

K.HARTWALL

Logistics Efficiency through Innovation

K.Hartwall Code of Conduct

Ethics and Compliance

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Message from our CEO

Dear colleagues at K. Hartwall,

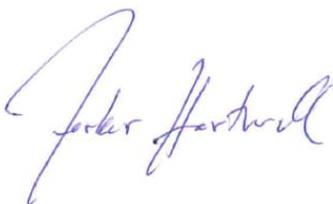
Integrity has always been a key driver in the success story of K. Hartwall. Our values Reliable Partner, Driving Progress and Open Communication have served us well and worked to improve our relationship and build trust with our valued customer base. Ultimately this converts into a sustainable, robust and profitable business, the fruits of which we all get to enjoy. Every single one of us plays an important part in upholding our values in our day-to-day tasks.

To support all of us in our daily work we have formulated a new Code of Conduct -policy and I am pleased to present it to you. The purpose of this Code of Conduct is primarily to ensure that all employees of K. Hartwall have a common framework and consistent standpoint on how K. Hartwall conducts its business globally.

In addition to supporting us internally, this Code of Conduct is open and public information to all Customers of K. Hartwall, providing valuable insight on how we handle compliance, take care of each other and the environment as well as how we protect ourselves. The principles and guidelines outlined in this Code of Conduct showcase how we conduct ourselves as a company.

In this Code of Conduct, we provide guidance on several ethical issues such as Complying with the Laws, Refusing Bribery, Safeguarding Proprietary and Confidential Information and Fulfilling the Environmental Responsibility in K. Hartwall's business.

It is crucial that this Code of Conduct is well communicated and readily available to all K. Hartwall employees. It is the responsibility of everyone working for K. Hartwall to read and familiarise themselves with the content of this Code of Conduct. Additionally, all comments and feedback are highly appreciated to maintain this Code of Conduct up-to-date and to meet the demands of the constantly changing business environment.



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1 SCOPE AND PURPOSE

1.1 Scope

This Code of Conduct applies to all K. Hartwall employees, managers, directors and officers globally and covers all K. Hartwall subsidiaries. Each of us working for K. Hartwall is responsible for knowing and understanding the principles and directions outlined in this Code of Conduct and the related supplemental policies. Breaching this Code of Conduct or any of the supplemental policies may lead to disciplinary actions.

The principles of this Code of Conduct also apply to suppliers, agents, distributors and other business partners providing goods or services to K. Hartwall or acting on our behalf. These third parties are contractually bound to comply with a separate **Business Partner Code of Conduct** -policy, which includes more detailed requirements and instructions.

1.2 Purpose

This Code of Conduct acts as guidance for all personnel working for K. Hartwall on how to conduct business ethically, fairly and with integrity. It aligns our actions towards a common goal and sets a baseline which all of us need to follow to build an enjoyable working environment and to build and maintain the trust of our valued customers and partners. It echoes our core values: Reliable Partner, Driving Progress and Open Communication, building upon the same foundation and communicating our resolve to live up to these values.

K. Hartwall is committed to remaining fully compliant with all laws and regulations applicable to its actions. This Code of Conduct does not intend to override or substitute any local norms. In addition to laws and regulations, K. Hartwall strives to respect the culture and practices of the countries in which it operates. However, in any situation where local cultural norms and this Code of Conduct may collide, this Code of Conduct prevails as the appropriate guidance and must be followed.

KEY TAKEAWAYS

Upholding the values and integrity of K. Hartwall starts with each individual working for the group. Your responsibilities:

- *Read and understand this Code of Conduct*
- *Act according to this Code of Conducts*
- *If possible, avoid situations where you might be asked or pressured into actions breaching this Code of Conduct*
- *If in doubt, ask – contact your manager, BU head, CEO or HR if a situation does not feel right to you*

2 COMPLIANCE WITH LAWS

K. Hartwall as a group always complies with all global and local laws and relevant regulations applicable to it. This requirement applies to every individual working for K. Hartwall, as well as to every Agent, Partner and Supplier providing materials or services to K. Hartwall or acting on behalf of K. Hartwall.

K. Hartwall also complies with all national and international Intellectual Property Rights (IPR) legislation, preventing illegal copying of technologies and products. K. Hartwall actively defends its own IPR, benefitting in this way its customers and partners by protecting them from illegal, uncontrolled and irresponsible copying of the new efficiency innovations.

2.1 Refusing Bribery and Fighting Corruption

K. Hartwall defines a bribe as a payment or offering of goods, services or anything of value, offered with the purpose of gaining an unlawful and dishonest advantage. Any kind of bribery within K. Hartwall business operations is strictly forbidden. This rule applies both ways, i.e. to both receiving or asking and giving or offering of bribes. We do not offer any bribes and reject all requests or offers of any bribes.

Within the business world, giving and receiving of small business gifts is in general a legitimate part of creating goodwill between business partners and building business relationships. However, as a general rule, gifts given or received shall always be modest and shall never be offered or received if it can make the recipient feel obligated or expected to give counter favors. The same principle as with gifts applies to entertainment as well, such as dinner invitations, entertainment shows, trips, courses and client events. Special care must be taken when communicating or conducting business with regulators and public officials. We do not offer or accept inappropriate gifts or entertainment.

In certain parts of the world it might be commonplace or expected to offer unofficial payments or gifts to expedite or facilitate activity or transaction by a service provider, public official or other such third party. These kinds of payments are known as facilitation payments or "grease payments" and, as such, are strictly forbidden. We will not pay or offer to pay facilitation payments.

We refrain from making any political contributions or donations without careful consideration by the CEO.

We must, as individuals working for K. Hartwall, report internally to the appropriate person all requests, offers, insinuations and demands for bribes, inappropriate gifts or entertainment, facilitation payments or political contributions or donations that we reject based on the guidance above.

More specific guidance and advice is provided in the supplemental **Anti-Bribery and Anti-Corruption Policy**, which everyone working for K. Hartwall must read and follow.

KEY TAKEAWAYS

We must remain vigilant in resisting and refusing any form of bribery or corruption related to our work. Your responsibilities:

- *Read and familiarize yourself with the Anti-Bribery and Anti-Corruption Policy*
- *Do not offer or request any bribes and reject any request or offers for any bribes*
- *Do not offer or accept any inappropriate gift or entertainment*
- *Do not agree to any political contribution or donation without CEO approval*
- *Be especially careful when dealing with regulators and public officials*
- *Report any request, offers, insinuations and demands for any actions you reject or find suspicious*

2.2 The Way K. Hartwall Competes

Competition and anti-trust laws apply in many countries in the world and especially in most countries where K. Hartwall does business. Violation of these laws can result in significant penalties on the company and in many cases, the individuals concerned.

K. Hartwall is committed to lawful, straightforward and ethical competition. It is our policy to ensure that our business practices fully comply with the competition laws wherever we do business. The legislation related to competition is vast and complex and more detailed guidance is available in the **Competition Compliance Policy**.

The most critical business activities to avoid and refuse are:

- Price Fixing – Formal or informal agreements with competitors to price levels
- Term Fixing – Formal or informal agreements with competitors to terms of supply
- Bid Rigging – Coordination of bidding process with competitors to pre-determine the winning bid
- Market Sharing – Agreeing on allocation of customers or territories with competitors
- Limiting Supply – Agreeing on limiting production or restricting availability of goods or services
- Oversharing Information – Disclosing sensitive commercial information with competitors about pricing, customers, discounts, volumes or the like

It is best to keep contacts to and communication with competitors on a minimum level. Pay special attention to any activities and discussions in trade associations or similar frameworks. If a situation arises that bears any resemblance to the forbidden arrangements listed above, do not continue the discussion and report the situation immediately to the CEO or CFO. An appropriate response will be formulated together with you to effectively end the discussion and reduce the risk of negative repercussions to K. Hartwall.

KEY TAKEAWAYS

We must refrain from all inappropriate contacts, information sharing and agreements that might restrict competition. Your responsibilities:

- *Read and familiarize yourself with the Competition Compliance Policy*
- *Do not share business information with competitors or agree upon any pricing, delivery term, supply or market sharing issue*
- *Be especially careful when discussing in trade associations or similar forums*
- *Contact the CEO or CFO immediately if you encounter any situation that touches upon the above topics and stop or leave the conversation*

2.3 Privacy

K. Hartwall stores and processes a lot of data that can be linked back to an individual person, constituting personal data. K. Hartwall will protect the right to privacy of employees and other stakeholders. Data and other information about K. Hartwall employees or other stakeholders will be kept confidential and not used without their consent save where permitted or required by law.

We will not collect, access or use any personal data without a valid and lawful reason. We do not use any personal data for purposes that are incompatible with the information given to or permission received from the data subject. We will not disclose any personal data outside of our organization unless we are allowed to do so by law and upon doing so we shall ensure that there are sufficient safeguards in place to ensure the data is processed and protected legally at the recipient. An overview of our privacy and data protection measures is available at <https://k-hartwall.com/privacy/>.

KEY TAKEAWAYS

We are responsible for the proper use and protection of the personal data in our possession. Your responsibilities:

- *Do not use any personal data from K. Hartwall registries for purposes for which it was not meant to be used*
- *Do not disclose any personal data outside K. Hartwall without ensuring proper measures being taken to protect it*
- *Contact privacy-khw@k-hartwall.com if you are unsure how to handle a particular situation concerning personal data*

3 TAKING CARE OF OTHERS AND THE ENVIRONMENT

We want to make sure we offer a safe and fair workplace for all our employees. We also want to conduct our business in responsible and environmentally sustainable way.

3.1 The Labour Ethics and Human Rights

Complying with international standards, such as ILO Declaration on Fundamental Principles and Rights at Work is self-evident for us. K. Hartwall explicitly prohibits the use of child- or forced labor in any of K. Hartwall's own operations and require those of K. Hartwall partners and suppliers to act similarly. K. Hartwall will respect freedom of association and the right to collective bargaining for K. Hartwall employees, in accordance with the law or practice of the countries in which K. Hartwall operates.

We do not accept any form of discrimination, whether based on ethnicity, gender, religion, nationality, age, sexual orientation, gender identity, disability or any other factor. We have a zero-tolerance approach towards any form of harassment such as bullying, humiliation or threatening conduct. Improper workplace conduct, such as inappropriate comments, gestures or sexual innuendos are not tolerated.

We encourage our employees who have been subject to or witnessed improper workplace conduct to report the matter either through HR, their manager or the anonymous whistleblowing channel.

KEY TAKEAWAYS

We need to always act with respect and integrity. Your responsibilities:

- *Do not act in a way that your co-workers might find improper*
- *Stop any improper conduct at the workplace if you feel comfortable doing so*
- *Report all improper or inappropriate conduct you experience or witness to HR, your manager or anonymously through the Whistleblowing tool*

3.2 Health & Safety in our Business

K. Hartwall regards Health and Safety rules and procedures as a fundamental aspect in all K. Hartwall activities. We strive to achieve the highest standards of incident-free work conditions in our own operations and demand the same from our partnered production, development and sales operations.

We will never compromise on the health on safety of our employees for business reasons. No task is important enough to compromise health and safety. We all need to remain aware of the safety concerns of our tasks. If a safety concern is identified, all affected work should be stopped until corrective action has been taken to resolve the identified safety concern. All incidents and near-miss situations need to be reported so that the overall safety of the workplace can be improved upon.

KEY TAKEAWAYS

We are responsible for keeping ourselves and each other safe at work. Your responsibilities:

- *Be mindful of the safety aspects of your work at all times*
- *Stop work if you are concerned about your safety conducting your tasks*
- *Inform your superior and report all incidents and near-miss situations through the web application*

3.3 Fulfilling the Environmental Responsibility

We are committed to conduct our business in an economically sustainable way and to minimize our impacts on our surroundings. K. Hartwall strives to reduce the environmental impact of its operations by reducing resource consumption, discharges, waste volumes and alike, and K. Hartwall acts environmentally responsible in all their operations.

K. Hartwall complies or exceeds the requirements of all applicable laws and regulations regarding its environmental impact. We are proud to be certified with the ISO 14001 certificate related to environmental management.

Every K. Hartwall employee and partner has the same individual responsibility to consider the environmental impacts in his or her work. This includes the obligation to act, either directly or by reporting to K. Hartwall management, whenever a violation against environmental policy, law or regulations is occurring or suspected.

KEY TAKEAWAYS

We strive to minimize the negative impacts of our actions to our surroundings. Your responsibilities:

- *Be mindful of the environmental impacts of your work and try to limit them*
- *Stop and/or report any unwarranted negative impact to the environment you notice in your work*

4 PROTECTING K. HARTWALL AND ITS ASSETS

4.1 Safeguarding Proprietary and Confidential Information

In business relationships with customers, partners or other stakeholders, K. Hartwall receives and produces proprietary and confidential information to be able to fulfil the requirements of the relevant business contacts and agreements. K. Hartwall complies with all applicable laws and regulations protecting such proprietary and confidential information and honors all agreements pertaining to the matter.

Detailed procedures concerning identification, handling and disclosing of proprietary and confidential information shall be agreed upon in separate Non-Disclosure Agreements made and communicated between K. Hartwall and their customers, partners or other stakeholders.

Information, data and intellectual property rights are a valued asset of K. Hartwall and safeguarding it is essential for our business. Protected proprietary and confidential information includes for instance:

- Trade secrets and know-how, product concepts and drawings, innovations
- Business strategies, business ideas, processes, plans and proposals
- Capacity and production information, construction plans
- Marketing or sales forecasts and strategies, Customer information
- Price lists
- Partner and Supplier data

We must each take care in handling and storing the proprietary and confidential information trusted to us. We need to understand what information we are receiving, storing and sharing and for what purpose. All disclosures of such information and data to parties outside of our organization must be preceded by an agreement for its protection. No disclosure of proprietary and confidential information should take place without first paying attention to the above.

KEY TAKEAWAYS

We must protect our valuable information and ensure that we respect the confidentiality obligations related to the information disclosed to us. Your responsibilities:

- *Do not disclose proprietary and confidential information without a proper Non-Disclosure Agreement or similar arrangement*
- *Keep track of how the proprietary information of third parties disclosed to us is stored, who has access to it and how it is used – adhere to the applicable contracts*
- *Do not disclose any particularly sensitive data without authorization*

4.2 Measures Against Theft, Fraud and Conflict of Interest

We at K. Hartwall conduct our business with integrity and honesty and resist any forms of fraud, whether within our organization or upon coming across fraudulent actions by third parties. We communicate openly with our employees, customers and other stakeholders. We do not tolerate theft, embezzlement or other misuse of our assets and property.

We store and protect all K. Hartwall property and assets with due care and use it solely for purposes related to our work. We ensure all financial transactions are based on actual business events covered by appropriate agreements and that our records are kept accurately and following accounting standards.

In case your own interests conflict with your work-related responsibilities, you should not let your personal interests affect business decisions. You are expected to act according to the best interest of K. Hartwall and try and avoid any conflict of interest. If you can not avoid a conflict of interest, you should disclose it to HR or your manager and ask to be excluded from decision making in the matter.

KEY TAKEAWAYS

Every one of us is responsible for acting diligently and with integrity while dealing with company assets. Your responsibilities:

- *Take care of company property as if it was your own*
- *Make sure that all transactions follow a sound business logic and are based on an agreement or other valid arrangement*
- *Follow all decision-making guidelines and escalation steps*
- *Always act in the best interest of K. Hartwall and avoid any conflicts of interest*

5 SUPPORT AND REPORTING OF ISSUES

5.1 Support From the Organization

After reading and understanding the guidelines in this Code of Conduct, you should be able to recognize situations where you need to take action to comply. You can always approach your direct manager, BU Head or CEO with any concerns you might have based on this Code of Conduct.

5.2 Guidelines for Decision Making

Decisions are often complicated and multi-faceted and sometimes there is no clear answer as to what the correct way to act is. Whenever you come across a situation you are not sure how to handle, ask yourself the following questions:

1. Does this action **feel** right to you?
2. Is the action or decision **legal** and does it follow our **policies and values**?
3. Are you sure there is no **alternative action** to avoid potential problems?
4. Could you **confidently** tell your close friends or relatives of your action?
5. Would you be comfortable reading about the action in the **news or social media**?

If the answer to all the questions above is yes, then the action you are about to take is the right one. If you answer no to any of the questions, stop and think and, if needed, ask for support.

5.3 Reporting Problems

K. Hartwall encourages all persons working for us to step up and speak up about any wrongdoing they come across in their daily work. It is also in the best interest of the group to foster a culture of open and honest communication, which is why we want you to feel safe and supported in raising any concerns. We understand it might be difficult and stressful, which is why we have implemented a channel for you that you can use anonymously if you so prefer. K. Hartwall does not tolerate any form of retaliatory actions taken against a person reporting a breach of this Code of Conduct or any other K. Hartwall policy in good faith.

How to report any issues:

- Direct contact to your manager, HR, CFO or CEO
- Whistleblowing channel at <https://k-hartwall.ilmoituskanava.fi>
- Privacy -related matters to privacy-khw@k-hartwall.com
- H&S observations via Falcony web application

6 IMPLEMENTATION OF THIS CODE OF CONDUCT

As said above, this Ethics Policy Statement applies to all K. Hartwall employees and anyone acting on our behalf, such as agents, distributors and partners. All those who act on behalf of K. Hartwall will be provided and asked to comply with the Business Partner Code of Conduct. The obligation to comply with the Business Partner Code of Conduct needs to be incorporated into all contracts with relevant third parties.

The Owner of this Code of Conduct is the CEO of K.Hartwall. It is reviewed annually in the Global Management Team (GMT) and updated accordingly when necessary. Each new version of this Code of Conduct will be approved by K. Hartwall GMT. This version was updated in October 2022.