



Pihlajalinna

Anti-Corruption and
Anti-Bribery Policy

1. PURPOSE AND SCOPE OF APPLICATION

Pihlajalinna's Code of Conduct describes the way we operate in compliance with rules and our values. The purpose of this Anti-Corruption and Anti-Bribery Policy (hereinafter referred to as the "Policy") is to specify Pihlajalinna's ethical operating principles and other policies in effect in the Group, particularly with regard to corruption and bribery. We do not, under any circumstances, offer, give, solicit or accept bribes or other illegal or unethical benefits.

This Policy applies to all employees and partners of Pihlajalinna Plc and its Group companies, as well as the members of Pihlajalinna Plc's Board of Directors. Pihlajalinna requires its employees and partners to act with integrity and transparency in their work.

2. CORE PRINCIPLES

Pihlajalinna has zero tolerance for corruption and bribery, including other unreasonable payments and benefits given in business activities. Pihlajalinna's success is based on operating in a legally compliant and fair manner. We never try to promote our business or influence decisions concern-

ing our business through criminal or otherwise inappropriate means, such as giving, offering, promising or accepting bribes or other unlawful benefits. We never abuse our position for private gain. Giving a bribe includes all acts that encourage inappropriate conduct or are aimed at benefiting from a person's position.

In addition to a monetary bribe, gifts, hospitality, credit, discounts, travel, personal benefits, accommodation and services can also be considered unjustified or inappropriate benefits. Offering, authorising, requesting and approving payments or advantages of these types is prohibited at Pihlajalinna.

When interacting with stakeholders, we ensure that the gifts, hospitality and cost compensation we offer and accept are reasonable in terms of value and do not give the impression of inappropriate influence. It is prohibited to offer any stakeholder anything that could influence their actions. We always comply with Pihlajalinna's rules and guidelines concerning gifts, hospitality and cost compensation, and we respect our cooperation partners' policies concerning the receiving of gifts.

Transactions through third parties must be avoided. If third parties are used, their services must be transparent and reasonably priced,

and they must not include bribes or payments intended to facilitate services other than those for which the third parties are hired.

Employees participating in procurement activities are prohibited from participating in customer events organised by bidders during the procurement process. Deviations from this rule are only allowed in exceptional circumstances, and such deviations must be authorised by the supervisor of the employee in question.

3. DEFINITIONS

Corruption is the abuse of entrusted power for private gain. It can take many forms, from the minor use of influence to institutional bribery.

Bribery is a form of corruption that refers to money, gifts or other incentives given or received in business or official activities that can be considered to influence, or have the purpose of influencing, the decision-making or actions of the recipient of the bribe in a manner that favours the party giving the bribe or another party.

In general, bribery includes offering and receiving bribes, payments, facilitation payments, gifts and hospitality of any kind for the aforementioned purpose.

A gift refers to any tangible or intangible ben-

efit that is provided without charge or at a value that clearly deviates from its fair value and has direct or indirect financial or emotional value for its recipient. A gift may be, for example, a company's promotional product or corporate gift (calendars, pens), a bottle of wine, a food hamper or an event ticket where the party giving the ticket is not the host of the event, and giving the ticket is not a matter of establishing a business relationship (e.g. a situation where tickets to an event are donated without the establishment of a business partnership and the party giving the tickets will not participate in the event).

Hospitality is broadly defined and always includes the presence of a third party (hosting or being hosted) and the purpose of establishing a business relationship. Hospitality can include, for example, shared meals, tickets to a sporting or music event, beverages, accommodation or similar.

An employee is any person in an employment or service relationship with Pihlajalinna and/or subject to Pihlajalinna's supervision and guidance, regardless of the person's position, duties, length of employment or other relationship with Pihlajalinna.

A third party refers to a person or organisation with whom an employee interacts, such as

current and potential customers, suppliers, business contacts, representatives and consultants. Third parties also include central government bodies and other public administration bodies, their advisers and representatives, as well as public officials, politicians and political parties. An employee's family member or acquaintance can also be considered a third party

4. GIFTS AND HOSPITALITY

Pihlajalinna's employees and management are prohibited from accepting or offering gifts, hospitality or cost compensation of any kind unless there is a legitimate business reason for doing so, and if they can be considered to influence the outcome of a business transaction or can otherwise be considered to influence the independence of the recipient. However, we may give and receive ordinary gifts of minor value (such as pens, notebooks and similar promotional products of an organisation) and reasonable hospitality related to normal business activities. Reasonable hospitality that is part of normal business activities is generally permitted when there is a legitimate business reason for it and it is transparent, reasonable in relation to the recipient's position and the circumstances, and given in good

faith within the limits permitted by law. Gifts, hospitality and cost compensation are always given openly, and cash or gifts comparable to cash are never allowed.

Hospitality and reasonable gifts are common in business, but it is important to keep in mind that there is a fine line between a gift and a bribe. Sometimes even an ordinary gift can seem like a bribe if there is any ambiguity about the reasons for giving and receiving it. Acceptable hospitality, gifts and cost compensation are occasional and come with no explicit or concealed obligations for the giver or recipient, nor expectations of reciprocal favours.

The general rule is that Pihlajalinna employees can accept gifts that have a value of less than EUR 100 and a legitimate business reason (e.g. customer or supplier relationship).

With regard to bribery, Pihlajalinna does not distinguish between public officials and office holders working or performing duties in the public sector and private sector employees. However, it is important to note that public sector entities and individuals are often subject to rules and restrictions that do not apply to the private sector. All relationships with the public authorities and public officials must comply with the applicable laws and regulations, and all benefits offered

must be fully transparent, appropriately documented and recorded in the accounts.

5. TRAVEL

Pihlajalinna does not pay third parties' travel expenses, accommodation expenses or other personal expenses. However, Pihlajalinna pays the corresponding expenses of its own employees.

6. SPONSORSHIPS AND DONATIONS

Pihlajalinna has commercial sponsorship agreements with sports teams and individual athletes, for example. Decisions concerning sponsorship agreements must be made in accordance with the guidelines issued by Pihlajalinna's marketing function.

It is prohibited to make donations to customers, potential customers, subcontractors or public officials if the donation includes an expectation of reciprocity between the recipient and Pihlajalinna. Donations to charitable organisations can also be considered bribes if they promote business interests.

Pihlajalinna's Board of Directors makes all decisions on significant donations and actions comparable to donations. The CEO may decide on minor donations with the authorisation of the

Board of Directors.

However, business units can make minor charitable donations (e.g. donations to the Hope campaign during the Christmas season).

7. IMPLEMENTATION OF THIS POLICY

The Board of Directors of Pihlajalinna Plc holds ultimate oversight responsibility for this Policy. The Board of Directors approves the Policy on the basis of the CEO's proposal. The primary responsibility for the implementation of this Policy lies with the management team in charge of each business area and the persons in charge of Group functions. In addition, supervisors are responsible for setting an example and providing guidance in the prevention of corruption and bribery.

Employees are required to be familiar with Pihlajalinna's Code of Conduct and the contents of this Policy.

8. INVESTIGATION OF SUSPECTED VIOLATIONS

All Pihlajalinna employees and stakeholders who become aware of any actions that may constitute violations of this Policy have an obligation to report them to either their supervisor or Pihlajalinna's Chief Legal Officer. Violations of the policy

can be reported anonymously via Pihlajalinna's whistleblowing channel. Persons who, in good faith, report potential misconduct or provide information or otherwise assist in the investigation of potential misconduct are protected from retaliation.

All potential indications of corruption and bribery (reported anonymously or otherwise) are investigated, and violations of this Policy are subject to appropriate corrective measures. Persons who violate this Policy may also be subject to disciplinary measures that may lead to their dismissal, for example. Depending on the jurisdiction in which the violations occur, they may also lead to criminal investigation and prosecution.

If it is observed that a supplier or other stakeholder does not comply with this Policy or has violated this Policy, Pihlajalinna has the right to take corrective measures concerning the business relationship between Pihlajalinna and the supplier or other stakeholder. If the violation of the Policy is serious, Pihlajalinna has the right to terminate the business relationship with the supplier or other stakeholder with immediate effect on the basis of breach of contract.

Pihlajalinna Plc's Board of Directors has approved this Anti-Corruption and Anti-Bribery Policy at its meeting on 13 December 2024.