

CODE OF CONDUCT

– Barona's ethical guidelines



barona

| | |
|--|----------|
| INTRODUCTION | 3 |
| 1 BARONA'S CORE VALUES AND RESPONSIBILITY PRINCIPLES | 4 |
| 2 PURPOSE AND APPLICATION OF THE CODE OF CONDUCT | 5 |
| 3 WE COMPLY WITH LAWS AND REGULATIONS | 5 |
| 4 WE CREATE INCLUSIVE, EQUAL AND SAFE WORKING LIFE | 6 |
| 4.1. Learning and competence development | 6 |
| 4.2. Pay and remuneration | 6 |
| 4.3. We ensure occupational well-being and safety | 7 |
| 4.4. We provide appropriate orientation training | 7 |
| 4.5. Aiming for diversity and non-discrimination in working life | 7 |
| 4.6. We address discrimination, harassment and inappropriate conduct without delay | 7 |
| 4.7. We respect the freedom of association | 7 |
| 5 WE RESPECT HUMAN RIGHTS | 8 |
| 5.1. We do not condone forced labour or child labour | 8 |
| 6 WE ARE COMMITTED TO ENVIRONMENTAL RESPONSIBILITY | 8 |
| 7 WE OPERATE ETHICALLY AND DO NOT CONDONE CORRUPTION OR BRIBERY | 9 |
| 7.1. We require fair competition | 9 |
| 8 WE ARE RELIABLE WITH REGARD TO DATA PROTECTION | 9 |



INTRODUCTION

Responsibility in business is no longer a choice, but an essential condition for every company. Stakeholder trust is crucial and, at Barona, we want to be deserving of the trust of our clients, partners and employees.

Barona operates ethically and responsibly. We are committed to our core values: courage, freedom, responsibility and working together. Our day-to-day operations are guided by our Code of Conduct, which is based on our core values and described in this document.

Barona wants to be a pioneering company, also with regard to responsibility. Our clients are constantly raising the bar, and we also demand more from ourselves every year. It is important to us that no unethical activities are carried out by us or our network. If any problems emerge, we address them immediately.

In addition to promoting adherence to this Code of Conduct, we encourage everyone at Barona to use independent thinking and discretion. At Barona, we foster a culture in which everyone can express their opinions and be heard.

When it comes to responsibility, actions speak louder than words. Together, we are responsible for life at work – every day. Every encounter is an opportunity to fulfil expectations and promises. When we do the right thing, we also respect everyone's rights and make working life better.

Respectfully yours,
Lassi Määttä,
Chief Executive Officer, Barona

1 BARONA'S CORE VALUES AND RESPONSIBILITY PRINCIPLES

Responsibility is one of Barona's core values. We act responsibly, comply with this Code of Conduct and do not tolerate deviations from it.

We are committed to economic, social and environmental responsibility. This includes, for example, appropriate risk management and ensuring profitability, taking into account the principles of sustainable development, and the continuous development of measures related to training and employment.

Barona's company culture is based on trust, openness and mutual respect. We promote equality, diversity and inclusion in everything we do.

OUR CORE VALUES ARE:

RESPONSIBILITY

Together, we promote equal and ethical working life. We encourage transparent conduct that supports diversity and respects differences. We believe that everyone deserves to find their place in working life. We are not afraid to address difficult issues when necessary, and we are committed to developing our operations. We encourage everyone to engage in responsible actions and to make an extra effort to help others. Barona employees are known for being prepared to take on responsibility in working life.

COURAGE

We encourage our employees to roll up their sleeves and take an experimental approach to work, without fear of mistakes. We want to be leaders rather than followers. We set ambitious goals that help us increase happiness and fairness in working life. We value people who take on responsibility and have the initiative and creativity to put their strengths into action to develop something new.

FREEDOM

We give people the freedom to be exactly who they are and to work in their preferred way while observing the principles we have established together. With us, you do not need to hide the rest of your life, not your religion, not your hobbies or who you love. We believe in people and a working life that suits them.

WORKING TOGETHER

We create a better working life by working together. We share our knowledge and expertise with colleagues, employees and clients. We respect each other's opinions and strive to find solutions together. We make the results of our shared efforts visible, and we celebrate our successes together.

Starting from 2022, we will prepare a separate responsibility report as part of Barona's financial statements and annual report.

2 PURPOSE AND APPLICATION OF THE CODE OF CONDUCT

Our Code of Conduct guides the actions of everyone at Barona. This includes those who work at the Barona office and those who work for our clients. We have the same expectations for our partners and subcontractors as we have for ourselves.

We require everyone in our organisation – and our partners – to consider the economic, social and ecological impacts of business activities in accordance with ethical principles.

We are committed to open, honest and timely communication. We conduct our activities across various communication channels and social media according to the same internal policies and confidentiality principles as we apply in our other communications.

3 WE COMPLY WITH LAWS AND REGULATIONS

In our operations, we comply with all applicable national and international laws and regulations, the operating principles documented in this Code of Conduct, and the best practices of our industry.

We do not engage in, or condone, violations of the law. We do not, under any circumstances, advise anyone to violate currently valid legislation.

We also always require our employees, clients, partners and subcontractors to operate in compliance with laws and regulations.

We actively monitor legislative changes in our industries and operating countries.

We are committed to [the UN Global Compact Initiative](#), the world's largest corporate sustainability and corporate social responsibility initiative. In addition, we are committed to follow the UN's [ILO Declaration on Fundamental Principles and Rights at Work](#) and to respect human rights as defined in the [Universal Declaration of Human Rights](#). We also observe the principles of the [WEC \(World Employment Confederation\) Code of Conduct](#) in our operations.



4 WE CREATE INCLUSIVE, EQUAL AND SAFE WORKING LIFE

People are at the core of our business. Everyone is treated equally in our organisation. Everyone has the right to raise issues with their colleagues and the right to be heard. We adhere to our values and jointly agreed management principles in all of our processes. Leadership comes down to will, skill and consistency. Barona's approach to leadership and management is based on active interaction, coaching to help people achieve set targets, and working together with courage. Leadership and supervisory work at Barona are based on our core values. Our operating culture encourages our supervisors to lead their teams in a manner that promotes cohesion and team spirit.

4.1. LEARNING AND COMPETENCE DEVELOPMENT

We champion active learning. We encourage people to take on new tasks and, in our community, we value learning from each other and actively sharing acquired knowledge.

4.2. PAY AND REMUNERATION

Our systematic processes ensure that wages are paid on time, in accordance with laws and regulations, and that pay is always in line with the applicable collective agreement at a minimum. For those of our employees who work for our clients, the client organisation's local agreements can also be applied, provided that they do not put the employee in a worse position relative to the applicable collective agreement.

The remuneration of those of our employees who work for our clients is based on the applicable collective agreement or contractual pay. Employees may also be entitled to other forms of compensation and benefits according to the client company's policies and practices.

4.3. WE ENSURE OCCUPATIONAL WELL-BEING AND SAFETY

We are committed to actively ensuring occupational well-being and safety throughout Barona Group. We promote the physical and mental health and safety of all our employees.

Our goal is for everyone at Barona to be aware of their responsibility to maintain a safe and healthy working environment. We require our employees to report any deficiencies, hazards or incorrect procedures to their supervisor or equivalent.

Accidents and near misses related to occupational safety and health are documented and investigated.

We are also responsible for engaging the commitment of our client companies to a high standard of managing safety and the ability to work when work is performed at client locations and under the client's supervisors. We require our clients and partners to assess safety and health risks on a regular basis.

4.4. WE PROVIDE APPROPRIATE ORIENTATION AND INDUCTION

Orientation and induction are key elements of well-being and safety at work. We ensure that all of our employees are provided with the necessary training for their work.

4.5. AIMING FOR DIVERSITY AND NON-DISCRIMINATION IN WORKING LIFE

We aim to provide our employees and trainees with a safe and open community that views diversity as an asset.

For job applicants, we aim to offer an equal and non-discriminatory applicant experience in

which technology and data is used responsibly and in accordance with ethical principles.

We expect our clients and partners to promote the same principles in their operations.

4.6. WE ADDRESS DISCRIMINATION, HARASSMENT AND INAPPROPRIATE CONDUCT WITHOUT DELAY

We treat all people equally regardless of their ethnic background, age, gender, nationality, religion or sexual orientation.

We encourage fair, open and respectful interactions in our work community and throughout Barona Group.

We are committed to complying with the legislation concerning equality and non-discrimination, as well as the diversity, equality and non-discrimination plans that guide our operations.

We have zero tolerance for harassment, discrimination and other inappropriate conduct. Any inappropriate conduct must be reported to a supervisor or equivalent without delay, who will then process the report immediately in accordance with our guidelines. Barona has a separate [whistleblower reporting channel](#) for suspected misconduct.

4.7. WE RESPECT THE FREEDOM OF ASSOCIATION

Barona is committed to respecting employees' freedom of association and membership in trade unions and the right to collective bargaining. We do not engage in discriminatory practices based on these factors. The minimum terms of employment set out in legislation and collective agreements are observed throughout the supply chain.



5 WE RESPECT HUMAN RIGHTS

BBarona respects the value, privacy and freedom of religion and conscience of each individual and does not condone any discrimination, harassment, intimidation or insults of any kind in its own operations or its supply chain. Our commitments to international regulations are described under the “We comply with laws and regulations” section.

We treat all employees, applicants, trainees, clients and partners equally and without discrimination. We address any problems or deficiencies without delay and take the necessary action to rectify the situation.

Our clients and partners must, upon request, be able to verify their practices for monitoring human rights in their operations and supply chain. Any human rights violations must be addressed by taking immediate corrective action.

5.1. WE DO NOT CONDONE FORCED LABOUR OR CHILD LABOUR

In accordance with the [ILO principles](#), we do not use, or participate in using, forced labour in our own operations or in our supply chains, and we do not hire individuals who are below legal working age. We comply with legislation and rules concerning the employment of young people, and individuals under 18 years of age are not hired for work that endangers their physical or mental development. In business sectors in which we employ individuals under the age of 18, we pay special attention to matters concerning their duties and working hours, for example.

6 WE ARE COMMITTED TO ENVIRONMENTAL RESPONSIBILITY

At Barona, we are committed to monitoring, anticipating and reducing the environmental impacts of our operations in a suitable manner in each business sector.

7 WE OPERATE ETHICALLY AND DO NOT CONDONE CORRUPTION OR BRIBERY

Integrity is a matter of honour for us. We do not engage in bribery or extortion in any form: this also applies to offering, promising, making or receiving inappropriate payments of any kind in order to gain a business advantage or other inappropriate benefits.

Offering or making illegal payments to any party is prohibited under all circumstances.

If gifts or other hospitality are offered or received, they must be appropriate and permitted under local legislation and business practices.

7.1 WE REQUIRE FAIR COMPETITION

We always operate in accordance with the applicable competition laws and other relevant regulations. We compete on open and fair principles.

We do not condone any anti-competitive practices, including pricing agreements, cartels or the abuse of market position.

Our procurement principles and guidelines are based on good corporate governance and general anti-bribery principles. We treat all suppliers equally during competitive tendering processes and cooperation. We do not engage in supplier cooperation that could compromise our neutrality towards suppliers or their representatives. In tendering processes, supplier selection is based on the criteria communicated in advance to the participants.

If we find that a partner has violated our Code of Conduct, we will take the necessary action without delay.

8 WE ARE RELIABLE WITH REGARD TO DATA PROTECTION

At Barona, we process personal data responsibly, carefully and systematically. Our communications concerning the processing of personal data and customer rights are open and clear. We comply with the obligations set out in the EU's General Data Protection Regulation (2016/679).

We respect privacy and maintain a high standard of data security. We comply with data protection laws and good personal data processing practices in everything we do.

We require the same from all stakeholders that process personal data on our behalf.

We process personal data only for pre-determined legal purposes. We only collect the data necessary for the purpose, update the personal data regularly, and erase or minimise the personal data that we no longer need.

Up-to-date information on data protection is always available to the data subjects, and we ensure that the rights of data subjects are realised in accordance with the applicable legislation.

[Link to Barona's Privacy Policy >>](#)

barana

IS THE SOLUTION