

# MARTELA CORPORATE CODE OF CONDUCT

Approved by Martela's Board of Directors on 7 November 2024

The Martela logo consists of the word "Martela" in a white, sans-serif font, centered within a solid black square.

**The Martela Oyj Board of Directors and Management Team are committed to developing the company in a responsible, long-term way, in order to meet the expectations of owners, customers, employees and other stakeholders. Responsibility is part of our business strategy and means of competition. Through developing our management principles, models and performance indicators, we will create many new opportunities to also improve our financial results.**

The Martela Corporate Code of Conduct contains statements and instructions for future work situations, in order to avoid discrepancies and problems that may arise, as concerns the legality or responsibility of our actions. All our directors, employees and suppliers, and service providers collaborating with us shall be familiar with these principles and commit to implementing them.

These general principles are complemented by more detailed principles and guidelines where necessary. The principles can be found on our website at [www.martela.com/about-us/sustainability/corporate-responsibility](http://www.martela.com/about-us/sustainability/corporate-responsibility).

## MARTELA VALUES

Our company values are Together, Boldly, Listening and Caring.

These values reflect what we are, what is important to us and what we want to commit to. The values create a common foundation, and are what our operations are based on. Respect and trust for one another are at the heart of our culture. We are the forerunner in creating better working and learning environments. Listening is the key to understanding our customers' needs and our solutions support ecological choices and the circular economy.

## COMPLIANCE WITH LEGISLATION AND VOLUNTARY AGREEMENTS

In all our operations, we strictly comply with all laws and regulations related to us.

Since we operate in the international market, we also take into account international agreements, commitments and recommendations relevant to our operations. The most important of these are:

- UN Universal Declaration of Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- ILO Declaration on Fundamental Principles and Rights at Work and other relevant ILO Conventions

We are committed to the UN Global Compact initiative, which aims to promote human rights, labour rights, environmental protection and the eradication of corruption and bribery. We belong to the Global Compact local network and report our actions annually.

Each of us must know the key laws, regulations and agreements concerning our own work. Supervisors are responsible for the required training and for monitoring compliance.

### *Corporate Governance*

As a listed company, we comply with the Finnish Corporate Governance Code, published by the Securities Market Association. The code is part of the Stock Exchange self-regulation, complementing the statutory administrative procedures. It aims to unify the practices of listed companies and the information given to shareholders and other investors, and to increase transparency.

#### Martela Group

phone	+358 (0)10 345 50
address	Miestentie 1, FI-02150 ESPOO
internet	<a href="http://www.martela.com">www.martela.com</a>

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## *Insider rules*

Martela follows the insider rules of NASDAQ Helsinki Oy. In addition, we have established our own more stringent insider rules.

## **FINANCIAL RESPONSIBILITY**

### *Management of assets*

We ensure that we manage our assets meticulously according to the rules and regulations. We take good care of our assets – both tangible and intangible – and we do not use them for unauthorised purposes.

Knowing the identity of our clients and others with whom we do business, and adhering to applicable standards on anti-money laundering. We do not conduct any activities in breach of applicable economic sanctions or undertake services which assist clients in breaching applicable sanctions laws. Where we suspect criminal behavior, we take appropriate action.

### *Information security and safeguarding confidential information*

We protect all confidential material, be it our own or entrusted to us by our business partners. We ensure data security with the data security expertise and responsible actions of those handling the data. We monitor information security threats and deviations and initiate the necessary measures. We use information security management system to manage data security risks.

### *Conflicts of interest*

In our work we may face situations where our company interests and personal interests could conflict with each other. As we work for our company, we shall never put our personal gain before the company's interests. Employees who are related, in a civil partnership or dating or in a similar relationship should not be in a position in the organisation where one is reporting to the other.

We shall not be involved, directly or indirectly, in activities competing with Martela, nor in business activities of a party in a business relationship with Martela.

### *Bribery and corruption*

We shall neither give nor receive bribes, in order to launch or promote our business. We do not advise, incite or entice anyone to accept or offer bribes through third parties or directly.

We do not offer nor accept any such gifts or hospitality that might influence our decision-making in business relations and that could be viewed as going beyond the conventional limits of hospitality. Our donations and other financial support, such as sponsorship, shall be in line with our Code of Conduct and back our responsibility goals. Our support shall not include personal interests conflicting with our company interests. We will disclose our donation and sponsorship activities in our annual Sustainability Report.

We do not support political parties, organisations or individual candidates.

## **SOCIAL RESPONSIBILITY**

### *Human rights and labour rights*

In our own employment, we always comply with the national laws, ILO conventions and the labour rights contained in the Human Rights Declaration, and expect the same from our suppliers of goods and services. We apply a risk assessment procedure to ensure social responsibility of our supply chain.

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We have described the procedure in more detail in the 'Sustainability Policy for the Supply Chain' document.

## *Relationships with employees*

Our success is based on ensuring that our employees are skilled and motivated and enjoy their work. Through responsible human resources management, we can be sure that these success factors are maintained in both the short and long term. Our style of leadership is responsible and target-oriented and respects individuals.

Our work community is based on equal opportunities and fairness, and we do not accept discrimination. We invest in wellbeing at work, job satisfaction and occupational safety as well as in maintaining and developing supervisor skills. We encourage our employees to take initiative and actively develop their competencies to increase their work skills.

We do not accept any inappropriate behaviour, unwanted gestures, inappropriate language, inappropriate physical contact, violent behaviour or threats of violence in our organisation. Any such behaviour shall always be investigated, and immediate action shall be taken. Everyone has the right to work in peace and in a safe working environment.

We encourage employees to always notify their supervisor without delay of any issues related to carrying out work in order to resolve any conflicts of interest. The notification can also be made anonymously, if preferred using the whistleblowing channels provided by Martela.

We appreciate cooperation with employee representatives in developing human resource issues. Every Martela employee is responsible for promoting a high-quality work community.

We manage our work on safety through an ISO 45001-certified occupational health & safety management system to ensure zero accidents and fluent processes in our work and report our performance annually. We promote our employees' and our material and component suppliers' understanding of safe working methods and we expect responsible work safety management from our supply chain.

## **ENVIRONMENTAL RESPONSIBILITY**

The management of environmental impacts is part of our daily work at Martela, and working in an environmentally sustainable way is the responsibility of everyone working for Martela. We strive to mitigate climate change and promote sustainable use of natural resources in all our operations.

According to our environmental policy, we are committed to offering our clients flexible and long-lasting workplaces that secure a good working environment with as low lifetime environmental impacts as possible. We improve our processes so that we can reduce energy use, emissions and environmental risks. Our products are designed based on a long lifetime and recyclability. We reduce the environmental load of workplace life cycles by providing products and services based on the circular economy to our customers.

We manage our environmental work through an ISO 14001 certified management system and report our performance annually. We promote the environmental awareness of our employees and our material and component suppliers. We expect responsible environmental management from our supply chain.

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## COOPERATION WITH SUPPLIERS AND SERVICE PROVIDERS

Our business is based on close partnerships with key suppliers and service providers. Since we require our suppliers to comply with the laws and regulations as well as with our own Code of Conduct, it is important that we introduce our principles to them and monitor their implementation in practice. We describe our requirements for supplier selection and co-operation in more detail in our Sustainability Policy for the Supply Chain, complemented by social responsibility compliance procedures based on a risk assessment scheme and environmental requirements affecting selected products. The selection of suppliers shall not be affected by personal preferences.

## CUSTOMER RELATIONS

Martela Lifecycle is based on close and long-term customer relationships through specification, planning, implementing and maintaining customer workplaces. We plan workplaces that are flexible and can be modified to support the changing needs of the customer. We monitor our customers' experience on a regular basis and get feedback on our products and services and we take the data received into account when developing our operations and offerings.

We train our own and our partners' personnel to improve and maintain our customer service, especially regarding workplace, product and environmental expertise. We have described our sales process, and we operate according to it. We maintain and share information and documentation in a customer information management system.

We carry out regular feedback discussions with our key customers on our operations, our products as well as our quality and environmental management. We support our customers in their responsibility goals by helping them in the more efficient use of space. We also help our customers improve their employee wellbeing by providing them with workplaces that support the employee needs in an optimal way. We provide interior solutions with a minimal environmental impact as well as re-using, refurbishing and recycling existing furniture.

We manage our continuous improvement through an ISO 9001 certified quality management system and report our performance annually. We promote the understanding of customer needs of our employees and our material and component suppliers. We expect quality management also from our supply chains.

## CONFIDENTIALITY OF CUSTOMER INFORMATION AND OTHER PERSONAL DATA

At Martela, we comply with best practices in processing and protecting personal data as well as legislation in each country. By correctly processing personal data, we maintain customer trust and improve the efficiency of our operations. We plan the processing of personal data in advance and only collect data necessary for the purpose of use in the personal register.

We ensure that the information in the personal register is correct and that there is no risk to the data subject's privacy from processing it. We inform the data subjects about the register and that they have the right to review the information about themselves. Personal data processors may not disclose personal data they have received to others without legal bases. The authorities will only be given such information for which they have a legal right. Any suspicion on misuse of personal data can be notified by using Martela's whistleblowing channels or by notification to [gdpr@martela.com](mailto:gdpr@martela.com).

## COMMUNICATIONS AND STAKEHOLDER RELATIONS

We communicate our objectives and activities openly to our stakeholder groups in accordance with laws, official regulations and stock exchange rules. We report on our sustainability issues on a regular

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basis on our website as well as in our annual Sustainability Report, compiled according to the Global Reporting Initiative recommendations.

We compete fairly. We gather competitive information legally and through ethical means, never through deception, dishonesty or theft. We never use misrepresentation or abuse confidential information to gain an unfair advantage over our competitors.

As Martela is a listed company, we are obliged to consider insider regulations and confidential business secrets which we may not disclose. Our media relations are handled by appointed individuals. Personnel should always help the media to get in touch with the right person or ask their supervisor to help contact the right person. Martela's personnel shall never act in a way that could damage Martela's reputation or competitive success.

We actively participate in developing our branch of industry, as well as in environmental protection and development aid projects that support our goals.

## NOTIFICATION ABOUT BREACHES CONCERNING FINANCIAL MARKETS

Persons working at Martela and other stakeholders of Martela can report alleged infringements of the rules and regulations governing the financial markets, including infringements against the company and of Nasdaq Helsinki Oy's insider guidelines, through an independent channel. The notification (anonymously, if desired) is made in an informal letter to Whistleblowing, Martela Oyj, Miestentie 1, 02150 Espoo, Finland an informal email to [whistleblowing@martela.com](mailto:whistleblowing@martela.com) or through Martela's whistleblowing channel on Martela's website.

Martela ensures the protection of the notifier in such a way that the notifier will not be subject to discrimination or other inappropriate action due to the notification. The handling of notifications is properly organised and the personal data of the notifier and the person about whom the notification has been made are protected in accordance with the Personal Data Act (523/1999). The identities of the notifier and the person about whom the notification has been made will be kept confidential, unless investigation of the offence or the right of the authorities to obtain the information is otherwise determined by law. Access to the notification and the personal data of the notifier and the person about whom the notification has been made is limited to those persons to whom such information is indispensable in order to investigate the case.

Martela stores the necessary information for such declarations in accordance with the Securities Markets Act (746/2012) for five years following the notification, unless further storage of data is necessary for criminal investigations, legal proceedings, regulatory investigation or to safeguard the rights of the notifier and the person about whom the notification has been made. Any need for continued storage is reviewed no later than three years after the previous revision. An entry is made of the review.

The rights of the notifier are defined in the Personal Data Act. In addition to the rights stipulated in the Personal Data Act, the notifier has no inspection right to the data provided if such disclosure could undermine the investigation of suspected infringements.

## EXECUTION OF THE PRINCIPLES

Supervisors are required to familiarise current and new employees with the principles. Procurement officers are responsible for introducing them to our suppliers of goods and services. The management

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will monitor compliance with the principles, for example through internal audits and evaluation of suppliers and service providers.

Employees shall contact their supervisors, managers or other appropriate personnel whenever interpretation of or compliance with the principles is unclear. Any breach of the principles shall be immediately reported to their supervisor. Alleged infringements of the rules and regulations governing the financial markets, including infringements against the Company and of Nasdaq Helsinki Oy's insider guidelines, are to be reported as explained above. The responsibility of investigation and possible follow-up measures lies with the CFO, Sustainability and Human Resources representatives and, if needed, the management. There will be no negative consequences for the informer of the breach.

Procedures that conflict with the principles must be corrected without delay. In case of serious offences, immediate measures will be taken, which may even lead to termination of employment.

Martela's Sustainability Policy for the Supply Chain includes the corresponding actions for supplier follow-up and measures in case of violations.

## UPDATING

Martela's Board of Directors approved this updated Corporate Code of Conduct on 7 November 2024. The principles are assessed annually, so that they correspond to the valid regulations and company objectives.

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