Verman Group

Code of Conduct

for employees

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Introduction

This Code of Conduct defines our common rules of conduct, which guide us to act responsibly and ethically in all situations. They describe what is expected of us at work and in the workplace. The guidelines support the Group's values and compliance with legislation and internal guidelines. The Verman Group consists of the following companies:

- Oy Verman Ab
- Leader Foods Oy
- Leader Snack Factory Oy
- Biosym A/S
- Nordic by Nature Oy
- Verman Sverige AB
- Verman AS
- Boma Lecithin GmbH

If any instructions or situations seem unclear, feel free to discuss them with your supervisor. You can also use the instructions on the intranet and HR support to find the right solution.

This Guideline has been approved by the Executive Management Team of the Verman Group in Vantaa on 19 December 2025.

Who does the Code of Conduct apply to?

The Code of Conduct applies to **all Verman Group employees** in all companies belonging to the Group, regardless of their role, position or form of employment. Each of us is responsible for ensuring that we act in accordance with these principles.

Why is the Code of Conduct important?

Common guidelines create the basis for **trust, safety and responsibility**. This Code of Conduct reflects our values guiding every decision and action. Each of is is responsible for following these guidelines.

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OUR VALUES



We win together.

We foster a winning culture by celebrating our successes, learning from our challenges, and striving for excellence in everything we do. We achieve more together than alone. Through collaboration, sharing our knowledge, and supporting each other, we reach our shared goals.



We take responsibility.

We trust each other. We all take and carry and offer solutions to make things happen.



We improve lives through consumer focus.

We understand consumers' needs and act based on them. We promote well-being and better lives in all that we do.



We stay curious and grow.

We ask questions, challenge the status quo, and constantly develop both our business and ourselves. Openness to new ideas and the drive to grow keep us moving forward.

Key principles that everyone should follow

1. **Illegal activities are strictly prohibited**
   We never participate in activities that violate the law or official regulations. This applies to all work-related activities, decision-making and cooperation.

2. **We respect each other and act professionally**
   Everyone deserves fair, friendly and respectful treatment. We act courteously and professionally in all situations with colleagues, customers and partners alike.

3. **We adhere to the Group's values and Code of Conduct**
   The Group's values and this Code of Conduct form a common foundation that guides everything we do. Everyone is responsible for ensuring that they are reflected in our daily work.

4. **We protect the company's reputation**
   Every action and decision affects how the Verman Group is perceived. We always act in a way that strengthens trust and maintains the company's good reputation.

5. **We make responsible decisions**
   We avoid conflicts of interest and ask ourselves: *How would this look if the decision were public?* Our decision-making is guided by the Group's values, legality and transparency.

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Compliance with laws

We always operate in accordance with the law and official regulations. Illegal activity is strictly prohibited in all circumstances, and every employee is responsible for familiarising themselves with the regulations and guidelines relating to their work.

We always adhere to the following principles:

- **We always operate in accordance with the law and official regulations.** This must be implemented in all situations.
- **Every employee is responsible for being familiar with the regulations**, guidelines and Verman's internal practices related to their work.

Remember: Never participate in activities that violate the law or official regulations – under any circumstances.

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Responsible business and integrity

We always act honestly, openly and in accordance with our values. Responsibility in business means that we avoid unethical practices, keep our decisions transparent and protect confidential information. Every employee is responsible for ensuring that their actions can withstand public evaluation.

What this means in practice:

- **We do not accept bribery, corruption or unethical benefits**. We act fairly and honestly and ensure accurate accounting.
- **We avoid conflicts of interest and situations** where personal interests may influence decisions. We report conflicts of interest without delay.
- **Confidential information is handled with care** and only for the purpose for which it was provided. We do not share information without permission.
- **We cooperate with the authorities openly**, truthfully and in accordance with the rules.
- **All donations are made transparently**, openly and occasionally without attempts to influence decision-making.
- **Hospitality offered to customers** must be reasonable in value.
- **We cover our own travel and accommodation costs** when visiting partners or attending events.
- **Personal gifts received from partners** (e.g. on special occasions or at Christmas) **must be customary and reasonable**. In competitive situations, particular discretion and caution must be exercised when accepting gifts. Discuss with your supervisor if a gift seems unusual or its value is questionable.

Remember: Always act honestly and openly – keep your actions transparent and ensure that every decision can be justified.

Human rights

The Verman Group respects internationally recognised human rights in all its activities. We do not accept human rights violations in any form, and we expect the same from every employee.

Principles we always follow:

- **We treat all employees fairly** and with respect.
- **We do not tolerate discrimination, harassment or inappropriate treatment** in any situation.
- **We work fairly and safely** – forced labour, human trafficking and child labour are strictly prohibited.
- **We comply with international principles** such as the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines and the ILO's principles on working life.
- **Every employee has the right** to a safe working environment, fair treatment and equal opportunities.

Remember: Treat everyone fairly and with respect. Never participate in activities that violate human rights. Let's work together to create a safe working environment where we are all equal.

Work

The Verman Group is committed to fair and responsible employment practices. We only employ people who are legally entitled to work. Respecting the rights of every employee is a principle we will not compromise on.

For us, this means:

- **Our working hours comply with local laws and collective agreements**. Reasonable working hours are everyone's right.
- **Every employee has a written employment contract** that clearly and legally defines the terms and conditions of employment. Employees are provided with understandable information about the terms and conditions before the start of their employment.
- **Salaries and benefits are paid in accordance with applicable laws**, regulations and collective agreements.
- **Children below the legal working age (usually 15 years) may not be employed** directly or indirectly. The employment of young workers is only permitted if their well-being is ensured and they receive appropriate training and remuneration. Only exceptions recognised by the International Labour Organisation (ILO) may be permitted, and in these situations, special caution and care must be exercised.
- **We support work-life balance** and promote the well-being of our staff.
- **Every employee has the right to participate** in collective bargaining (e.g. change negotiations) and to organise.

Remember: Always follow fair employment practices. Ensure that terms and conditions of employment are clear and lawful and that working hours are reasonable. Support well-being and work-life balance.

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Health and safety at work

The Verman Group provides a safe and healthy working environment for all its employees. We always comply with applicable occupational safety laws and regulations and ensure that the working environment supports well-being.

We ensure a safe working environment by adhering to the following principles:

- **Physical assault**, corporal punishment, threats of physical abuse, sexual or other harassment, verbal abuse or threats are **strictly prohibited**.
- **We implement appropriate measures** to prevent accidents, injuries and work-related illnesses. We have plans and measures in place for emergency situations.
- **Work tools and machinery must be intact**, safe and properly maintained.
- **Employees have access to the necessary protective equipment and gear** to enable them to work safely in all tasks.
- **Safety concerns are addressed immediately** and can be reported confidentially.
- **We regularly organise occupational health and safety training** for all employees.

Remember: Safety is a shared responsibility. Follow the instructions given and use the tools correctly. Report any risks you notice immediately and ensure that the working environment remains safe for everyone.

Non-discrimination and inclusion

The Verman Group respects every individual's right to equal and fair treatment. We do not accept any form of discrimination in any situation.

This is how we implement non-discrimination in the workplace:

- **No one may be discriminated against** on the basis of gender, religion, race, ethnic background, cultural heritage, social group, disability or illness, sexual orientation, marital status, age, political opinion or trade union membership.
- **We pay particular attention** to ensuring that the rights of vulnerable groups are realised.
- **We promote a working environment** where everyone has the opportunity to participate, develop and be treated with respect.
- **We have appointed an occupational safety and health committee** responsible for implementing measures to promote equality.
- **Harassment, bullying and other inappropriate behaviour must be actively prevented**. All reports of harassment will be investigated appropriately and responded to without delay.

Remember: Treat everyone fairly and with respect. Never tolerate discrimination or harassment. Let's work together to create a working environment where everyone feels valued.

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Environmental and social responsibility

The Verman Group operates responsibly for the benefit of both the environment and society. Every employee is part of this responsibility, and even small actions make a difference.

Environmental responsibility – what can you do?

- **Save energy and materials:** Switch off equipment when you are not using it and avoid unnecessary consumption.
- **Recycle and reuse:** Sort your waste correctly and take advantage of recycling opportunities. Avoid waste.
- **Choose environmentally friendly solutions:** Choose renewable energy sources and avoid fossil fuels whenever possible.
- **Ensure the safe use of chemicals:** Follow instructions and avoid unnecessary use.
- **Develop and suggest improvements:** If you notice a way to reduce environmental impact, bring up the idea.
- **Also remember to use water responsibly**: Use water sparingly and only when necessary.

Social responsibility – how can you make a difference?

- **Respect all communities and cultures:** Act fairly and value diversity.
- **Promote equality and fairness:** Treat all stakeholders equally.
- **Support local expertise:** Participate in training and share your own expertise.
- **Be open and transparent**: Be honest about how your work affects the environment and the community.
- **Engage in dialogue:** Raise concerns and suggest solutions.

Remember: Make everyday choices that support sustainable development – save energy, recycle and avoid unnecessary consumption. Respect communities and always act fairly and responsibly. Make everyday decisions that you can be proud of.

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Product safety and quality

The Verman Group ensures that all our products are safe and of high quality – this is a key part of our responsibility. Every employee's actions contribute to ensuring that our products meet the most stringent requirements.

To guarantee product safety, we adhere to the following principles:

- **All products must comply with legal requirements** and applicable product safety standards.
- **We always operate in such a way that food safety and nutritional quality are ensured** in all processes.
- **In Finland, our factories are certified according to the BRC and FSSC22000 food safety standards.** The compliance of our operations is regularly audited by authorities, certification bodies and our partners.
- **We ensure** that our production processes, raw materials and end products meet all applicable safety and quality requirements.
- **We ensure** that our suppliers meet the GFSI food safety criteria.
- **Documentation and traceability are always in order** – we know where our raw materials come from and how our products are manufactured.

Remember: Every employee is responsible for ensuring the safety and quality of our products at every stage of the work process. Product safety and quality are part of our company's reputation and the trust of our customers, which we earn every day.

Responsible procurement

Responsible sourcing is an integral part of Verman's operations. Our goal is to ensure that all products and services are sourced ethically, with respect for the environment and in accordance with laws and regulations. Responsible procurement means that we take into account the impact of the entire supply chain – human rights, working conditions, environmental impact and business integrity.

This is how we operate:

- **We make procurement decisions transparently** and honestly.
- **We do not accept corruption, bribery or unethical practices** at any stage of the procurement chain.
- **We select** suppliers who adhere to Verman's values and ethical principles.
- **We ensure that suppliers respect human rights** and provide safe working conditions.
- **We require our suppliers to operate in an environmentally responsible manner.** We take the protection of forests and waterways into account in our procurement. We do not procure raw materials that have caused deforestation.
- **We regularly monitor and evaluate** our suppliers' activities and continuously develop our cooperation.

Remember: Every purchase is an opportunity to promote responsibility. When choosing partners, make sure they share our values and are committed to our ethical principles.

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External communications, assets and brand protection

The Verman Group's external communications, company assets and brands are key components of the company's identity and reputation. Every employee influences how Verman is perceived externally, which is why our communications and actions must be responsible, considered and in line with our values.

We always adhere to the following principles:

- **We communicate externally in a professional and truthful manner** – including on social media and when acting as private individuals.
- **We do not comment publicly on Verman's affairs without authorisation** – external communication is the responsibility of the agreed parties.
- **Company property, such as work tools, systems and information, is used only for work purposes.** We ensure that it is used appropriately and protected.
- **We protect Verman's brands and products** – we use brand materials in accordance with instructions and do not share confidential information with outsiders.
- **We do not copy, share or use material produced by others without permission.** We respect copyrights and ensure that all content we use is authorised and in the company's best interests.

Remember: Your communications can affect how our company is perceived externally. Use your judgement and act responsibly. Our brands are valuable and protecting them is everyone's responsibility. Please take care of the company's property as if it were your own.

Information security and privacy

Protecting data is everyone's responsibility. Verman's information security and data protection are based on three fundamental principles: confidentiality, integrity and availability. This ensures that data remains secure and accessible only to those who are authorised to access it.

What does this mean in practice?

- **Passwords:** Do not share your passwords with anyone. Use strong passwords and change them regularly. Do not store your passwords in a visible place.
- **Devices and files:** Always lock your computer when you leave your workstation. Do not leave confidential documents visible. Remember this when working remotely as well.
- **Confidential information:** Do not copy, share or store confidential company information on personal devices or cloud services. All information must be processed only on systems approved by the company.
- **Data breaches:** If you suspect a data leak, lost device or misuse, report it immediately to IT support.
- **GDPR and data protection laws:** All personal data processing is carried out in accordance with the EU General Data Protection Regulation. Do not collect or process personal data without a clear basis and permission.

Remember: Every employee is responsible for data security. One careless act can jeopardise the company's reputation and customer trust.

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Reporting irregularities and concerns

Any inappropriate behaviour, misconduct or violations of the Code of Conduct must be reported immediately. Every employee has the right and obligation to raise concerns safely and confidentially. Reports can be made anonymously, and the reporter will be protected from retaliation – openness and safety are of paramount importance to us.

What this means in practice:

- **Report** any inappropriate behaviour, misconduct or violations of the Code of Conduct **without delay**.
- **You can report anonymously** – all reports are treated confidentially and seriously.
- **Reporters are protected** from retaliation and other consequences.
- **Use Verman's reporting channel** if you are unable to resolve the issue with your supervisor or HR.

You can report your concerns through Verman's confidential reporting channel:

🔗 https://www.firstwhistle.fi/verman##

Remember: Reporting is not about causing problems, but about solving them. Every report helps us maintain a safe and responsible working environment. You have the right to remain anonymous and the duty to act when you notice something wrong.

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