

Hartela's Code of Conduct

CODE OF CONDUCT



Working together for a sustainable future

Hartela's way of working has been based on our values for decades: proximity to customers, initiative and professional pride. As a domestic family company, we want to make sure that we operate ethically sustainably, and we build a common future with respect for people and the environment.

In our community, we want to foster a good culture that is based on shared values. Everyone can be themselves and achieve their best in an encouraging atmosphere. These values have remained, even though we have grown from a Turku-based family-owned business into one of the most significant construction companies in Finland.

Hartela's Code of Conduct brings together our common operating methods into binding guidelines and principles. These guidelines and principles are binding on all Hartela employees and partners in a contractual relationship with Hartela and their employees when working with Hartela.

We all play an important role in building an ethical and responsible work community and an interactive organisational culture. You play an important role in our success and in the implementation of our values in everyday life. We are each responsible for our own part for complying with these operating methods in all of our daily choices. Please read this Code of Conduct carefully.

In addition to our Code of Conduct, we always follow the applicable laws and regulations in all our activities. Country-specific or local practices must never take precedence over legal requirements.





We take care of occupational safety and well-being at work

All Hartela employees and everyone working at our sites and offices has the right to go home healthy after a day at work. We follow the occupational safety instructions and always use the necessary protective equipment. We are careful and anticipate safety risks.

We ensure that our employees have access to the appropriate tools, the necessary training and sufficient occupational safety information in all situations. We address any shortcomings and take corrective action if we discover any safety hazards.

We pay comprehensive attention to health and well-being and ensure that the mental and physical workload of tasks remains reasonable. We offer flexibility for work-life balance.

Taking care of occupational safety and well-being is everyone's responsibility, and everyone has a duty to participate in improving them.

We treat everyone equally and with respect

All of our own employees and the employees of our partners are valuable to us, and we want to promote equality consciously and actively in all areas of our operations. We treat everyone equally and offer everyone equal employment opportunities, and we do not tolerate any kind of harassment or discrimination. We do not discriminate against anyone based on appearance, ethnicity, descent, religion or belief, gender, sexual orientation, age, disability, marital status or family background.

We have a zero-tolerance policy towards all forms of discrimination and inappropriate treatment. This means treating each other, our subcontractors, our stakeholders and our other partners with respect. We respect the physical and psychological integrity of others and do not make offensive comments, even in the form of jokes. Intervention in inappropriate behaviour and bullying is the responsibility of the entire working community.

When recruiting new people, we value professional skills in all their forms. We also aim to take diversity into account in recruitment.



Our operations are transparent and open

We act honestly and responsibly so that our choices can withstand open scrutiny. When representing Hartela, it is our duty to make decisions in Hartela's best interests so that the pursuit of our own personal interests does not affect the matter. If we are faced with a decision that affects us or those close to us personally, we recuse ourselves from the decision-making. In work-related conflicts of interest, the same requirements apply to everyone.

We do not accept bribery in any form. Bribery is the offering or receipt of any gift, reward or benefit with the intent to cause a dishonest or unlawful act or breach of trust in the company's business.

Small grassroots-level influence attempts are just as important to consider as large monetary conflicts of interest. We only offer or receive gifts and hospitality that, if made public, would not cause general disapproval. The value of an acceptable gift or hospitality is EUR 100. In the case of a more valuable gift or hospitality, always consult your supervisor or at least the head of your unit before accepting it.





We build good interaction and cooperation

Through our operations, we strengthen cooperation and seek joint solutions. When we make decisions, we try to listen to those who are affected by them, where possible. We do not tolerate unfair or unequal treatment.

We ensure that the information that is essential for the work is passed on to all affected parties and ensure that everyone is provided with effective access to the necessary information.

We share our know-how within Hartela. We want to preserve, share and strengthen our in-house expertise and skills. We value open communication, information sharing, helping others and open listening.

In all our activities, we strive to strengthen the cooperation between construction sites and offices.



We are trustworthy

We build trust and keep our promises. If something does not work, we say so openly. We are responsible for ourselves and the people around us, we help each other and we create value for our customers through our operations.

We do not give a bad image of Hartela with our behaviour, and we also take this into account on social media.

We are also trustworthy in the processing of personal data and respect privacy when processing personal data. Personal data is always processed with care, caution and in accordance with the rules. We maintain our personnel's data security and privacy expertise through training.



We value good partnerships

In customer and cooperation relationships, we adhere to equal treatment. We cherish long and tried and tested cooperative relations, but we make our decisions on the basis of needs, in accordance with good practice and transparently.

We choose our subcontractors, partners and other stakeholders carefully, requiring them to commit to our Code of Conduct. In the selection of partners, we value good previous experiences and look for partners that are reliable and have the same ethical values as we do.

While a competitive situation is in progress, we do not offer gifts or hospitality to avoid risks or accusations of influence attempts. During negotiations, we do not offer or receive anything that might appear suspicious. We compete fairly, as we would like others to compete against us.

We take responsibility for the environment

We are committed to sustainable construction. We identify and take into account the lifecycle environmental impacts of construction and set clear objectives and guidelines for our operations. We are developing towards carbon-neutral and energy-efficient construction, and we bear our responsibility for climate change mitigation and biodiversity. We provide our customers with solutions that enable them to reduce their own environmental impact.

Sustainability is always an important factor in our decision-making. When we make decisions between productivity and sustainability, we innovatively seek solutions that support both. We want to make sustainability a concrete part of our work. We pay special attention to proactive operations, the material efficiency of construction and the selection of materials. At our construction sites and offices, we strive to minimise waste, promote the circular economy and ensure the cleanliness of the environment.

We train our personnel to operate in an environmentally sustainable manner.



We make purchases sustainably and thoughtfully

We want to save the environment, customer costs and our working time. Our operations are based on good advance planning, both at the offices and the construction sites. We purchase materials at the right time and in the necessary quantities, so that we do not have to wait for them or, alternatively, move around raw materials that arrived too early at the site.

We avoid surpluses and ensure that excess material is handled appropriately and in an environmentally and economically sustainable manner. We are aware that even surplus material is the company's property that cannot be taken for personal use or otherwise utilised outside of Hartela's value chain free of charge.



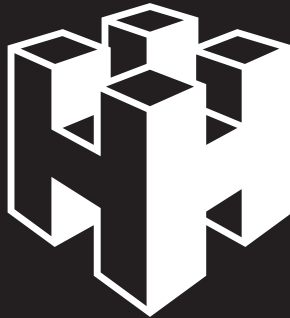
Compliance with the Code of Conduct and reporting of misconduct

In all our activities, we follow this Code of Conduct and the applicable laws and regulations. Non-compliance with laws and regulations, as well as violations of this Code of Conduct, can have serious consequences for the individual or the company.

If you suspect or notice that the Code of Conduct, laws or other regulations have not been followed in a situation, always discuss the matter primarily with your supervisor. You can also report your concern to Hartela's HR Director, General Counsel or a member of Hartela's management.

You can also send your report confidentially and anonymously on Hartela's Whistleblowing channel.

A person who reports a violation in good faith will not suffer any adverse consequences.



HARTELA

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