

Version 3.0
Date 1.4.2025
Contact person CEO



CODE OF CONDUCT

Purpose and Approving Authority

This Code of Conduct sets out the key procedures for Orfer Group's (hereinafter referred to as Orfer) operations to ensure compliance with regulations and to maintain professional and ethical standards. The Code of Conduct is approved and, if necessary, reassessed annually by the group's CEO.

Orfer's approach to operating in accordance with regulations and its values is primarily described in this Code of Conduct. To support Orfer employees in their daily work, more detailed internal guidelines at the company and operational levels have been developed and will be added to and updated as needed. By operating in accordance with the Code of Conduct, as well as external regulations and internal guidelines binding on Orfer, we ensure that Orfer's operations meet the requirements placed upon it. In this way, we earn the trust of our clients and other stakeholders.

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Introduction

Orfer Group is a family-owned company with nearly 100 employees committed to sustainable development. We recognize our important role as a stakeholder for our clientele and suppliers.

By leveraging the expertise of our employees, we help our customers save space, packaging materials, and the environment.

Sustainability is a cornerstone of Orfer's strategy, demanding a value-driven commitment to all ESG factors, encompassing environmental and social aspects, as well as compliance with regulations and ethical conduct.

We continuously develop our responsible practices and their measurements. We identify and assess risks in various areas and strive to eliminate them as far as possible. We also expect our partners to act responsibly in all areas, which is why we commit our suppliers to Orfer's Supplier Code of Conduct.

Ethical business principles support our sustainability efforts.

Our values guide our actions

We do important and meaningful work. Our core values are:



Our values guide our daily work and every decision we make.

We operate in compliance with regulations and ethically (Governance)

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We adhere to all applicable laws, regulations, and directives in all our activities.

Our ethical business principles are complemented by additional internal policies and guidelines, developed to ensure, among other things, information security and data protection, as well as to identify conflicts of interest.

1. Responsible Business Practices

- Orfer Oy and Orfer Services Oy comply with all laws and regulations relevant to its operations and conducts business with integrity.
- We pay taxes in accordance with applicable tax legislation.
- We adhere to accounting obligations and comply with related laws and regulations.

2. Bribery is Prohibited at Orfer

Bribery is a crime and is strictly prohibited in Orfer's operations. Orfer does not tolerate direct or indirect bribery, corruption, or improper influence in any form.

Orfer employees do not offer to external parties or accept gifts, payments, hospitality, or other benefits intended to influence decision-making. Any given or received gifts must not compromise the independence of the giver or receiver. Approval from a supervisor must be requested if the value of a gift exceeds €100 or if hospitality exceeds €150. Such gifts and hospitality must always be reported to the Chief Financial Officer.

Orfer has established separate Anti-Bribery Principles.

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3. Data Protection and Information Security as Part of Responsible Operations

Considering data protection and information security in all activities is an integral part of Orfer's commitment to responsibility. We handle confidential information in compliance with laws and best practices, respecting non-disclosure agreements.

Confidential information includes, for example, personal data of our customers and employees, as well as information related to the business and financial status of Orfer, our client companies, and partners. Such information is processed only by Orfer employees whose duties require it. We adhere to the guidelines provided for confidentiality, data protection, and information security.

We continuously ensure the compliance of our operations and enhance our personnel's expertise in data protection and information security by regularly reviewing and communicating these matters, for instance, during monthly meetings and more frequently if necessary.

Details on how Orfer handles personal data can be found in our privacy policy.

4. Avoiding Conflicts of Interest

A conflict of interest refers to a situation where an individual or organization has multiple interests, financial or otherwise, one of which may compromise their motivation or decision-making ability. Conflicts of interest can also negatively impact the interests of one or more of our customers and potentially breach agreements we have made.

The following situations may be considered potential conflicts of interest:

- Conducting business with a competitor, customer, or supplier, or holding a financial interest in a competitor, customer, or supplier.
- Placing oneself in a situation where a favor or service is expected in return for something received.
- Secondary employment, consulting projects, partial ownership, or ownership in a company that could influence one's work or relationship with Orfer.
- Any secondary employment that is not competitive must be reported to HR and the employee's supervisor.

Social Responsibility (Social)

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Respect for human rights is a fundamental part of Orfer's operations. We adhere to the human rights defined in the UN Universal Declaration of Human Rights, including freedom of opinion and religion, equality of all people, and the prohibition of discrimination.

Additionally, we are committed to following the eight fundamental conventions of the International Labour Organization (ILO).

Employer and Employee Principles

The relationship between employer and employee is built on mutual respect and trust. Orfer strives to provide its employees with safe and healthy working conditions. Our success is rooted in a skilled and well-being workforce. We encourage every employee to act responsibly in all their tasks.

Orfer is an equal and inclusive workplace that does not tolerate discrimination, bullying, or harassment. Any inappropriate behavior or harassment is addressed without exception. We value diversity and believe that accepting differences starts with allowing everyone to be themselves at work. The realization of equality is continuously developed and monitored through employee and equality surveys.

- At Orfer, everyone is treated equally.
- We do not tolerate any form of harassment or offensive behavior within the workplace.
- Orfer respects the fundamental rights of employees as well as applicable laws.
- We honor our employees' right to organize professionally.
- We do not accept forced labor or the use of child labor.
- We comply with laws and collective labor agreements applicable to employment relationships.
- We regularly meet with company and employee representatives to enhance collaboration.
- We invest in efficient safety risk management and prevention by regularly monitoring workplace safety conditions.
- We continuously improve working conditions in collaboration with our employees.
- We pay attention to our employees' well-being at work.
- We strive to enable a meaningful balance between work and personal life for our staff.

[Plan for equality and non-discrimination \(sharepoint.com\)](#)

[Tasa-arvo- ja yhdenvertaisuussuunnitelma 2021.docx \(sharepoint.com\)](#)

Taking Responsibility for the Environment (Environment)

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We recognize climate change and biodiversity as significant themes in our operations. We consider environmental impacts both in our own activities and throughout our supply chain. We are committed to [the Energy Efficiency Agreement for Industries' Technology Sector Action Plan](#), led by Motiva, and to implementing measures outlined in the plan to reduce our greenhouse gas emissions.

- Orfer strives to consider environmental aspects in its operations and seeks more ecological solutions whenever possible.
- We focus on energy conservation, the use of renewable energy sources, emission reduction, environmentally friendly waste management, and recycling.
- We design our products for maximum durability. We support our products throughout their lifecycle and offer services to extend their lifespan.

Every Orfer Employee is Expected to Know and Follow the Principles

Familiarization with ethical business principles is a part of every new Orfer employee's orientation when their employment begins. These principles are regularly discussed in company meetings. All Orfer employees are required to adhere to our shared principles. Supervisors are responsible for ensuring compliance. Any actions that go against the guidelines should first be discussed with one's direct supervisor. If this is not possible, employees may contact the supervisor's superior, the HR coordinator, or the Chief Financial Officer.

We expect the same adherence to these principles from the company's subcontractors and temporary workers.

All Orfer employees are encouraged to regularly assess the risks of misconduct in their work environment. We encourage everyone to report suspicions of unethical or illegal activities, as well as other forms of misconduct, whenever there are grounds for concern. Misconduct in this context refers to any negligence or act where someone seeks undue financial advantage or other benefits for themselves or others, directly or indirectly.

Orfer has an internal Whistleblowing reporting channel, where suspected misconduct can be reported anonymously. Reports are handled confidentially by the company's Ethics and Compliance Committee (YTNK). Appropriate actions are taken to prevent misconduct and rectify behavior contrary to our principles on a case-by-case basis and in a manner deemed appropriate.

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Assessment

When evaluating whether a business transaction or decision meets Orfer's Code of Conduct guidelines, professional standards, and ethical criteria, ask yourself:

Is the action in compliance with legislation and regulatory requirements?

Is the action in accordance with Orfer's internal guidelines?

Has the situation been handled correctly and independently?

Does the action appear acceptable externally?

Could a truthful and comprehensive report be made about the event?

How would our stakeholders view the action if it were to become a public topic, for example, on social media or in the media?

If the answer to any of the above preliminary questions is negative, or if you are uncertain about your assessment of the situation, the transaction should not proceed, and the matter should immediately be discussed with your supervisor, the Chief Financial Officer, or risk management.

- Convention No. 29: Forced Labour Convention (1930)
- Convention No. 105: Abolition of Forced Labour Convention (1957)
- Convention No. 138: Minimum Age Convention (1973)
- Convention No. 182: Worst Forms of Child Labour Convention (1999)
- Convention No. 87: Freedom of Association and Protection of the Right to Organise Convention (1948)
- Convention No. 98: Right to Organise and Collective Bargaining Convention (1949)
- Convention No. 100: Equal Remuneration Convention (1951)

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- Convention No. 111: Discrimination (Employment and Occupation) Convention (1958)

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