

walki

# Our Code of Conduct



**WALKI GROUP OY**  
**21.8.2018**



## **Walki Group's Code of Conduct**

We comply with this Code of Conduct in all our business operations in all the countries in which we operate. The Code of Conduct describes all the principles our employees follow and the values our company holds and promotes. Every employee regardless of their position is committed to complying with the Code of Conduct in for example decision making, business development, investments and subcontracting. We also expect and encourage all our business partners to operate responsibly and in compliance with our separate Supplier Code of Conduct.

### **COMPLIANCE**

We and our employees consistently comply with all applicable laws and regulations. We follow international standards, such as the Universal Declaration of Human Rights and Core Conventions of the International Labor Organization. All employees are expected to show professionalism, adhere to the good practices of business, and demonstrate environmental and social responsibility. All employees are expected to act in the company's best interest.

All our business partners are required to comply with the law. We do not condone any breach of law or do we condone being complicit in any breach of law. We attempt to always interact directly with our suppliers without the involvement of third party agents or other third parties. We value long-lasting partnerships with our suppliers, business partners and customers.

### **BRIBERY AND ANTI-CORRUPTION**

We do not accept any form of bribery or corruption. We and all our employees comply with all applicable laws and regulations in relation to anti-corruption and bribery. We promise not to pay or pay bribes or any other forms of illegal payments or benefits to authorities or anyone else directly or indirectly – through a third party acting on Walki's behalf. We do not advice or incite to anyone to offer or accept them either.

We do not tolerate any form of money laundering. We and all our employees comply with all laws and regulations in relation to money-laundering, terrorist financing and any other illegal activities as well as applicable sanctions

### **HUMAN RIGHTS**

We are committed to respecting internationally recognized human rights. We do not tolerate human rights violations in any form. We require that all of our partners also respect all internationally recognized human rights.



We do not tolerate discrimination or harassment. We treat our employees with dignity and treat everyone equally in recruitment, opportunities, compensation, career progress and termination. We treat all our employees equally regardless of for example, but not limited to race, gender, color, religion, sexual orientation, ethnicity, national origin, age or physical ability. Bullying, sexual harassment of any kind and any other form of in-appropriate behavior is not tolerated.

We do not tolerate or accept any form of human trafficking or modern slavery. Our employees working with transport are required to ensure that human trafficking does not occur during transportation of products.

### **LABOR RIGHTS**

We focus on the safety of all our employees. We work to protect and prevent accidents, illnesses and work-related injuries and to ensure the health and safety of all our employees, subcontractors and other visitors at Walki premises. We promote wellbeing and a wellbeing work environment for our employees.

We treat our employees equally and comply with applicable labor laws. We comply with the ILO Declaration on Fundamental Principles and Rights and ILO Core Conventions. We always comply with local work legislation and local collective labor agreements.

We respect our employees' freedom of association, collective bargaining and the right to form trade unions. We always follow in relation to working hours, wages, benefits and overtime compensation national legislation and applicable collective agreements.

We do not accept any form of child labor, bonded labor or forced labor.

### **FAIR COMPETITION**

We do not take part in activities that negatively affect or in any way restrict fair competition. We comply with all applicable competition laws. We do not accept any illegal or restricting business methods.

Our employees are required to inform without delay of any condition which could be or could be perceived as a conflict of interest. Conflict of interests can also include, but not limited to, personal benefits and benefit to the person's family. Employees shall not seek personal gain, nor assist others to profit, from opportunities that are discovered through the use of corporate property, information and position. Commitments on behalf of Walki where an employee has an actual or potential conflict of interest, for example due to close personal relationships, must be referred to an employee's superior for approval.

### **GIFTS AND HOSPITALITY**

Any personal gifts or hospitality must be consider of little value and common. Accepting or giving a gift or hospitality cannot lead to any kind of relationship with dependency between the parties. We comply with all laws and standards issued on giving and accepting gifts and applicable standards are assessed in accordance with the legal requirements of each jurisdiction.

All donations to charities and other non-governmental organizations are decided by the Walki Group Executive Team. We do not make any donations in cash. We do not support any political parties.



We respect our company's assets and use these assets with care and only for legitimate business and authorized purposes.

### **CONFIDENTIALITY**

We comply with the strictest rules, applicable regulation and best practices of confidentiality and privacy. All our employees handle all confidential information with the highest level of confidentiality. We ensure that confidential information is not passed to third parties.

Personal data and personal information is strictly confidential information. We comply with the General Data Protection Regulation (GDPR) and all other applicable national laws in relation to personal data. Personal data is processed and stored only for approved business purposes and employees may not disclose personal data without lawful justification.

### **ENVIRONMENT**

We comply with applicable environmental laws. We respect the environment and promote sustainable development, production and consumption. We believe in the circular economy. Our aim is to provide the world with materials that are non-fossil based and fully recyclable. Walki Group focuses on the minimizing of raw materials, emissions, waste, use of energy and overall carbon footprint. All our employees are encourage to attempt to act energy-efficiently, recycle and make environmentally friendly decision.

### **IMPLEMENTATION**

All employees are responsible for acting in compliance with this Code of Conduct. All Walki employees are responsible for reporting immediately any suspected or detected grievances and violations of this Code of Conduct. Such reporting should be done directly to the CR Committee by using the anonymous contact form on the company's website or by using email address: WAL x CR Committee (WAL.x.CR.Committee@walki.com).

Suspected violations of the Code are investigated and resolved by CR Committee.