

A photograph of two men in a forest. On the left, a man with short brown hair and glasses, wearing a grey zip-up hoodie, is smiling and looking towards the other man. On the right, an older man is dressed in full logging gear, including a red helmet with a clear face shield and a 'H' logo, large black earmuffs, an orange long-sleeved shirt, and a black safety harness. He is holding a smartphone in his gloved hands and looking down at it. The background is a dense forest with green trees and foliage.

THE TORNATOR ATTITUDE

INSTRUCTIONS
FOR HONEST WORK

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**You can find the online training version
of our Code of Conduct at**

<https://lms.tornator.fi/en>

*Test how well you know the
principles of honest work and
how you would handle any
difficult situations you might face.*

AN HONEST WORKING ATTITUDE



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Test how well you know the principles of honest work and how you would handle any difficult situations you might face.



GREETINGS FROM THE CEO



Dear Tornator staff,

The world has changed quite a bit since Tornator was founded. Many things that were perceived as a natural part of business operations may no longer be acceptable. In the event of a change in policies and standards, our Code of Conduct also needs to be updated.

For many people, responsible business guidelines simply mean acting honestly and fairly. And that is correct. For most of us, common sense works quite well in steering us towards right and fair solutions.

However, there are sometimes situations in business life where one cannot always be sure whether an activity is in line with the company's policies or not. For these more difficult cases, we have developed the Code of Conduct to assist all Tornator employees. As regards the Code of Conduct, the company also regularly organises online training for all its personnel. The purpose of the new updated guidance is to facilitate managerial work and prevent unpleasant situations. In other words, it is a part of risk management.

It is also essential that our employees feel able to express their concerns and can count on Tornator to take the appropriate action if necessary. It is always possible to report suspected abuses or other concerns anonymously using the whistleblowing notification channel provided by an external operator for Tornator.

The daily activities and choices of each Tornator employee are relevant to our culture of honesty. A responsible business culture lays the foundation for the company's long-term success. It is the responsibility of all of us to ensure that Tornator maintains honest and responsible business operations that we can all be proud of.

Best regards,
Henrik Nieminen
CEO

COMMON RULES TO GUIDE US

Tornator's mission is to create sustainable well-being from forests. We practise long-term forestry and have been a straightforward and honest operator throughout our history. For us, this means a reliable and responsible approach towards our employees, customers, owners and other stakeholders.

Each of us sometimes encounters difficult situations where choosing the right course of action is not a simple or obvious matter. It is important that we all know how to identify such situations. This Code of Conduct helps us choose the right course of action when there is no instructions or internal rule, or the rules are unclear. You can always turn to your supervisor for further guidance — don't be left worrying!

The principle of acting with integrity is part of all our operations, both as a company and as individuals. By doing the right thing, we earn the trust of our customers and other stakeholders. At the same time, we ensure that we can be proud of what we do on a daily basis and that the company's attractiveness as an employer is maintained and made known outside the company.



OUR COMMON RULES

- 1 **WE COMPLY WITH LAWS AND REGULATIONS**
- 2 **WE HAVE ZERO TOLERANCE FOR CORRUPTION**
- 3 **WE KNOW OUR PARTNERS AND PLAY FAIR**
- 4 **WE PROTECT OUR COMPANY'S ASSETS AND RESPECT PRIVACY**
- 5 **WE TAKE CARE OF THE PEOPLE AROUND US**
- 6 **WE TAKE CARE OF FORESTS AND OUR ENVIRONMENT IN GENERAL**
- 7 **WE COMMUNICATE TRANSPARENTLY AND PROMPTLY**

These rules specify how we treat each other and the forests, and how we work together and take care of Tornator's assets and the assets that the company has been entrusted with to manage. We ensure that every Tornator employee has a shared understanding of the practices and ethical principles to be followed. We follow our Code of Conduct in all our business operations within the company and with stakeholders and the society as a whole.

This code applies to Tornator employees, directors and board members. We also require that our contractors, service providers and other contractual partners operate in accordance with this Code of Conduct. The starting point is that all Tornator personnel and our contracting partners work in a uniform manner, responsibly and ethically.

The individual policies and guidelines of Tornator supplement this Code of Conduct and must not conflict with it.

- Principles of corporate governance
- Data security and data protection policy
- Communication map and communication rules
- Environmental principles

The principle of acting with integrity is part of all our operations, both as a company and as individuals.



EVERY TORNATOR EMPLOYEE MUST

- Familiarise themselves with the Code of Conduct and follow it
- Always seek advice from a supervisor or member of management in case of doubt
- Bring suspected abuses or other concerns to light and report abuses through the notification channel.

In addition, Tornator supervisors should

- Lead by their own example in words and deeds
- Communicate the rules and procedures to those reporting to them and discuss what they entail in practice
- Identify and prevent risks
- Promote and maintain an atmosphere in which every Tornator employee can share their concerns
- Listen to employees' concerns
- Report suspected abuses that have come to their attention;
- Instruct and supervise employees in complying with the above obligations.

VALUES AND RESPONSIBILITY GUIDE OUR OPERATIONS



You can find the online training version of our Code of Conduct at <https://lms.tornator.fi/en>

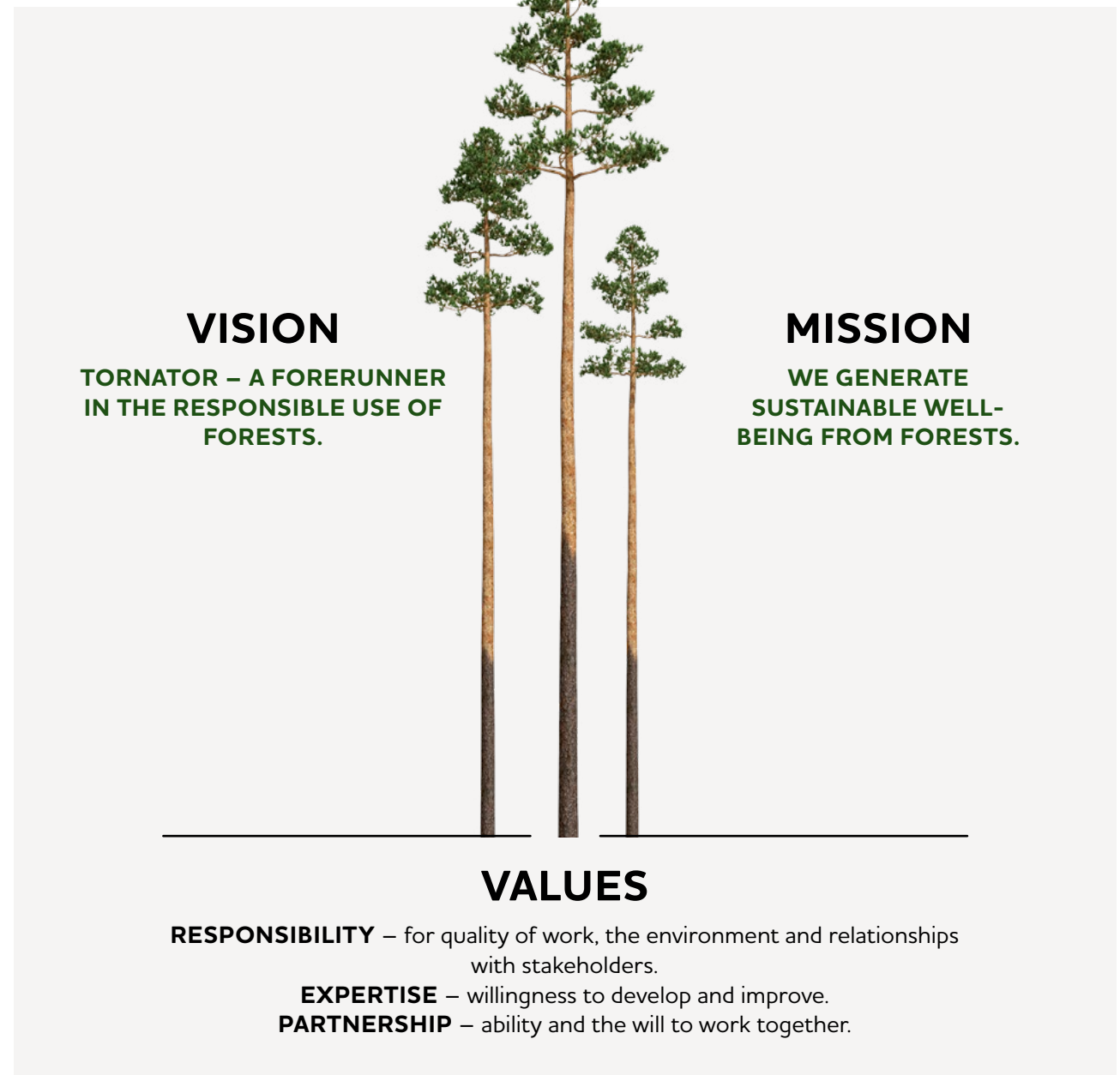
Test how well you know the principles of honest work and how you would handle any difficult situations you might face.



VISION, MISSION AND VALUES

Through joint workshops with our staff, we have developed and chosen for Tornator a vision, mission and values. We work in an expert organisation where the work sites are far apart and where the skills and professionalism of our personnel are an important asset: in order to succeed, we need a wide range of skills, seamless cooperation and partnership.

Values have a special meaning in our everyday lives. They are the backbone of our corporate culture and guide our honest activities – even unconsciously. We encourage everyone to consider what behaviour is in line with the company's values and how these values can be promoted in each person's own work.



WE CONDUCT RESPONSIBLE BUSINESS OPERATIONS

Tornator's responsibility vision is to be an expert in sustainable forestry, a progressive and safe workplace, and a productive promoter of well-being in its field. The three responsibility themes are based on a materiality analysis conducted in 2017, in which we interviewed internal and external stakeholder representatives about their views of the company's key areas of responsibility.

Based on the materiality analysis, Tornator's key responsibility themes are sustainable utilisation of natural resources, economic responsibility and profitability, employee satisfaction, health and safety as well as open communication and stakeholder relationships.

Tornator supports the United Nations Sustainable Development Goals (SDGs) and has identified six key goals regarding its own business and stakeholders. Key sustainable development goals, in terms of the impacts of Tornator's and its stakeholders' operations, are:

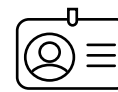
- Clean water and sanitation
- Decent work and economic growth
- Climate action
- Life on land
- Peace, justice and strong institutions
- Partnerships and cooperation

TORNATOR – THE FORERUNNER IN RESPONSIBLE USE OF FORESTS



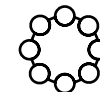
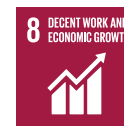
AN EXPERT IN SUSTAINABLE FORESTRY

- We work sustainably, considering the ecological values of commercial forests.
- We protect valuable habitats and promote biodiversity, minimising the environmental impacts of our operations.
- We improve water quality by ensuring water protection and by restoring small waters.
- We demonstrate sustainability through independently verified forest certification.
- We maintain the carbon sequestration capacity of forests with good forest management and sustainable harvest planning.



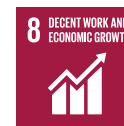
A PROGRESSIVE AND SAFE WORKPLACE

- We care for the safety and well-being of employees and contractors.
- We keep employee satisfaction high.
- We strive for good leadership and transparent decision making.
- We invest in the training and development of employees and contractors.

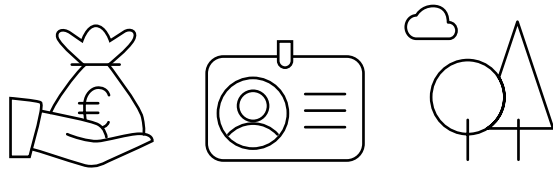


A PRODUCTIVE PROMOTER OF WELL-BEING

- We grow profitably, improve our efficiency and ensure excellent governance.
- We generate well-being through taxes and jobs all over our operating area.
- We are a responsible and long-term partner and help our partners to develop their business.
- We collaborate locally, nationally and internationally with an extensive group of stakeholders.



ETHICAL PRINCIPLES, GOOD GOVERNANCE, OPEN COMMUNICATION AND DIALOGUE WITH STAKEHOLDERS



For Tornator, responsibility means reconciling the company's own objectives and expectations with those of our stakeholders. The importance of responsibility and sustainability has been further strengthened among the various stakeholders; for example, owners expect these considerations to be taken into account at every level from the financial strategy onwards. Responsibility strongly guides Tornator's management practices and their planning. The company is committed to responsible operations through both internal and external principles.

Tornator's operations are determined by the laws of the countries of operation, the company's internal Code of Conduct (i.e. this document), environmental principles and external criteria set by the certification schemes of the Programme for the Endorsement of Forest Certification (PEFC) and the Forest Stewardship Council (FSC®).

At group level, Tornator's corporate responsibility is coordinated and instructed by the CEO, assisted by the management team and the corporate responsibility manager. The implementation of responsible and sustainable practices is also the responsibility of those in charge of business operations. Implementation is assessed through internal controls, external audits and auditing.

Trademark licence codes: Finland FSC-C123368, Estonia FSC-C132610, Romania FSC-C132426



Read more about our responsibility programme and our more detailed goals [in our annual report](#).

Read more about the UN Sustainable Development Goals [here](#).

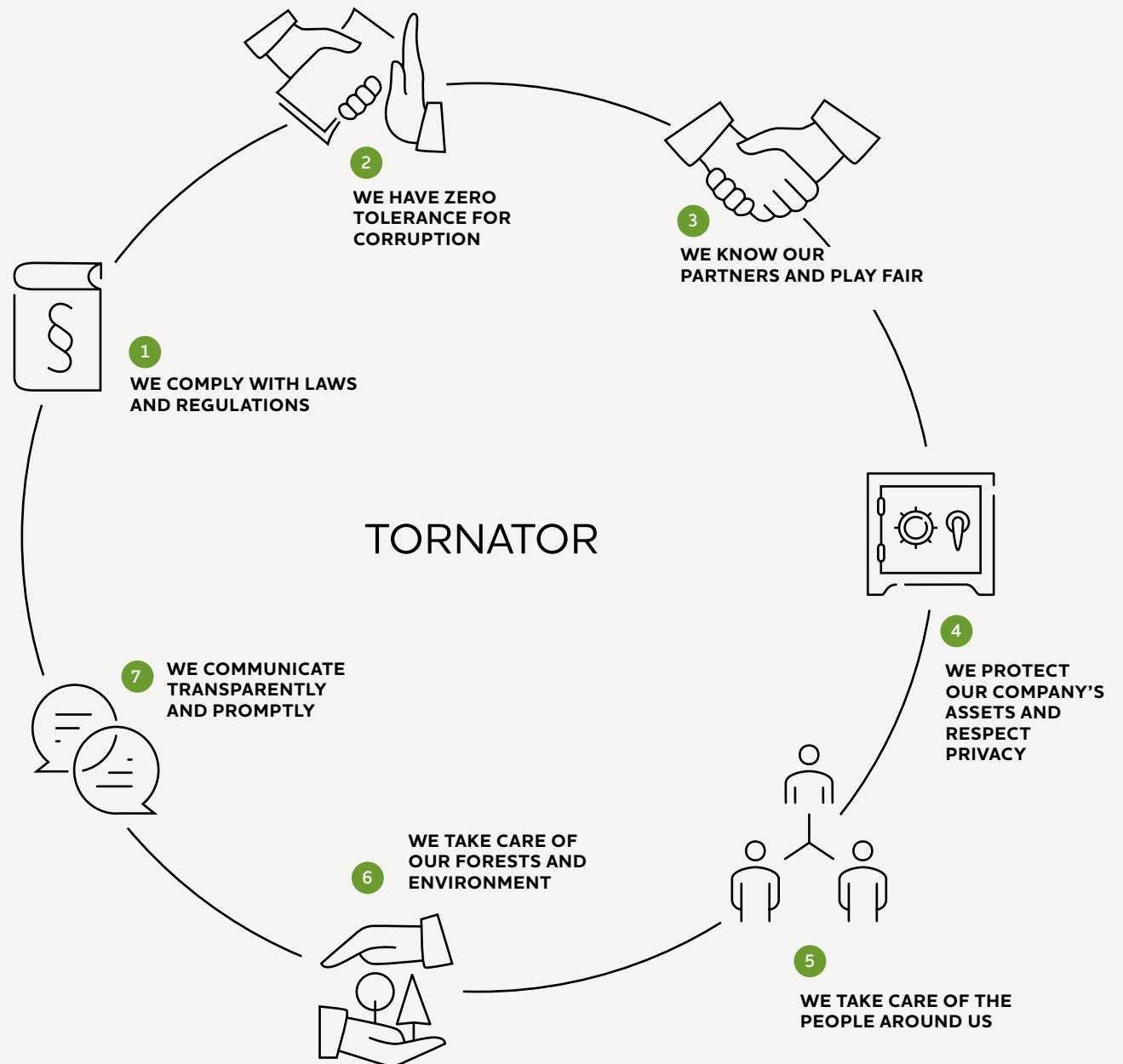


OUR COMMON RULES



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Test how well you know the principles of honest work and how you would handle any difficult situations you might face.



1 WE COMPLY WITH LAWS AND REGULATIONS

In all our operations, we comply with the laws, regulations and company's own instructions concerning us and our industry. Amongst the factors that are essential to Tornator's business operations are the laws on the status of workers, equality, privacy, forestry, financial management, occupational safety and environmental protection. We are also bound by forest certification requirements. We do not accept violations of the law, and we never encourage any violation of the law.

Each of us must be familiar with the laws, regulations and agreements concerning our own work. Supervisors provide the necessary induction and follow-up. In case of doubt, ask your supervisor or other person in charge for advice.



Tornator's standing instructions can be found on the [intranet](#).

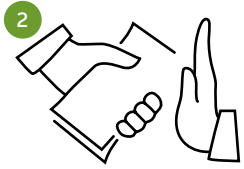
Finnish legislation: [Finlex](#)



A TRICKY SITUATION

QUESTION: *I work as a specialist at Tornator, and changes are going to be made to legislation that is relevant to my area of responsibility. How can the future changes be prepared for?*

ANSWER: As a specialist, it is important for you to monitor the legislative developments in your area of responsibility and to ensure for your own part that we comply in our operations with the regulations that are in force. We will receive up-to-date information on the amendments to the law from various bodies, for example, the Finnish Forest Industries, which usually also seeks to influence developments in the sector and give its views on the content of legislation during the drafting phase. In addition, we train our staff continuously. You can also contact process managers for more information about legislative changes.



WE HAVE ZERO TOLERANCE FOR CORRUPTION

We require our employees to act responsibly and to promote the company's interests. We do not accept corruption or bribery in any of our activities. Tornator and its employees never pay or offer bribes or illegal payments. An example of a bribe is an exceptionally large gift from a contractor just before a decision is made on a major tender in which the contractor in question is involved.

We do not accept the use for personal gain of information obtained from persons employed by the company. For example, recusals in purchase offers for real estate transactions always also apply to related parties if these are known.

The company's employees avoid activities that could lead to a conflict of interest. Examples of such activities are the provision and receipt of personal gifts and benefits beyond normal business and reasonable hospitality. Accepting money is always prohibited, but it is permissible to accept gifts of low monetary value (Please, check the country-specific value of the gift with your supervisor).

Any gift or hospitality that is given or accepted must be related to a legitimate business reason, and must always be of a reasonable nature and value. Gifts, hospitality and reimbursement of travel expenses must be subject to prior permission from a supervisor. Any request for or offer of inappropriate payments, benefits, gifts or hospitality must always be refused.

Our sponsorship and support activities

The principle of supporting and sponsoring the company is to support forest-related studies or hobby activities of children and young people locally. We do not participate in money collections by telephone. The company also does not participate in supporting political parties or religious movements or groups.

A TRICKY SITUATION

QUESTION: *A long-term contractor invited me to the anniversary celebration of their company, which includes a free stay at a hotel in addition to the celebration. Can I attend this event where our partner pays for everything?*

ANSWER: It is important to maintain good working relationships, so it is polite to participate in such an event. Before you participate, however, make sure that the company does not thereby become indebted to the offering party. Reasonable costs, such as those related to catering, can be accepted, but travel or overnight costs cannot. It is also important to discuss participation in advance with a supervisor.



WE KNOW OUR PARTNERS AND PLAY FAIR



Our approach requires cooperation and networking within the sector. By knowing our contractors and other partners and developing good contractual relationships with them, we can improve the performance of our business, our security of supply and the continuity of our operations. This also allows us to minimise the risk of being involved in illegal activities or business relationships that may entail losses or reputational harm. Tornator keeps its word in every situation.

We carefully select our partners according to qualitative criteria and require them to comply with the applicable legislation in their own operations. In addition, we require suppliers and partners to comply with Tornator's Code of Conduct. We want to identify and address the risks associated with partners even before the business relationship with them has been established. We aim to identify these risks in supplier assessments, where we focus on responsibility, quality and the willingness to develop. For us, it is important that contractors, for example, fulfil their own employer obligations and are able to respond to changes in the operating environment.

We monitor the activities of our partners throughout the contractual relationship. We do not accept bribery, corruption, money laundering, tax evasion or fraud. If you notice this kind of activity in your work, you must immediately inform your supervisor or report it through our notification channel.

We are committed to responsible procurement. The purchase of services, equipment or work is based on calls for tenders, and in these processes the services, equipment or work are always sought from several operators that submit tenders. We choose to be our partner the actors we consider to be responsible and reliable, with whom we strive to cooperate long-term. In procurement, attention must also be paid to energy consumption and environmental concerns.

A TRICKY SITUATION

QUESTION: *A relative of mine is a contractor in my operations area. Can I enter into a contract with them?*

ANSWER: Contracts and projects must be based on competitive tendering. You must disqualify yourself from the decision-making process, i.e. in this case from the selection of contractors and pricing. Assign the task to a colleague or supervisor. In this way, we can maintain fair play and avoid possible charges of nepotism in our procurement operations.

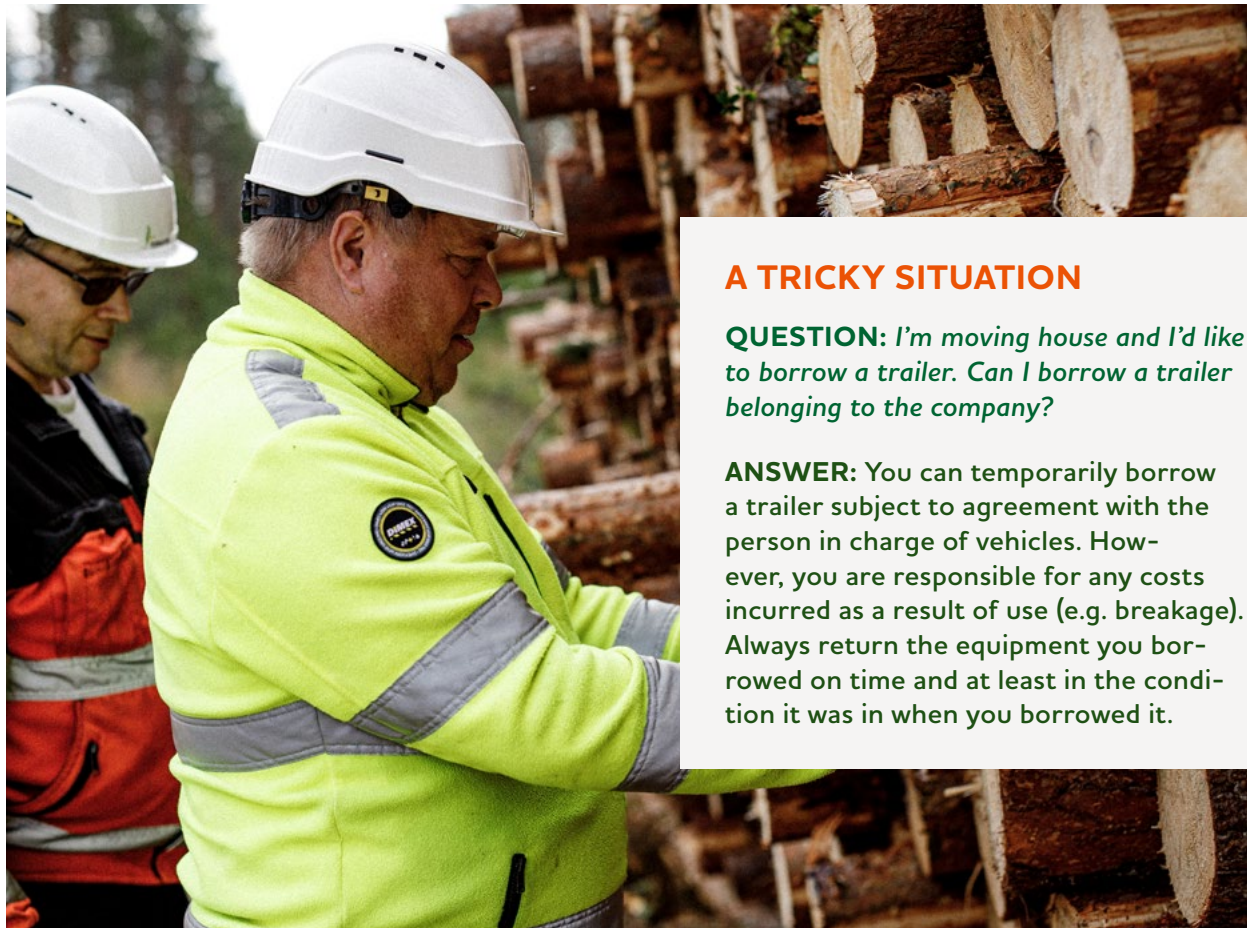
4 WE PROTECT OUR COMPANY'S ASSETS AND RESPECT PRIVACY

In our daily work, we are responsible for Tornator's assets and resources, such as machines, devices, vehicles, computers, mobile devices, financial assets, copyright and information. We should handle them carefully and protect them against damage, loss, theft and misuse. The use of Tornator's assets for unauthorised or illegal purposes is prohibited.

All employees must take appropriate measures to ensure the confidentiality of sensitive information relating to Tornator and its business and contracting partners. Please make sure that your password is only known to you, always use the proper devices to process classified information, and do not accidentally pass on any information you receive, for example, when printing materials for your work trip or place of remote work.

We handle sensitive information carefully and share it only with those who have access to it and who need it in their work. In accordance with our rules and procedures, we protect information from security threats and unauthorised and illegal use.

Do you have questions about privacy or security threats? For more information and instructions, contact the chief information officer.



A TRICKY SITUATION

QUESTION: *I'm moving house and I'd like to borrow a trailer. Can I borrow a trailer belonging to the company?*

ANSWER: You can temporarily borrow a trailer subject to agreement with the person in charge of vehicles. However, you are responsible for any costs incurred as a result of use (e.g. breakage). Always return the equipment you borrowed on time and at least in the condition it was in when you borrowed it.



A TRICKY SITUATION

QUESTION: *I have noticed that some colleagues leave contract papers with personal identity codes and the like on the table. What should I do?*

ANSWER: Please point out the matter to the colleague in question and advise them to store such papers in appropriate archiving facilities (locked up). This is in accordance with the Tornator approach to work. Also, suggest to your colleague that they read the company's privacy policy and to contact the head of data management if necessary.

All employees must take appropriate measures to ensure the confidentiality of sensitive information relating to Tornator and its business and contracting partners.



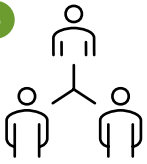
We respect the protection of privacy

We respect everyone's right to privacy. We process and collect personal data *in accordance with the applicable laws and the European Union's General Data Protection Regulation*. We also follow the company's own rules and procedures. Read more from the intranet: *security and data protection policy*. We use and use technology ethically and responsibly. Data protection is an integral part of all our operations.

Our principle is that personal data is protected with adequate security and is only used appropriately. Personal data must not be leaked to a third party, in which case there would be a risk of the use of the personal data in question without authorisation, and of unintentional or intentional publication of the data.

Practices that are in conflict with data security and data protection policy could at worst lead to the collapse of the entire business. Negligence may result in penalties and damages to the parties in question.

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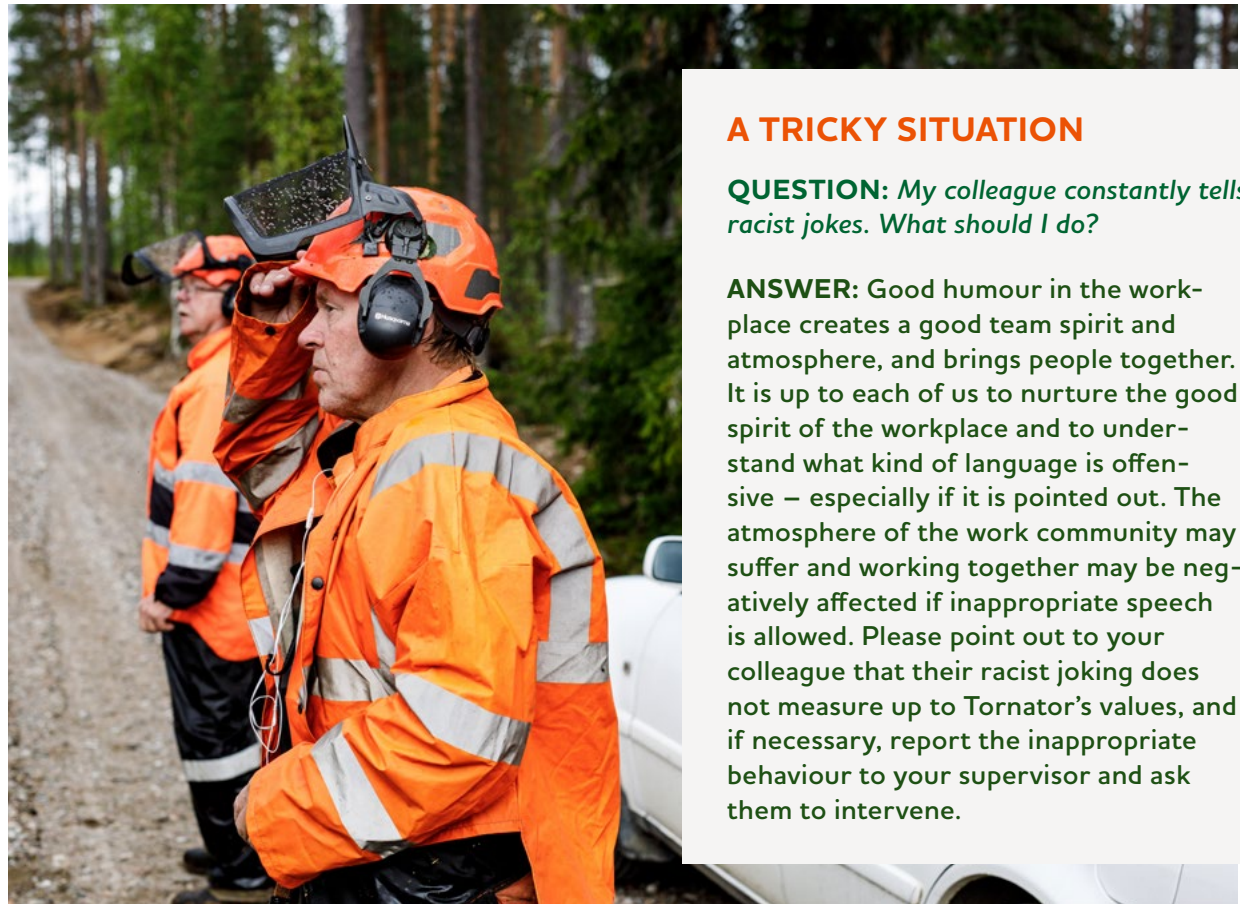


WE TAKE CARE OF THE PEOPLE AROUND US

We at Tornator have a fair way of working together. We get to do meaningful work every day and to do good all around us. We value our working atmosphere, which is relaxed and pleasant and where everyone's know-how is appreciated. This approach has been proven to lead to a good working environment and working relationships in the work community. We regularly monitor job satisfaction and well-being at work. We want to have enthusiastic and motivated personnel.

We are proud that Tornator keeps its word in every situation.

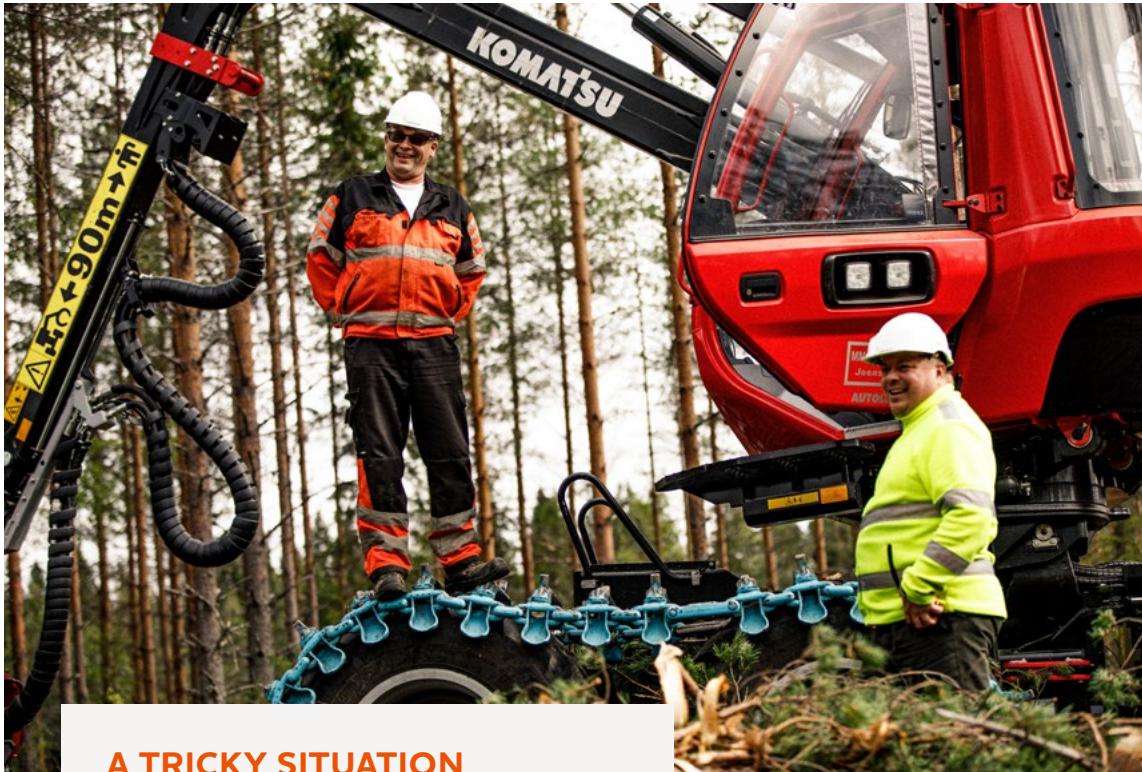
We are committed to respecting and promoting universal human rights in all our activities, including freedom of thought, opinion, expression, religion and peaceful assembly. We respect the principles of diversity, equality and equality – nobody is discriminated against on the grounds of gender, age, ethnicity, religion, disability or sexual orientation. Tornator operates in three different countries and we have people of many nationalities working for us. We want to make sure that everyone is heard, no matter where they come from or who they are. We believe that diversity creates the best opportunities for success.



A TRICKY SITUATION

QUESTION: *My colleague constantly tells racist jokes. What should I do?*

ANSWER: Good humour in the workplace creates a good team spirit and atmosphere, and brings people together. It is up to each of us to nurture the good spirit of the workplace and to understand what kind of language is offensive – especially if it is pointed out. The atmosphere of the work community may suffer and working together may be negatively affected if inappropriate speech is allowed. Please point out to your colleague that their racist joking does not measure up to Tornator's values, and if necessary, report the inappropriate behaviour to your supervisor and ask them to intervene.



A TRICKY SITUATION

QUESTION: *I have often noticed a hazard at the site that could result in a serious accident. What should I do?*

ANSWER: In order to avoid unnecessary personal injury, you must report your finding using the form on our website. Immediately report the problem to your supervisor, who will decide on the appropriate measures to take. Your vigilance could save someone's life!

We comply with national collective agreements and working time laws. We do not accept any form of psychological or physical punishment, violence, intimidation, bullying at work, sexual harassment or other forms of harassment, forced labour, child labour or other forms of involuntary work.

Occupational safety and well-being are an important part of Tornator's day-to-day operations. Our goal is zero accidents at the company's construction sites and for everyone to get home safely after their working day. Continuous risk assessments and

preventive measures contribute to the safety of employees.

Accidents are usually not anticipated, and can occur on forest sites, in the workplace or in traffic. No matter which site you work at, you should report an accident, near-miss or a work safety observation to your supervisor.

We are proud that Tornator keeps its word in every situation.



WE TAKE CARE OF OUR FORESTS AND ENVIRONMENT

We at Tornator have a strong and natural relationship with the forest – after all, it is a physical working environment for most of us. Because our relationship with forests is special and deep, their well-being is extremely important to us. We believe that responsible forest management and use of wood can ensure well-being not only for forests, but also for future generations.

Responsible use of forests involves paying careful attention to environmental aspects and valuing our environment. Among our range of means are nature management of economic forests, preservation of forest biodiversity, protection of waterways and safeguarding the conservation of species and nature sites.

We comply with forest and nature conservation laws and forest certification criteria. We aim to minimise the adverse effects of our business operations on climate, water, soil and species diversity. We regularly assess the quality of our business operations.

Each of us must take environmental considerations into account in our daily operations by paying attention to energy consumption, material efficiency and recycling. For example, it is important to consider how one could reduce the carbon footprint of travel.



A TRICKY SITUATION

QUESTION: *Our office does not have a recycling point for metal or glass. Can I ask that they be recycled at my place of work?*

ANSWER: Absolutely! All our daily activities are linked to environmental well-being, and it is also worth raising such concerns even with regard to relatively minor matters so that we can act more responsibly. Contact your supervisor and ask them to deal with the situation.



Can a task be handled remotely, or can public transport be used? We encourage our staff to share best practices related to these issues.

Any action that may cause harm to people or to nature should be carefully considered. For example, chemicals must always be stored and handled carefully and in accordance with national legislation.



Read more:

Tornator's environmental principles.



Responsible forest management and wood use can ensure the well-being of forests and future generations.

A TRICKY SITUATION

QUESTION: *Our forests comply with the PEFC and FSC standards. When it comes to felling, I feel that the amount of spared wood and rotten wood left in the forest is not sufficient. What should I do?*

ANSWER: This is a very important observation! We want to take care of responsibly managed forests with our certified operations. Contact a planning expert in the area in question without delay to find out how we can deal with and correct a potential quality deviation.



WE COMMUNICATE TRANSPARENTLY AND PROMPTLY

Our good reputation is our trump card. The company's reputation has a major impact on Tornator's business operations. Each Tornator employee acts as a representative of and ambassador for the company in its operations.

We strive for active, clear and timely communication and collaboration with our stakeholders. We communicate our activities and events openly and honestly. Our goal is to increase the knowledge and understanding of sustainable forestry and responsible renewable use of our natural resources.

We produce and issue press releases and publish topical information on our operations on the company's website. The company also publishes a comprehensive annual report every year, which details the events of the year in review. The information published in our annual reports is also a good guide to what every Tornator employee can publicly discuss.

Each Tornator employee acts as a representative of and ambassador for the company in its operations.

Our shared principle is that information and commentary are provided by the person who knows the most about the matter and whose area of responsibility is the subject of the issue in question. With regard to crisis management, Tornator has a designated crisis team that decides on the necessary measures and communications. Read more from the intranet: [Tornator crisis communication guide](#). For communications-related issues and problems, contact the corporate responsibility manager.

The purpose of communications is to create and support a framework for responsible management of timely communication and to support the work community in realising its strategy and goals.

A TRICKY SITUATION

QUESTION: *I would like to post a photo of a Tornator regeneration area on social media. Is this allowed?*

ANSWER: It is a good thing to tell others about Tornator's activities! However, show appreciation towards your employer and colleagues in all situations. In other words, only share pictures and text that do not harm the company, but instead promote a positive and practical view of sustainable forestry. If there are people in the picture, always ask them first for permission before posting an image on social media.

DON'T BE LEFT WORRYING



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of our Code of Conduct at
<https://lms.tornator.fi/en>

*Test how well you know the
principles of honest work and how
you would handle any difficult
situations you might face.*



SHARE YOUR CONCERNS

We want to maintain a climate of transparency and high ethics in our company's operations. Our employees are our most important source of information for detecting potential abuses. It is important that everyone feels able to report without delay any suspected abuse, i.e. any action that is not in line with Tornator's principles of good business practices. In this way, we can prevent or rectify any abuses that occur.

First and foremost, we encourage you to contact a supervisor in the organisation and to share your concerns or observations with them. You can also talk openly about your observations with colleagues and reach an agreement together on the best way of dealing with the matter.

However, if you feel you cannot share your information openly, you can report your concerns anonymously through the notification channel. Our anonymous reporting channel is an early warning system aimed at reducing risks. It is an important tool for

maintaining a high standard of business ethics, but also to maintain the trust of customers and the general public. Whistleblowing notifications can be made openly or anonymously. The notifier will not suffer any negative consequences as a result of the notification.

All reported cases of abuse will be investigated confidentially and impartially in accordance with a specified procedure. To ensure anonymity, the notification channel is managed by an external partner, WhistleB.



Whistleblowing reports can be made here:

<https://report.whistleb.com/en/Tornator>

You can report your concerns openly or anonymously. The notifier will not suffer any negative consequences as a result of the notification.



Tornator Oyj
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FI-55100 Imatra, Finland

www.tornator.fi/en



**RESPONSIBLE EXPERTISE
IN FORESTRY**