

ONE VALIO CODE OF CONDUCT - OUR WAYS OF WORKING



Code of
Conduct

2024



Code of Conduct

This Code of Conduct applies to all Valio employees around the world. Valio's Code of Conduct covers important information for employees about Valio's policies and operating principles and provides guidance on proper conduct.*

COMMON RULES ARE EVERYONE'S RIGHT AND OBLIGATION

VALIO PEOPLE

- » Valio has an important role in society and in people's daily lives.
- » Responsibility is one of our values.

RESPONSIBLE AND FAIR BUSINESS OPERATIONS

- » We comply with laws, conduct good business practices and act with integrity.
- » We market and communicate responsibly.

CONFIDENTIALITY

- » We protect Valio's intellectual property and brand
- » We respect privacy.
- » We take care of data protection and data security.

RESPONSIBLE OPERATIONS AS PART OF SOCIETY

- » We promote sustainability.
- » We respect human rights and international principles.
- » We sponsor, support and give donations according to our guidelines.
- » We select responsible collaboration partners.

RESPONSIBLE EMPLOYER

- » We lead by example.
- » We respect and value each person as an individual.
- » We are a fair and flexible employer.
- » We offer fair remuneration.
- » We ensure a healthy and safe workplace.
- » We promote a climate of trust and we address grievances.

IMPLEMENTATION OF THE CODE OF CONDUCT AT VALIO

*Please note that this is not a contract, nor does it contain any promises or guarantees of any kind. This Code of Conduct does not modify the terms of employment provided in an employment contract or employment offer.

**TOGETHER
WE MAKE
BETTER** *life*

COMMON RULES ARE EVERYONE'S RIGHT AND OBLIGATION

THE CODE OF CONDUCT covers the common rules for Valio people: what good business conduct means in practical terms, how we treat each other, and what are our operations like in line with laws and Valio's values. The Code of Conduct applies to all Valio people around the world. The Code of Conduct describes our ways of working.

Adhering to common rules is the responsibility of everyone at Valio, but clear and fair guidelines are also the right of every employee. All of us may encounter situations at work or during leisure time where we don't know how to act or are uncertain if we are within acceptable limits.

It is much easier and more comfortable to pause, consider an appropriate course of action for a moment, or seek help than to later investigate potential misconduct. And remember, in a difficult situation, it is beneficial to turn to a colleague, HR contact or supervisor and consider a solution together.

Annikka Hurme
CEO, Valio Oy
1 Jan 2024





VALIO PEOPLE

Valio has an important role in society and in people's daily lives

FOOD CONSUMPTION and production have globally significant impacts on the environment, animals and people's lives. We want to do our part in solving these challenges. We are developing sustainable food production that takes into account environmental issues, local security of supply and food safety.

Valio is owned by about 3,500 Finnish dairy farms through cooperatives, and Valio's main purpose is to pay the best possible return to the dairy farms through the cooperatives. Our business promotes self-sufficiency and employment throughout Finland.

The vitality of dairy farms and their ability to continue operating in different situations is important in securing domestic food production.

Not all crops thrive in northern conditions, but grass grows well and is the main food for cows. The world's population is growing and arable land is decreasing, so grasslands and animals will continue to be needed alongside crops.

Our products and innovations create wellbeing for people, and we want to offer a wide range of options in both dairy and plant-based products. We promote healthy lifestyles and nutritional dietary quality. We take care of the delivery reliability of food and food security.

Valio's social impact is transparent and factually based. We collaborate proactively with authorities. Valio has registered in the EU Transparency Register, and we operate in accordance with the Finnish Transparency Register Act.



Responsibility is one of our values

The vision, mission and values are shared by all Valio employees in different countries. Our shared vision describes what we want to accomplish. Our mission describes what drives our operations. Our values are the foundation for our daily activities.

Our vision
 LEADING DAIRY AND FOOD COMPANY
 WITH LOVED BRANDS AND
 INNOVATIVE SOLUTIONS.

Our mission
 TOGETHER WE MAKE LIFE BETTER.

Our values
 CONSUMER AND CUSTOMER FOCUS,
 RESPONSIBILITY, RENEWAL, COLLABORATION



CONSUMER AND CUSTOMER FOCUS

We engage in our customers' world and we offer the best customer experience.

- I focus on the customer and help create the best possible solutions for external and internal customers.
- I evaluate the added value created for the customer in my day-to-day work and prioritise my duties accordingly.



RENEWAL

We act in an agile way and are open to change.

- I have the courage to present and try new ideas, and I actively seek innovative solutions.
- I see changes as opportunities.
- I listen to others and learn from them, and I make use of the feedback I receive.
- I learn from my mistakes and try again.



RESPONSIBILITY

We take care of our owners, Valio people, animals, the environment and society. We take personal responsibility and are result-oriented.

- I act responsibly in my day-to-day work.
- My actions are based on clearly defined common goals, and I challenge myself to achieve my work goals.
- I take care of my working capacity, and I take responsibility for the continuous development of my expertise and the high quality of my work.



COLLABORATION

We help each other to achieve the best results in a solution oriented way.

- I have the courage to challenge, and I actively seek solutions to problems.
- I inspire others by my example, and I appreciate and make use of diversity.
- I ask for help, and I offer to help others.
- I share information and actively give constructive feedback.

RESPONSIBLE AND FAIR BUSINESS OPERATIONS

We comply with laws, conduct good business practices and act with integrity

IN ALL OF OUR OPERATIONS and business relationships, we comply with applicable laws, good trade practices and our agreements with partners. We continuously monitor legislation and regulations, and we integrate their requirements into our operations. If our own guidelines are stricter than the local laws, we adhere to Valio's guidelines. If, however, local legislation provides better or different protection, it is applied to employees subject to such laws.

As a responsible actor, we identify any practices that are or may be perceived as corrupt. The definition of corruption is broad and can range from illegal to reprehensible or ethically questionable. We do not tolerate direct or indirect bribery, corruption, abuse of position or improper influence in any form. We identify questionable situations and prevent them from arising.

Bribery is a form of corruption, and Valio has a zero tolerance policy for all forms of corruption. The offering or receiving of a favour or hospitality in the course of business must always be transparent,

customary and reasonable. They are always offered or received without expectation or obligation of reciprocity. Thus we do not give or accept any form of favour or hospitality that could be construed as an attempt to improperly influence decision-making.

A conflict of interest arises when an employee's personal interests or actions may affect their ability to perform their duties objectively, impartially and effectively. In decision-making, the interests of Valio override the individual's own interests. We have a responsibility to not participate in decision-making in situations where the pursuit of a self-interest is possible. **More specific instructions on avoiding bribery and conflicts of interest →**

We do not participate in business activities that have a suspected connection to money laundering, the funding of terrorism, or that have sanctions imposed on them. To ensure this, we maintain effective measures: for example, we regularly screen business partners against sanctions lists, and we react to warning signs of suspicious activities. We require the same from our customers and suppliers.

In all our activities, we comply with the competition laws in force. We value fair competition and update our competence regularly. We do not engage in any way in activity that has the purpose or potential effect of restricting or impeding effective and fair competition.

We market and communicate responsibly

THE KEY PRINCIPLES of Valio's communication are credibility, transparency, interaction and planning. Our communication is factually based. Our marketing is compliant with laws and regulations, proper, honest and factually based. We are open about our affiliations and interests related to the issue being communicated. In addition to successes, when relevant we also disclose challenges, failures and corrective measures.

We operate openly with authorities and other stakeholders. We engage in dialogue and learn from others, even when there is disagreement on issues. We organise and participate in events where we openly communicate about Valio's operations and impacts on, e.g., society and the environment. We encourage all Valio employees to be active communicators. If you are unsure about the public nature of an issue, ask your supervisor or the communications team.

When we share Valio-related content in social media, we participate in the discussion with respect for others, and we don't share trade secrets or other confidential information.

- We do not advertise or market our products directly to children under 13 years old.*
- We do not have a presence in marketing channels disseminating hate speech.
- We do not tolerate employees posting information on social media that could be viewed as hostile or threatening, or that might foment harassment or bullying.

*With the exception of Valio Akatemia program in Finland, which aims primarily to support active lifestyles and healthy nutrition among youth, in particular by awarding stipends that promote physical activity and nutritional education.



CONFIDENTIALITY

We protect Valio's intellectual property and brand

A SIGNIFICANT PART of Valio's most valuable assets is intangible. Intellectual property includes, e.g., trade secrets, know-how, patents, brands, trademarks, designs and copyrighted materials.

Intellectual property created or developed during the employment relationship is owned by Valio, if it is related to work done at Valio. Employees must respect the intellectual property rights of Valio and other parties and must comply with all applicable laws targeting the intellectual property rights of Valio and its business partners. Valio's partners must understand that the right to use intellectual property rights related to Valio's brand portfolio, such as trademarks, designs and logos, must be approved by Valio.

We protect the confidential information of our customers, Valio and other stakeholders, and we do not use such information for our own or anyone else's benefit.



We respect privacy

WE COMPLY with current laws and Valio's internal instructions in the processing of personal data. We collect, use and maintain personal data only when it is necessary for the operations and there is a legal basis to do so. We process data only to the extent necessary for the performance of our work duties. We ensure that data is used correctly and in accordance with processes and guidelines throughout its life cycle.

We respect privacy and we comply with legislation on privacy at work. For example, disclosing or commenting on the health or personal matters of a colleague or their family member is not permitted without consent from the person in question. We do not discuss with others about our customers' or partners' matters.

We take care of data protection and data security

WE CAREFULLY PROTECT and process confidential data. We follow the guidelines on confidentiality and data security. We take data security and data protection seriously, and we actively prevent the compromising of them.

Every Valio employee must complete up-to-date data security training and commit to data security in their work. We comply with applicable laws and respect privacy in data security monitoring. We report misconduct and violations using the agreed procedures. [Read about Valio's global data protection policy and information security policy](#) →

RESPONSIBLE OPERATIONS AS PART OF SOCIETY

We promote sustainability

EVERY ONE OF US is responsible in our own work for Valio's impacts on the surrounding world and society. We take the wellbeing of the environment, people and animals into consideration when we are making business decisions and in our actions in daily life.

We know our own environmental impacts, and it is our responsibility to reduce them. The principles for taking the environment into account are defined more specifically in Valio's Environmental Policy. [Read more about the Environmental Policy →](#)

Food safety is our priority in all decision-making, and we take it into account by acting in accordance with our Food Safety and Quality Policy. [Read more about Valio's global Food Safety and Quality Policy →](#)

We are resolutely improving the wellbeing of people and animals, and we are working to increase biodiversity.

We respect human rights

WE ARE COMMITTED to promoting the realisation of human rights in line with international conventions and guidelines. We have taken the principles into account in Valio's Code of Conduct and in Valio's Supplier and Distributor Code of Conduct. [Read more about the Supplier and Distributor Code of Conduct →](#)

We respect all human rights, including most vulnerable groups such as women, children and migrant workers, and we do not tolerate the violation of them in any way. We have identified our own human rights impacts, and we manage them through our due diligence process. We work continuously to prevent and mitigate the realisation of human rights risks as part of our social responsibility work. We take into account the views of affected stakeholders in our human rights work. We monitor the implementation of human rights and address any shortcomings.

We do not tolerate the use of child labour, and the age and identity of all Valio employees is verified already in the hiring phase. Valio doesn't hire anyone under 18 years old, except in the case of student internships, summer workers, or where the official age of employment is under 18, as expressly prescribed by local law. In these cases, we take the young person's age into account, e.g., in the safety of the work tasks, in working hours and in breaks.

We do not tolerate human trafficking, the use of forced labour or work in which an individual is put in a position similar to forced labour. We do not take possession of any employee's property, such as their original personal identification documents, nor do we restrict the movement of employees outside of working hours or force an employee to use and pay for accommodation provided by Valio. There are no employee fees associated with our recruitment or employment.

We respect the land use, control and ownership rights of communities and indigenous peoples as well as the access rights to water and other natural resources, and we do not tolerate land grabbing.

MAIN INTERNATIONAL AGREEMENTS AND GUIDELINES RESPECTED BY VALIO

- The International Bill of Human Rights, IBR:
 - UN Universal Declaration of Human Rights)
 - International Covenant on Civil and Political Rights
 - International Covenant on Economic, Social and Cultural Rights
- UN Guiding principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work)
- OECD Guidelines for Multinational Enterprise
- UN Convention on the Rights of the Child

We sponsor, support and give donations according to our guidelines

WE SUPPORT exercise and balanced diets among children and young people in Finland through the Valio Akatemia® programme. We may support other projects at our discretion.

We can make product donations and support stakeholders on a case-by-case basis, provided that we comply with the relevant guidelines. [Read more about sponsorships and donations →](#)

Our priority is to eliminate waste from our production. If this is not possible, we want to ensure that all waste is recycled. Waste products that are fit for consumption can be donated according to country-specific principles.



We select responsible collaboration partners

WE EXPECT our cooperation partners to operate responsibly, and we conduct thorough background checks before the start of collaboration. This applies to product sourcing, service providers and other collaboration partners in our value chain. All sourcing, i.e., purchases, must be done in accordance with Valio's sourcing process and in compliance with the sourcing policy. This way we can ensure the transparency, uniform criteria and management of sourcing.

We want to ensure responsible sourcing, and we expect our suppliers to commit to the principles described in the Supplier and Distributor Code of Conduct and to meet the food safety and sustainability approval requirements of the supplier-specific risk classification. We monitor the practices of our collaboration partners and address any violations immediately.



RESPONSIBLE EMPLOYER

We lead by example

WE ALL SHARE the same passion working at Valio: together we make life better while listening to our customers and encouraging one another.

The work contribution of every Valio employee is important. We invest in supervisory skills, people-centred management and the development of team collaboration. We want every Valio employee to have a clear understanding of their own job and goals, and the opportunity to influence their own work and expertise. Interaction between management and personnel is regular and issues are discussed openly.

MANAGEMENT IS GUIDED BY THE SHARED LEADERSHIP PROMISE

Supervisors and experts at Valio:

- inspire employees to achieve common goals, and lead the way
- continuously improve operations and facilitate change and development
- clarify goals and ensure that the right people are in the right jobs
- encourage participation, are present for employees and help others succeed
- see the big picture and focus on the essential
- act in accordance with Valio's values



We respect and value each person as an individual

IN OUR OPERATIONS we draw on the opportunities brought by diversity. We learn from each other and increase understanding from different perspectives. Diversity, equality and inclusion are themes that we promote in our work communities by raising awareness and by reviewing our existing practices to ensure equal treatment and further improve inclusion. We regularly ask Valio employees for their opinions through the global Valio Voice survey. The survey is answered anonymously and covers a range of topics, such as work engagement, wellbeing at work, harassment and discrimination. The surveys are used to initiate actions when needed in teams, functions or throughout Valio.

For us it is important that Valio is a workplace that is free of discrimination and harassment, and that all people are treated respectfully. All people are equal at Valio, and we do not discriminate against anyone based on their gender identity, age, ethnic origin, nationality, language, religion, beliefs, opinions, political activities, trade union activities, family relationships, health, disability, sexual orientation or other characteristic related to their person. We make sure that there is no discrimination of individuals at any phase of the employment relationship such as recruiting, remuneration, changes in job duties or access to training.

- We do not tolerate physical, psychological, sexual or verbal abuse and harassment or intimidation and bullying of any kind.

We are a fair and flexible employer

WE ARE A RELIABLE and fair employer. We comply with international agreements, local legislation, and possible collective agreements related to the employment relationship. We do not circumvent employer obligations through, e.g., unwarranted internships, leased labour, or subcontracted work; instead, we make sure that every employee has a legitimate reason for their role and fair working conditions.

We offer every Valio employee opportunities for development, renewal and on-the-job learning. Valio employees are also encouraged to actively maintain and develop their competencies to meet both current and future skills needs.

We support employee success at work, taking into account the current stage of life and work, and we offer flexible solutions if the work allows for such. These include, where applicable, various flexible work arrangements, work and working-time arrangements and return to work support. We invest in tools that enable efficient, ergonomic and flexible work performance, and we support hybrid working opportunities if job duties allow for such.

#Valiopeople

- All employees receive clearly stated written terms of employment through an employment offer letter or employment contract.
- We give our employees paid annual leave and sick leave.
- All Valio employees' working hours comply with laws or applicable collective agreements.
- Employees have at least one (1) day off per seven (7) working day period, and overtime is voluntary.
- All employees are free to accept a job or to resign in accordance with the terms of the employment agreement or employment offer letter, without penalties or fines.
- We respect our employees' right to join a trade union of their choice or to form one, as well as the collective bargaining rights of employees.

We offer fair remuneration

THE PREMISE of Valio's remuneration is a remuneration package that supports Valio's strategy, goals and values. The aim of remuneration is to encourage employees to achieve set targets and to strive for performance excellence.

Valio ensures the equal and fair treatment of all employees by linking remuneration to job duties, the local wage level, and the performance of the individual and/ team/ company. It is important to Valio to pay competitive wages consistent with the job description. Possible collective agreements and remuneration surveys help to ensure this. Valio's remuneration package consists of competitive wages, performance-based bonuses, employee benefits that support wellbeing, and an inspiring and friendly working environment.

- In all our countries of operation, we pay wages that are in line with any collective agreements or country-specific minimum wage and comply with applicable equal pay law and wage transparency regulations.
- We regularly monitor possible changes in legislation and collective agreements, and we take account of these changes in our operations.
- We pay our employees for the whole pay period in full and on time.
- Deductions from pay are always done in accordance with legislation and possible collective agreements.
- All employees receive a pay slip that describes the basis for determining the wages and the statutory deductions.
- We ensure the equal and fair treatment of all employees by linking remuneration to the job and its demands, to the local pay level, to the payroll system and to individual and/or company performance.



We ensure a healthy and safe workplace

ENSURING THE OCCUPATIONAL SAFETY and health of Valio employees is of utmost importance in all our operations. Our goal is to eliminate or minimise hazards targeting personnel, operations and property, and to manage stress factors. We want to ensure the wellbeing and working capacity of our employees throughout their employment.

Our goal is for zero injuries and accidents.

Safety responsibility and management is clearly defined as the role of supervisors and managers. However, it is everyone's responsibility to work safely and to comply with rules and regulations, and it is a condition of employment with Valio. Everyone is expected to monitor the safety of the working environment and to address any deficiencies. Valio's Health and Safety Policy sets out the principles of safety management. [Read more about Valio's Health and Safety Policy →](#)

We support Valio employees' capacity to work and to cope with changes and challenges in working life in close cooperation with the occupational safety organisation and occupational health care. We have a variety of country specific measures to improve Valio employees' work wellbeing and working capacity and to prevent employees incapacity to work. Valio does not tolerate working at or visiting the workplace while under the influence of alcohol or drugs. We are committed to ensuring a drug-free and safe working environment for all our employees. At celebratory events, we can raise a glass together.



We promote a climate of trust and we address grievances

VALIO'S CODE OF CONDUCT creates common rules for us and is an important part of the induction of a new employee and the knowledge of every Valio employee.

It is important to immediately address all inappropriate, dangerous or otherwise prohibited activity. We want all issues to be open to discussion, confidentially and with a focus on a solution. We have country-specific practices known to employees for handling possible misconduct. The goal of these practices is to ensure a fair review of matters from the perspective of all parties.

If you suspect or notice activities in violation of the Code of Conduct, contact your own supervisor, the manager of your function or HR contact. If that feels uncomfortable, you can anonymously report any concerns via the Valio Whistle channel. All reports are taken seriously and handled confidentially. There will be no consequences penalties or retaliation against an employee who reports misconduct. [Read more about the Whistleblowing channel →](#)

It is easier to stop and think for a moment about the right way to act than it is to discuss any misconduct afterwards. And remember, in a difficult situation it is often good to turn to a colleague, supervisor or HR contact and think about a solution together.



IMPLEMENTATION OF THE CODE OF CONDUCT AT VALIO

IMPLEMENTATION AND MAINTENANCE

- » Valio's Senior Vice President of Sustainability is responsible for Code of Conduct documentation and maintains it with separately appointed experts and managers in the area of responsibility.
- » The implementation and timeliness of the Code of Conduct policies are reviewed annually by the Valio Executive Board.

APPROVAL

- » The Valio Executive Board is responsible for approving the Code of Conduct.

COMMUNICATION AND DEPLOYMENT

- » It is the responsibility of every Executive Board member to communicate Valio's Code of Conduct (also new versions/modifications) to their own organisations.
- » Every manager and supervisor is responsible for the practical deployment of the Code of Conduct policies.

COMMITMENT

- » We introduce all new Valio employees to the Code of Conduct as part of Valio's induction programme.
- » All Valio employees complete the online Code of Conduct training whenever the Code of Conduct is updated, and they receive support from their supervisor in interpreting the guidelines.
- » We communicate regularly on Code of Conduct topics, and we provide more specific training on the topics to relevant target groups.
- » Compliance with the Code of Conduct is the responsibility of every Valio employee. We also help our colleagues to choose the right ways of working, and we maintain a good work atmosphere.