

Valmet's Code of Conduct

Dear Valmet Colleague and Partner,

Valmet's Code of Conduct is a set of rules that define the morals and ethics, responsibilities, and proper practices for every one of us – as individuals, teams, and as a company.

The purpose of the Code is to protect Valmet's business by informing all Valmet personnel, as well as our partners and suppliers, of the company's requirements and expectations.

Valmet operates in a very competitive business environment, and we sometimes face a lot of pressure to extend our flexibility to cope with the demands surrounding us. People may also actively try to persuade us to act in a way that would breach our Code of Conduct. But for Valmet the only way to act is the honest and truthful way, which is also the only sustainable way.

Furthermore, with more than 200 years of industrial history and a reputation as a global leader in our fields of business – people look up to us. That respect is a very valuable asset to Valmet as a company and each of us as an individual, and we want to ensure that we will be worth everybody's trust and expectations also in the future. Supported by our Values, the Code of Conduct is our prime tool and guidance in securing that.

This leaflet summarizes the Code and serves as a reminder of the dos and don'ts when working for Valmet. Valmet's Code of Conduct is valid in every part of our organization, around the world, every day. There are no exceptions to it.

Our Code of Conduct is communicated to all corners of the Valmet world – our people, our partners, suppliers, and business contacts. Now it is time for every one of us to learn about it, apply it, and make it part of our everyday work.

Pasi Laine
President and CEO
Valmet

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Our values

Valmet's shared values form the foundation for everything we do at Valmet, and they strongly support our Code of Conduct.

Our values guide and shape our behavior and connect us to our mission, strategy, must-wins and vision – Valmet's Way Forward.

Customer – We move our customers' performance forward.

Renewal – We promote new ideas to create the future.

Excellence – We improve every day to deliver results.

People – We work together to make a difference.

Since our values were created from within, we also live them from within, in our own roles and tasks.

Challenge yourself to find what our values mean in your own daily work and challenge your colleagues to live them!

Business principles

Integrity

- Integrity is fundamental to all of our actions, statements and reporting, and is an essential aspect of sustainability.
- We respect our promises and commitments.
- We are honest and fair in all our dealings.

For Valmet, integrity means honesty and strong moral principles.

Compliance with laws and regulations

- We are committed to full compliance with all applicable national and international laws and regulations.
- We expect our business partners to fully comply with all applicable laws and regulations.
- Should these prove to be insufficient or open to interpretation, we seek out and consult with the best available expertise.

Product and service quality

- We always strive to deliver the quality we have promised.
- We are committed to the continuous improvement of the quality and reliability of our products and services.
- We also expect a high level of quality in our internal work and interaction with our co-workers.

Dos and Don'ts:

Do deliver the quality you promise.

Do not accept poor quality.

Fair competition and compliance with anti-trust legislation

- We support and strive for fair competition and free markets, and thus we refuse to enter into discussions or agreements with competitors concerning pricing, market share, or other similar activities.
- We do not become involved in business relationships that may lead to conflicts of interest.

Dos and Don'ts:

- Do comply with the competition legislation of the countries we operate in and with our Internal Competition Guidelines.
- Do familiarize yourself with all appropriate e-learning opportunities.

Transparency and openness

- We provide our stakeholders with information on our status and performance simultaneously and equally, transparently and openly, without preference or favor for any group or individual, and in compliance with the law, the rules and regulations of the stock exchange, and the accepted practices of the equity and debt capital markets.
- We promote a culture of transparency and openness in the way we work.

Dos and Don'ts:

- Do not use insider information directly or indirectly in stock trading.
- Do speak up and encourage others to express their opinions.
- Do interact continuously with authorities and non-governmental organizations in order to develop and sustain open and direct contact with society.

Intellectual property and company assets

- We value the creation and protection of knowledge and intellectual property.
- We act to safeguard Valmet's intellectual property and do not allow unauthorized access to it.
- We respect the intellectual property held by other parties and do not try to obtain it by illegal means.
- We encourage and support employee commitment, efforts, and contribution to increase our intellectual property.
- We safeguard confidential information, information systems, and technology, as well as Valmet's physical assets, from loss, theft and misuse.
- We use electronic communication technology responsibly and professionally.

Dos and Don'ts:

- Do treat any kind of sensitive or confidential information with care.
- Do use electronic equipment provided by Valmet for the company's business activities.
- Do not use electronic equipment provided by Valmet irresponsibly. Consider carefully before posting, storing, transmitting, downloading, or distributing content or material whether it could possibly be considered threatening, abusive, libelous, or obscene.
- Do familiarize yourself with the IT Usage Policy.

Rejection of corruption and bribery

- We have a zero-tolerance approach towards all forms of corruption and bribery.
- We are committed to conducting our activities in accordance with all applicable anti-corruption laws.
- We do not do business with consultants, agents, suppliers, or any other partners who do not fully comply with anti-bribery laws and regulations.

Dos and Don'ts:

- Do familiarize yourself with our Anti-Corruption Policy.
- Do not become involved in business relationships that may lead to conflicts of interest.
- Do not accept gifts from business partners exceeding normal standards of hospitality. If the acceptance of a gift or favor includes the remote possibility of a conflict of interest, always clarify the situation with management in advance.
- Do not pay or give bribes or illegal payments to obtain or retain business.
- Do not directly or indirectly provide, or accept, gifts in the form of cash or cash equivalents, e.g. vouchers.
- Do not pay to facilitate favorable decisions or services from authorities.
- Do refuse to participate in or support money-laundering under any circumstances in our operations worldwide.

Responsible supply chain

- We expect our suppliers and contractors to demonstrate high ethical standards and comply with our Sustainable Supply Chain Policy.
- We actively monitor our suppliers' compliance with sustainability.
- We strive to minimize the environmental footprint of our value chain together with our suppliers.

Dos and Don'ts:

- Do expect all partners and suppliers to comply with Valmet's Sustainable Supply Chain Policy.
- Do evaluate suppliers based on their potential risk levels for Valmet.

People and Society

Human rights

- We support and respect the protection of human rights as expressed in the United Nations Declaration of Human Rights and we are committed to the United Nations “Protect, Respect and Remedy” Framework and the related Guiding Principles on Business and Human Rights.
- As an employer, Valmet supports the basic labor rights stated by the International Labor Organization (ILO): freedom of association, effective recognition of the right to collective bargaining, abolition of forced labor, and equality of opportunity and treatment.
- We do not use child labor or engage subcontractors or suppliers that do so.

Dos and Don'ts

- Do respect local cultures, customs, and the values of local people and societies wherever we operate.
- Do actively participate in dialogue with local stakeholders.

Equal opportunities and non-discrimination

- We promote equal opportunities, diversity and inclusion.
- We select and appoint employees based on their personal qualifications and skills for the job.
- We do not engage in or support discrimination in any of our management or human resources practices, regardless of gender, age, race, religion or beliefs, ethnic or national origin, marital/civil partnership status, sexuality, or disability.
- We appreciate diversity in our employees' background, talent, insight, education and experience, and we believe this contributes to our success and sustainability by enhancing innovativeness, flexibility, and the ability to communicate with our stakeholders.

Dos and Don'ts

- Do familiarize yourself with our Equal Opportunity and Diversity Policy.
- Do build teams of individuals with different backgrounds and skills.
- Do not discriminate against any employee on the grounds of their gender, age, race, religion or beliefs, ethnic or national origin, marital/civil partnership status, sexuality, or disability.

Respectful and harassment-free work environment

- We value teamwork as an important part of our organization's success. In working together, we will treat each other with respect, courtesy and fairness.
- We safeguard our right to work in an environment free from harassment.

- We do not tolerate any conduct by any employee or person associated with our business activities that harasses, threatens, disrupts, or interferes with another person's work performance or creates an intimidating, offensive, abusive, or hostile work environment.

Dos and Don'ts

- Do respect other persons' points of view in your daily activities.
- Do respect cultural differences.
- Do not tolerate any form of harassment including violence, sexual harassment, or abuse of any kind.

Health, safety, and wellbeing at work

- We are committed to providing a safe, healthy, and well-managed working environment and focus on continuously improving safe systems of work while eliminating hazards in accordance with best practice.
- We believe workplace incidents, injuries, and illnesses are preventable and can be eliminated. Our goal is zero harm, wherever we operate.
- We expect our personnel to take responsibility for our own safety and the safety of their co-workers.

Dos and Don'ts

- Do comply with applicable health and safety laws and regulations, and with our HSE Policy and the Minimum Safety Standards and procedures.
- Do use personal protective equipment as instructed and make sure you get the appropriate safety training for your job.
- Do work in a safe manner without risk to yourself, others, or the environment.
- Do not take any unsafe action, or an action for which you are not trained, and inform your supervisor if you are asked to do so.
- Do not possess or consume illegal drugs, and do not be under the influence of alcohol or drugs at work.
- Do report all incidents, near miss cases, or HSE risks.

Community involvement and sponsorship

- We encourage all our units and all personnel to participate in community programs promoting the common good.
- We support programs related to youth activities, science and research, culture, environmental protection, and nature conservation.
- We do not make payments or donations to political parties or individual politicians.

Dos and Don'ts

- Do comply with our Sponsorship Policy.
- Do sponsor projects that are widely accepted and respected.

- Do not sponsor projects or initiatives related to politics, religion, or other ideological organizations that are controversial. Do not sponsor national or international competitions and professional sports.
- Do not sponsor activities that conflict with the principles of sustainable development.

Environmental Responsibility

Environmental management

- We are committed to managing our operations in an environmentally responsible manner.
- We focus on continuously improving the efficiency of our operations while reducing our environmental impact in accordance with best practice.
- We act as responsible citizens and stewards by complying with environmental laws and regulations, and we expect our suppliers and contractors to do the same.
- We establish and adhere to environmentally sound policies and practices in product design, engineering, and manufacturing.

Dos and Don'ts

- Do comply with our HSE and other related policies.
- Do contribute to our environmental goals and the sustainable use of natural resources through your own behavior.
- Do report environmental hazards and incidents.
- Do actively discuss how to reduce the environmental impacts of our operations and value chain with suppliers, customers, and other partners.
- Do not breach environmental laws and regulations.

Sustainable products and services

- We are committed to providing our customers with products and services that are safe and reliable.
- We strive to actively recognize our customers' needs and increase production efficiency and occupational safety, widen the raw material base, enhance the quality and sustainability of end products, and develop totally new innovations.
- We continuously improve the energy efficiency of our solutions in our technology centers.
- We offer our customers product life-cycle support that ensures the best long-term environmental performance.
- We educate and encourage our customers to use the products they purchase from us in environmentally responsible ways.
- We encourage all our personnel to participate to innovate and find ways to reduce the environmental impact of our products and services.

Dos and Don'ts

- Do work every day to offer our customers solutions that require less water, energy, waste, and raw materials, and enable the use of renewable resources.
- Do actively engage and cooperate with our customers, research institutions, and universities to collect information on customers' sustainability needs and to develop new solutions for the market.

- Do focus on improving the performance and cost efficiency of the existing product portfolio.
- Do actively listen to customers' signals for future needs and help them innovate new ways.

Reporting misconduct

- We encourage our employees and stakeholders to speak up and voice their serious concerns. Employees are encouraged to contact their supervisors, managers, or other appropriate personnel when in doubt about the best course of action in a particular situation. Ask before you act.
- Employees are required to report any possible violations of our Code of Conduct to their superior, or to the HR, Legal, or Internal Audit functions.
- Valmet offers an anonymous, web-based channel for reporting violations of our Code of Conduct. It provides Valmet employees and other stakeholders with the possibility to report anonymously and in their native language. In China, a call center can also be contacted. The web-based channel is maintained by an external party and is designed to guarantee anonymity.
- All reported cases will be taken seriously, investigated, and resolved appropriately.
- We do not tolerate retaliation of any kind against persons who voice their concerns or assist in investigations of possible violations.
- We will ensure confidentiality for anyone reporting suspected violations. There will be no retribution or punishment for any person who reports a suspected violation in good faith.
- Individuals who are found to have violated our policies and/or this Code of Conduct, as well as those who may have failed to detect or report the situation, will receive appropriate disciplinary action, up to and including termination of employment.

This Code of Conduct is for everyone, everywhere, every day.