



Grano Supplier Code of Conduct

Grano Supplier Code of Conduct



CONTENTS

| | |
|--|---|
| Purpose..... | 3 |
| Application | 3 |
| Ethical conduct | 3 |
| Restriction of competition and cartels | 3 |
| Bribery and corruption..... | 3 |
| Human rights and working conditions | 4 |
| Human rights..... | 4 |
| Child labour | 4 |
| Forced labour | 4 |
| Freedom of association..... | 4 |
| Inappropriate treatment, harassment and discrimination | 4 |
| Working hours, employment contracts and compensation | 4 |
| Health and safety | 5 |
| Promotion of environmental protection..... | 5 |
| Product origin and product safety | 5 |
| Wood-based materials | 5 |
| PVC..... | 5 |
| Chemical safety and restricted substances | 6 |
| REACH | 6 |
| RoHS..... | 6 |
| Persistent Organic Pollutants (POPs) | 6 |
| Biocidal Products Regulation (BPR) | 6 |
| Packaging materials and packaging waste | 6 |
| California Proposition 65 | 6 |
| Conflict Minerals..... | 6 |
| Compliance with law | 6 |
| Privacy, data protection and confidentiality | 7 |
| Monitoring and possible infringements..... | 7 |



PURPOSE

We want to build a safer, more sustainable, equal, ethical and environmentally friendly future. We are committed to long-term work to further develop our sustainable operations. We have signed the UN Global Compact initiative and are committed to supporting and implementing the Ten Principles of human rights, good working conditions, the environment and anti-corruption.

Our sustainability work will take into account the UN Sustainable Development Goals that are essential to our activities. Through active efforts to achieve our sustainability goals, we will ensure that Grano creates added value for its customers while acting in accordance with the principles of sustainable development. We want to develop and maintain successful business operations while working towards a sustainable future.

One of the key parts of our business is cooperation with our suppliers. In recognition of this, we want to ensure that our entire supply chain operates responsibly and sustainably. To this end we have drawn up this Supplier Code of Conduct, which all our suppliers are required to comply with. It is based on Grano's own ethical principles, the UN Global Compact initiative, the UN Sustainable Development Goals, the ILO's Declaration on Fundamental Principles and Rights at Work and the UN's Universal Declaration of Human Rights.

APPLICATION

This Supplier Code of Conduct applies to all cooperation partners of Grano Group companies (hereinafter 'Grano' or 'the Company') that supply products or services to the Company or operate as subcontractors on behalf of the Company (hereinafter 'Supplier'). The Supplier must ensure that its own suppliers and subcontractors also operate in accordance with rules that correspond at minimum to the requirements of this Supplier Code of Conduct.

ETHICAL CONDUCT

RESTRICTION OF COMPETITION AND CARTELS

The Supplier is required to engage in fair competition and comply with applicable competition laws and regulations in order to guarantee fair business operations and fair competition. All types of price fixing, market or customer sharing, collusive tendering or other comparable activities are prohibited. Conflicts of interest between the Supplier and the Company must also be avoided. These can be caused by e.g. personal financial interests, the hiring of family members or friends or the purchase of goods or services from family members or friends.

BRIBERY AND CORRUPTION

Grano does not accept any type of dishonest conduct, such as bribery, conflicts of interest, fraud, blackmail, embezzlement or other illegal means of exerting pressure. The Supplier shall not give or accept bribes or key money or utilise any other unfair advantages to obtain a contract or to promote trading in general. The Supplier must ensure that any employees or subcontractors acting on behalf of the Supplier do not offer, promise, give or accept bribes that exceed normal and accepted hospitality or other inappropriate payments to ensure that an inappropriate benefit is realised.



HUMAN RIGHTS AND WORKING CONDITIONS

The Supplier must defend the rights of employees and treat everyone equally, respectfully and with dignity.

HUMAN RIGHTS

The Supplier must respect and comply with human rights in accordance with the UN's Universal Declaration of Human Rights, national laws and international agreements. The Supplier must establish processes and practices to ensure human rights and safe working conditions and monitor their realisation in their own activities.

CHILD LABOUR

The use of child labour is strictly prohibited. The Supplier must ensure that no labour younger than the prescribed minimum age is used in the manufacture or distribution of its products or services. Regardless of the prescribed minimum age, the Supplier must not hire persons under the age of 15. The Supplier is not allowed to use young people (under 18 years of age) to carry out hazardous work. The work carried out by young people must not endanger their health or development or hinder their education.

FORCED LABOUR

All work must be voluntary, and employees must have the right to leave or resign from work. The Supplier is not allowed to use slave labour, forced or indentured labour or forced prison labour. The Supplier is not allowed to be involved in human trafficking or exploitation or import goods the manufacture of which involves the use of slave labour or human trafficking. Forced labour is not acceptable in any form. The Supplier does not have the right to require employees to hand over identity cards, passports, work permits or other similar documents issued by public authorities as a condition for work. The Supplier must also ensure that employees are not required to pay any contributions to obtain work during the entire hiring process.

FREEDOM OF ASSOCIATION

The Supplier must uphold the freedom of association and the effective recognition of the right to collective bargaining. The Supplier must also respect the right of workers to join or not join a trade union or organisation and the right to organise in accordance with national legislation.

INAPPROPRIATE TREATMENT, HARASSMENT AND DISCRIMINATION

The Supplier must provide a working environment that ensures the fair and equal treatment of its personnel. Inappropriate treatment, harassment or discrimination (related to age, gender, nationality, ethnic background, race, marital status, religion, political opinion, disability, sexual orientation or other similar factors) must not be allowed.

WORKING HOURS, EMPLOYMENT CONTRACTS AND COMPENSATION

The Supplier must agree to comply with current legislation and the collective agreement of its sector regarding working hours, holidays, breaks, overtime, compensation and minimum wages. Wages and compensation must be paid on a regular basis and no disciplinary deductions shall be made. Employees must have the right to take statutory annual leave, sick leave and maternity/paternity leave without any negative consequences for the employee. The Supplier must provide equal pay for equal work without discrimination.



HEALTH AND SAFETY

The Supplier agrees to ensure safe working conditions and a healthy working environment for its employees. The Supplier must prevent employees from being exposed to health or safety hazards and occupational diseases and proactively manage the risks related to the safety of the working environment and its personnel. The Supplier shall ensure that its employees have access to adequate protective equipment and are provided with sufficient training to carry out their work safely. Emergency preparedness must be maintained.

The Supplier's employees are not allowed to be under the influence of alcohol or narcotics at the workplace or during work.

The Supplier must provide at least statutory occupational health care services and insurance coverage for all its employees.

PROMOTION OF ENVIRONMENTAL PROTECTION

The Supplier must operate without causing unnecessary strain on the environment and promote environmental protection in its own operations. The Supplier is responsible for ensuring that any environmental permits and registrations required are up to date and that all applicable environmental laws are complied with. The Supplier must identify the notable environmental aspects of its own operations and minimise their negative impacts on the environment. The Supplier must monitor and measure its environmental impacts and engage in continuous, objective-oriented improvement to develop its level of environmental protection. The Supplier must also ensure the adequate environmental awareness of its personnel.

Grano is committed to reducing the climate impacts of its own operations. Our suppliers play a key role in achieving our objectives. That is why we encourage our suppliers to create systems suitable for their own operations to assess the greenhouse gas emissions generated by their operations and create measures to reduce these emissions. We prefer low-emission or carbon neutral products.

PRODUCT ORIGIN AND PRODUCT SAFETY

Particular attention must be paid to the quality and product safety of products and services, and the Supplier must have appropriate practices in place for ensuring product safety and quality. The Supplier must be aware of the origin of the raw materials that it uses, ensure the traceability of raw materials and finished products and make sure that its products are safe for both humans and the environment. The use of animal testing in product development is prohibited.

The Supplier agrees to provide information on the origin of its products and documentation related to the products upon request. These include e.g. technical information, certificates, safety data sheets, certificates of conformity, product descriptions and classifications.

Wood-based materials

We do not accept any wood-based materials coming from endangered forests, illegally logged forests or forests of significant conservation value. In all wood-based materials (e.g. paper, cardboard, paperboard, etc.), we favour PEFC or FSC certified materials.

PVC

The packaging and packing materials of products delivered to Grano must not contain any PVC.



CHEMICAL SAFETY AND RESTRICTED SUBSTANCES

The Supplier is aware of the requirements of the regulations concerning chemicals mentioned below and ensures that the products delivered to the Company comply with these regulations and do not contain any prohibited substances mentioned in the regulations. The Supplier is obliged to immediately notify the Company if the materials or items supplied do not meet the requirements of these regulations.

REACH

EC 1907/2006 (REACH Annex XVII, XIII)

Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1907-20180509&from=en>

<https://echa.europa.eu/substances-restricted-under-reach>

<https://echa.europa.eu/candidate-list-table>

RoHS

EU RoHS, 2011/65/EU + EU 2015/863

Directive 2011/65/EU of the European parliament and of the council on the restriction of the use of certain hazardous substances in electrical and electronic equipment and amending Annex II to Directive 2011/65/EU

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0065&from=en>

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015L0863&from=EN>

Persistent Organic Pollutants (POPs)

Stockholm Convention on Persistent Organic Pollutant (EU) 1021/2019 (POPs)

http://ec.europa.eu/environment/chemicals/international_conventions/index_en.htm

Biocidal Products Regulation (BPR)

Biocidal Product Regulation EU No 528/2012 <https://echa.europa.eu/web/guest/regulations/biocidal-products-regulation/treated-articles>

Packaging materials and packaging waste

European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:01994L0062-20180704>

California Proposition 65

Safe Drinking Water and Toxic Enforcement Act of 1986: California Proposition 65

<https://oehha.ca.gov/proposition-65/law/proposition-65-law-and-regulations>

<https://oehha.ca.gov/proposition-65/chemicals>

Conflict Minerals

Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32017R0821&qid=1670490412194>

COMPLIANCE WITH LAW

The Supplier must comply with all applicable laws and regulations in the countries in which it operates.



PRIVACY, DATA PROTECTION AND CONFIDENTIALITY

The Supplier shall safeguard the privacy of its own and its business partners' employees. Personal data must be processed in accordance with laws and regulations relating to data protection.

The Supplier must respect the Company's confidential business information and intellectual property rights and process them in a manner that does not violate the interests of the Company, its clients or any third parties.

MONITORING AND POSSIBLE INFRINGEMENTS

Grano reserves the right to request the Supplier to carry out self-assessments and the right to carry out inspections or audits or have a third party carry out inspections or audits on the Supplier's premises to ensure compliance with this Supplier Code of Conduct. However, such inspections or audits shall not be carried out without advance notification.

If there is reason to suspect non-compliance with this Supplier Code of Conduct, we ask to be informed of this without delay. Suspicions can be reported either directly to Grano's Sustainability Director or anonymously through our company's whistleblowing channel (<https://www.grano.fi/vastuullisuus/grano-whistleblowing>). Grano monitors and assesses its suppliers' compliance with this Supplier Code of Conduct. Any instances of non-compliance are processed without delay and may jeopardise or terminate the business relationship.

By signing this Supplier Code of Conduct, the Supplier agrees to comply with it in practice and report any non-compliance or suspicions thereof to Grano without delay.

Company and business ID

Signature

Place

Name in block letters

____/____ 20____
Date

Position/Title

Enquiries:

*Grano Group Oy
Janne Meskanen
Hankintajohtaja
janne.meskanen@grano.fi
p.040 684 0860*

