



Fazer Group's Code of Conduct

**Northern Magic.
Made Real.**



Fazer Group's Code of Conduct

“Our Code of Conduct defines our company. It is the very cornerstone of everything we do and how we face our customers, business partners and our colleagues.

Fazer's ethical culture is developed and created jointly by all our employees across the markets we operate in. This applies also to the Board of Directors. Choices that we make in our everyday life ultimately define Fazer and what Fazer stands for.

Since our founding, we have been striving for excellence and it requires us to be a trusted partner towards our customers and other business partners. We are committed to creating value for all our stakeholders based on our values of *Northern Liberty, True Relationships and Fearless Creativity*.

That is the reason we expect all of us to live by the principles stated in our Code of Conduct and why we should uphold the highest level of ethical behaviour in all our doings.

The Code of Conduct does not cover every situation that may occur, and it does not remove the need for using common sense and professional judgment but as Fazer's ambassadors, each of us has a responsibility to know and live the Code of Conduct and to use good judgment and act ethically in every action we take.

The Code of Conduct is not a substitute for, nor should it be considered to override, local laws and regulations. It represents supplementary ethical standards and principles of behaviour for all Fazer Group employees.”

Christoph Vitzthum
President & CEO
Fazer Group





1. Laws and policies

We must comply with all applicable laws, regulations and Fazer Group's policies.

Since we operate in multiple countries, make sure you know the laws and regulations related to your job in the country (or countries) where you do business.

We all have a duty to read and understand our Group's policies and procedures in our area of work.

2. Respect for human rights

We do business with respect for human rights in accordance with the UN Guiding Principles on Businesses and Human Rights (UNGPs) and ILO conventions.

We do not accept the abuse of child labour, forced or compulsory labour, or other human right abuses.

3. Respectful and harassment free environment

We treat people with equal respect and dignity based on the principle of non-discrimination. Every employee is to treat their colleagues with respect and fairness.

We have no tolerance for physical, verbal, sexual or psychological harassment, bullying or abuse.

We promote the diversity of our workforce and all decisions regarding an individual employee shall be based on merit regardless of race, ethnicity, national origin, religion or belief, gender, gender identity, sexual orientation, age, disability, marital or family status, or any other characteristic.

In addition, we recognize and respect our employees' right to freedom of association and collective bargaining.





4. Health and safety

People are at the heart of Fazer. This means that we always put health and safety first.

We are committed to providing a safe and healthy working environment for all employees, business partners and suppliers and to continuous improvement on health and safety matters.

Every employee must know and follow all health and safety rules, policies and procedures in their area of work.

5. Anti-bribery and corruption

We are committed to prevent the occurrence of bribery in all of its forms. It is forbidden to give or receive anything of value to improperly influence another in order to obtain business or other advantage. We do not give or promise to give money or anything of value to government officials in order to obtain or retain business, or to secure other improper advantage over competitors.

Fazer also prohibits facilitation payments that are made for the personal benefit of a public official to secure or speed up the completion of a routine action.

When providing or receiving hospitality or giving or receiving gifts one should always consider whether it is appropriate, reasonable and justified under the circumstances.

Gifts and/or hospitality should never influence, or appear to influence, the integrity of business decisions or the loyalty of the individuals involved.

6. Fair competition

We compete fairly and respect competition laws in all markets where we are active.

Competition laws generally aim to preserve competition in the market and thus prohibit agreements or understandings between competitors that restrict competition or otherwise harm consumers. Such harmful actions may include price fixing, allocation of customers or markets or abuse of a dominant position or exchanging sensitive information whether directly between competitors or indirectly through e.g. trade associations.

We have a responsibility to understand competition law requirements related to our daily work as it is essential that our company and our employees adhere to competition laws and regulations.





7. Environmental responsibility

It is our responsibility to actively reduce Fazer's impact on the environment. We are committed to continuously improving our products, operations and production facilities to reduce negative impacts on the environment and to optimize resource consumption.

We respect and care for the environment and proactively communicate our environmental performance to our stakeholders.

8. Consumer safety and responsible marketing

The health and safety of consumers is never compromised. We take every precaution to secure food safety and the products that we produce need to be of highest quality and standard.

We market our products in a responsible manner.

We are committed to developing new products and services.

9. Respecting privacy

We are committed to ensure the protection of personal data of all individuals with whom Fazer engages. We handle personal information responsibly and in compliance with laws and regulations in the countries where we operate.

We exercise appropriate and due care to legally ensure than sensitive personal information is not publicly disclosed.

10. Conflicts of interest

All business decisions must always be based on objective criteria of what is best for Fazer.

A Fazer employee or director should refrain from making or influencing decisions or actions in conflict of interest situations. A conflict of interest situation arises when private interests, personal relationships or other activities influence, or appear to influence, decision making or other conduct contrary to the best interest of Fazer.



11. Protection of assets

Fazer's assets are reserved for use in company business. Company assets may not be used for personal gain or for illegal activities. This applies to physical assets as well as intellectual property and electronic assets, such as patents, trademarks, know-how and information systems.

We acknowledge that Fazer's trademarks and other intellectual property rights form a substantial part of the company's assets and they need to be actively protected.

12. Business confidentiality

We must protect and maintain the confidentiality of non-public information we have access to in our daily work or provided to us by our employees, customers, suppliers and other business partners. Confidential information is to be used only for legitimate and appropriate purposes and we will not misuse it.

13. Communications

We co-operate with decision makers and other organisations, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations which may affect legitimate business interests.

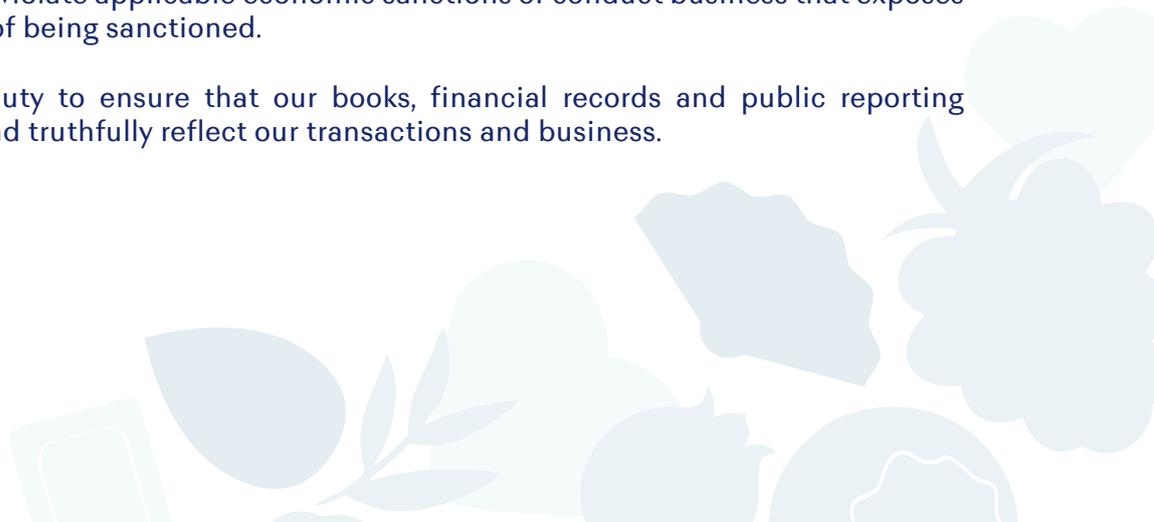
We promote openness and transparency, as well as a continuous dialogue with our stakeholders within the bounds of commercial confidentiality and we communicate always with integrity.

14. Trade law compliance, money laundering and financial reporting

We are committed to compliance with all applicable trade laws and regulations and we do not facilitate money laundering or engage in business with third parties in case trade sanctions prohibit this.

We must not violate applicable economic sanctions or conduct business that exposes Fazer to risk of being sanctioned.

We have a duty to ensure that our books, financial records and public reporting accurately and truthfully reflect our transactions and business.





SCOPE OF THE CODE OF CONDUCT

This Code of Conduct applies to all Fazer's employees and Board of Directors. We encourage our business partners to meet the requirements of this Code of Conduct. In addition, we expect our suppliers to comply with the Fazer Group Supplier Code of Conduct.

WHISTLEBLOWING

You may come across a situation that does not appear to conform with our principles as set out in our Code of Conduct, our policies or the law. In such an instance, we expect you to bring your concern to the company's attention so that we can improve our work environment and reduce risks for the Fazer Group.

If you are an employee, we expect you to report any non-conforming incidents or concerns to your direct manager or compliance officer. However, if you do not feel comfortable in doing so, or if you are not an employee, you can use our anonymous Whistleblowing system that can be found here: <https://report.whistleb.com/en/fazer>.

NON-RETALIATION

Privacy and integrity are of the greatest importance to us. This is particularly relevant when you might step forward to report a concern or suspected breach of our Code of Conduct, policies, or the law. Fazer Group prohibits any retaliation taken against an employee or business partner who, in good faith, voices their concern in such cases.

VIOLATIONS OF THE CODE OF CONDUCT

Violations of the Code of Conduct may lead to disciplinary actions, including but not limited to reprimand, warning or dismissal subject to local laws and regulations. Some serious violations of this Code of Conduct may also constitute a crime in which case Fazer Group may report the act to law enforcement authorities.

MODIFICATIONS TO THE CODE OF CONDUCT

We understand that the Code of Conduct does not cover every possible circumstance and scenario, especially when issues arise with contracts or local laws. Consequently, Fazer may modify the Code of Conduct as communicated from time to time. The current version of this Code of Conduct can be found on the Fazer Group intranet.

Approved by the Board of Directors of Oy Karl Fazer Ab on 18 March 2021



1. Laws and policies – how should I act?

EXAMPLES

DO:

- Familiarize yourself with the mandatory laws, regulations and company policies surrounding your job function.
- Follow our Code of Conduct or the law even if in some cases local practices may be different.
- Report any violations of the law or regulations or company policies which you are aware of either to your direct manager, compliance officer or through our anonymous Whistleblowing channel.
- Consult with your manager or Group Legal for guidance.

DON'T:

- Knowingly breach the law, regulations or our company policies, even if it would lead to business losses.
- Encourage your colleagues to breach the law, regulations or company policies.





2. Respect for human rights – how should I act?

EXAMPLES

DO:

- Familiarize yourself with the company's Human Rights Policy.
- Actively report any human rights abuses that you may come across in your area of work.
- Ensure that we have in place processes to avoid human rights abuses.

DON'T:

- Contract with suppliers in case it is unclear whether the supplier upholds the principles in the Supplier Code of Conduct, especially the ones surrounding human rights.



3. Respectful and harassment free environment – How should I act?

EXAMPLES

DO:

- Promote fairness, diversity and inclusion.
- Appreciate your colleagues with different backgrounds, cultures and skills.
- Report to your direct manager, local HR or compliance officer any harassment that may take place against you or your colleague whether it be bullying or other offensive behaviour such as sexual, physical or verbal abuse. You may also use the Whistleblowing channel.
- Be fair in all employment decisions and base them only on factors such as skills, performance and business needs.

DON'T:

- Negatively single out any employee.
- Bully, harass or abuse.





4. Health and safety – how should I act?

EXAMPLES

DO:

- Take the time to understand the health and safety risks present in your daily work.
- Report any unsafe conditions to your manager or in accordance with other reporting instructions your department may have.
- Participate in any mandatory health and safety trainings arranged.
- Familiarize yourself with the QEHS Policy.
- Comply with all health and safety regulations in force in the countries we operate in.
- Bring new ideas forward how to increase the level of health and safety in Fazer and encourage your colleagues to do the same.

DON'T:

- Violate health and safety requirements.
- Disregard personal safety equipment or safety devices on various machines.
- Ignore serious health hazards you might come across but report these promptly to your manager or QEHS organisation.
- Come to work when you are sick or otherwise unfit for work meaning that you should be free from any adverse effects due to medical or physical conditions such as drug or alcohol use or fatigue.



5. Anti-corruption and anti-bribery – how should I act?

EXAMPLES

DO:

- Read and comply with the Anti-Bribery Policy.
- Follow applicable laws and the Anti-Bribery Policy when providing or receiving anything of value, such as gifts, entertainment, hospitality and charitable donations.
- Report any given and accepted gifts and hospitality in accordance with the Anti-Bribery Policy.

DON'T:

- Offer, promise or give anything of value to improperly influence another in order to obtain business or other commercial advantage.
- Demand or accept anything of value or advantage for action that is illegal or unethical.
- Accept or provide facilitation payments.
- Receive gifts, hospitality or entertainment that could improperly influence, or be perceived to improperly influence, obtaining business, decisions or other commercial advantage.
- Accept a gift in cash (or equivalents), regardless of the value.





6. Fair competition – how should I act?

EXAMPLES

DO:

- Be aware of the competition law requirements related to your daily work.
- Complete any e-learnings and other competition law trainings offered to you by the company.
- Contact Group Legal if you become aware or suspect that competition law has been breached.
- Consult Group Legal proactively in any competition law questions that you may have.

DON'T:

- Agree, discuss or exchange sensitive information with competitors of Fazer such as prices, market shares, production or sales volumes, supply sources, marketing or advertising, new products, strategies or customers.
- Accept sensitive information from competitors.
- Impose minimum or fixed resale prices.
- Make arrangements with competitors that could restrict competition.



7. Environmental responsibility – how should I act?

EXAMPLES

DO:

- Understand the environmental requirements and impact associated with your daily work and how you can reduce them.
- Consider the environmental impact of the resources you may use in your work such as water, electricity, packaging and raw materials.
- Consider the environmental impacts of your decisions in the whole life-cycle of the products, including raw-materials, transportation, production, use and end-of-life treatment (waste management).
- Pay special attention to prevent and minimize the food waste – food chain causes 1/3 of the CO₂-emissions in the world.
- Sort the waste according to the local instructions to help re-using and recycling of materials.
- Report any environmental hazards or incidents that you may come across to prevent harm to environment.

DON'T:

- Disregard the environmental impact of your actions or work.
- Waste energy, raw-materials or water in your work.





8. Consumer safety and responsible marketing – how should I act?

EXAMPLES

DO:

- Market Fazer's products responsibly.
- Use professional judgement when launching marketing campaigns.
- Follow all internal policies and rules regarding product safety.
- Familiarize yourself with any mandatory legal requirements related to our products.
- Promptly report any safety issues that you may encounter such as wrong labelling in products.

DON'T:

- Leave product safety issues unattended.
- Provide false or misleading information to consumers about our products.



9. Respecting privacy – how should I act?

EXAMPLES

DO:

- Follow the policies and guidelines issued by Fazer's Privacy Organisation and participate in trainings as arranged by the company.
- Protect individual's basic right to protection of his or her personal data.
- Use only the minimum amount of personal data necessary for legitimate business purpose or legal requirement.
- Process only the personal data that you are authorized to process.
- Implement technical and organizational measures proportionate to the sensitivity of the personal information processed.

DON'T:

- Access, process, store, use, or share personal information without proper authorization or right to do so.
- Store personal data longer than necessary.
- Process sensitive personal data unless you are authorized to do so.





10. Conflicts of interest – how should I act?

EXAMPLES

DO:

- Read and comply with the Conflicts of Interest Policy.
- Avoid any activity that conflicts with the activities of Fazer or an activity that could be viewed as conflicting your objectivity or loyalty to Fazer.
- Report all existing or potential conflicts of interest to your direct manager e.g. in cases where your family member or a close friend or their company/entity seeks to do or already does business with Fazer.
- Avoid having financial interest in a company seeking to do business with Fazer without having first consulted with your manager.

DON'T:

- Supervise or be supervised by a family member.
- Make decisions or take actions on behalf of or affecting Fazer where a conflict of interest situation exists, unless separately consented by authorized persons.



11. Protection of assets – how should I act?

EXAMPLES

DO:

- Use all company assets carefully and professionally for their intended business purpose only, unless other use is specifically permitted.
- Protect all company assets entrusted with you from theft, loss, damage or misuse.
- Use Fazer's brands, patents, trademarks, know-how and other intellectual property rights responsibly and in accordance with company policies.
- Notify Group Legal of any potential infringement of Fazer's intellectual property rights you may come across.
- Report suspicions or concerns of fraudulent behaviour, theft or other misuse.
- Your part to prevent unauthorized use or access to our facilities or information systems.

DON'T:

- Use company assets for outside business or personal gain.
- Use company assets for anything illegal or unethical.





12. Business confidentiality – how should I act?

EXAMPLES

DO:

- Take precautions to avoid losing, misplacing or leaving confidential information unattended.
- Your part to keep confidential information confidential and report any misuse of confidential information or accidentally used without proper authorization.
- Take into account any insider trading laws and stock exchange regulation in case you are dealing with a publicly listed company.
- Be careful that no confidential information belonging to third parties are misused by us or accidentally used without proper authorization.

DON'T:

- Discuss confidential information or any other sensitive topics in public areas where others might overhear you e.g. in trains, restaurants or elevators.
- Share confidential information on social media or with friends or family.
- Access, use or disclose confidential information without appropriate authorization.



13. Communications – how should I act?

EXAMPLES

DO:

- Act with good judgement and integrity consistent with Fazer's values in all your communication, especially when using social media.
- Make sure to maintain a clear distinction between yourself and Fazer as a company when you communicate about Fazer.
- Be fair and honest in your communication with customers, suppliers, consumers and other business partners.
- Promote engagement and transparency.

DON'T:

- Act dishonestly or spread rumours when communicating with our customers, business partners, suppliers or consumers.
- Engage in public policy issues on behalf of Fazer unless you have authorization to do so.
- Speak to the media or engage in social media on behalf of Fazer unless you have authorization to do so.





14. Trade law compliance, money laundering and reporting – how should I act?

EXAMPLES

DO:

- Take the time to know your business partner by conducting appropriate screenings in accordance with company policies such as the Fazer Sanctions Policy and Fazer's Counterparty Due Diligence requirements.
- Be proactive in spotting irregular financial transactions in business relationship that may signal problems and promptly report your concerns.
- Be alert in case of large cash payments or unusual fund transfers to or from a foreign country.
- Follow internal processes, policies and generally accepted accounting principles so that records accurately reflect all transactions.
- Manage records properly.

DON'T:

- Falsify any record, account or transaction.

Approved by Fazer Leadership Team 12 March 2021