers. Communications concerning incidents, legal action or development concerning the environment takes place openly and systematically.

The origin of wood is always known, whether it comes from a certified or uncertified forest. The Group has PEFC's and FSC®(C116522)'s chain-of-custody certifications for wood, which ensures that the wood does not originate from controversial sources, such as:

- Illegal logging
- Logging that violate indigenous peoples' rights or other human rights
- Forests where environmental values have been threatened or destroyed
- Natural forests that have been transformed into plantation forests
- Forests containing genetically modified trees

## Responsible way of operating

Koskisen Group operates in accordance with the principles and practices of social responsibility based on the guidelines laid down in the ISO 26000 standard. Our objective is to abide by the principles of sustainable development in everything we do.

The use of corruption, bribes and illegal payments is prohibited in the Group's operations.

The Group pays the travel and accommodation expenses of its representatives on visits to customers, suppliers, seminars and training events. Reasonable hospitality and

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giving and receiving small gifts in the course of normal business is allowed.

No conflict of interest may exist between the Group's personnel and suppliers or other stakeholders based on family relations.

Koskisen Group does not support political groups.

The Group's employees are expected to carefully look after the company's property and to maintain confidential information in an appropriate manner that serves the company's interest.

### **Implementation of and compliance with the Code of Conduct**

The Group's top management and everyone in a supervisory position must, through their own example, ensure the implementation of this Code of Conduct. Supervisors are also responsible for the ways of working of their employees. Reporting any noncompliance with this Code of Conduct is the responsibility of each employee. A report must be submitted as early as possible to the closest supervisor.

On the part of suppliers and other stakeholders a report must be filed immediately in cases of noncompliance and this also requires them to take corrective action. In extreme cases noncompliance with the Code of Conduct and/or neglect to carry out a corrective action is a basis for the termination of a contract.

Responsibility for compliance with the Code of Conduct lies ultimately with the Group's Managing Director.