



Heino Code of Conduct

Objective and purpose

The objective and purpose of the Code of Conduct is to ensure that all TukkuHeino Oy companies operate in an ethical manner and successfully manage their relationships with customers, suppliers, authorities and competitors.

Cornerstones of our operations

Our daily operations are guided by Heino values and ethical operating principles.

Work profitably - A strong financial result and high operational quality ensure long-term company growth.

Learn and grow - We want to help the customer succeed. We want to approach development with an open mind and renew our operations every day. We have the ability to change.

Appreciate and be fair - We appreciate people, showing them respect and caring for them. The spirit of Heino obligates each and every one of us to contribute to our success.

Be responsible - We do things honestly and responsibly, from start to finish, and we always keep our promises.

Our operations are governed by the principles set out in the certified ISO 9001 quality management system. We set clearly defined goals toward achieving our strategic objectives and monitor the impact of our actions. We constantly listen to and gather feedback from our key stakeholders, such as the expectations of our customers and employees, and develop our operations based on them. Continuous improvement effectively guides our company and personnel toward achieving goals that generate added value, also for our customers.

We comply with laws, statutes and regulations in every aspect of our operations. In addition to this, we honour each and every agreement we make and follow the industry's best practices. Working in co-operation with other industry actors, we ensure compliance with competition and anti-monopoly legislation.

We honour the principles of sustainable development as well as international initiatives and conventions concerning human rights and the fundamental principles of labour and labour rights. Our responsible operating approach concerns not only our own business, but also procurement at the start of the supply chain.

Business relations

We are an honest, reliable and fair partner.

In business relations, we want to work in co-operation with reliable suppliers, customers and other partners, each of which has pledged to operate in an ethical manner and comply with all laws and regulations.

Business-related events which we host or participate in directly involve our actual business and the hospitality we receive or provide is reasonable. We do not accept or offer any personal financial or other benefits.



We never use information on business operations, group suppliers or customers for our own benefit. This also applies to any conflicts of interest when employees come into contact with people who might have an influence on their ability to make decisions in the interests of Heino.

Personnel and safety

We are a reliable employer, which treats its employees fairly and equally and provides a safe working environment.

All employees have the opportunity to work in a positive and motivating atmosphere. Employees and supervisors are each responsible for promoting well-being by encouraging and supporting their co-workers. All employees are entitled to good management and proper treatment by their superiors, subordinates and co-workers, thus ensuring the best possible working conditions.

We appreciate and respect each individual and their differences. We absolutely reject any form of discrimination or bullying based on race, skin colour, religion, gender, sexual orientation, nationality, age or any other reason. We absolutely forbid improper behaviour, harassment or bullying in any way, shape or form.

We ensure that our employees possess the right knowledge and skills, and develop them continuously. We ensure that our employees and our subcontractor employees receive training and guidance, and we keep our operational guidelines up to date.

Occupational safety is vital to employee well-being. Managing occupational health and safety risks is based on continuous improvement and a preventive approach to operations. All personnel are responsible for compliance with set guidelines and the reporting of safety observations. Our operating approach is based on the certified OHSAS 18001 occupational health and safety management system.

Environmental responsibility

We assume responsibility for the environmental impacts of our operations.

We pledge to protect the environment and mitigate climate change by increasing positive environmental impacts and decreasing negative ones throughout our entire supply chain. Our key objectives include improving the efficiency of our energy consumption and increasing the percentage of renewable energy sources in our facilities and transports, reducing the amount of waste generated, increasing the level of recycling, and promoting the sale of environmentally friendly products. Our environmental work is based on the requirements set out in the certified ISO 14001 environmental management system and ETJ+ Energy Efficiency System.

Responsible supply chain

When making procurement decisions, we favour the use of products and services that comply with the principles of sustainable development

We identify factors that pose a risk to food safety and manage their control and prevention. Clearly-defined and common operating practices, risk management of the manufacturing process and effective in-house control all play a key role in this. Based on certified food safety systems as well as fish and shellfish traceability systems (ISO22000, FSSC22000, MSC and ASC), our operations provide safe, high-quality products for our customers.

We use responsibly farmed or caught fish in our products. We favour the use of certified sustainable palm oil and responsible soy in our own brands. Furthermore, our policies



include requirements ensuring the well-being of animals, limiting the number of products containing GMOs, reducing the use of plastic and prohibiting the use of azo dyes.

We comply with and require that our partners comply with the amfori BCSI Code of Conduct, which is based on internationally recognised conventions and declarations, such as the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

- Workers have *the right to organise* and join trade unions as well as engage in collective bargaining.
- Workers have the right to be treated equally and all forms of *discrimination are expressly prohibited*.
- Workers have the right to receive *fair remuneration* that is sufficient to provide them with a decent living for themselves and their families.
- *Working hours must be reasonable*, they must be in accordance with national legislation and cannot exceed 48 hours in a regular working week.
- The *health and safety* of all workers must be safeguarded.
- *No work may be performed by children*.
- *Young employees must be given special protection* from working conditions that may pose a risk to their health, safety, morals or development.
- *Precarious employment is prohibited*. Work is performed on the basis of a recognised and documented employment relationship, which complies with national laws and practices as well as international conventions.
- *Employment shall not be based on forced labour*, servitude, slavery, debt bondage, the illegal labour market or any other form of involuntary work.

Co-operation and communications

We operate openly and on a customer-specific basis, striving to achieve a dialogue that promotes co-operation.

We present information on our products and services clearly and truthfully in our sales and marketing. Our responsibility work is transparent and we report on it to internal and external stakeholders regularly and in accordance with agreed practices.

Responsibilities and obligations

All Heino employees are responsible for complying with this Code of Conduct.

Company management is responsible for actively conveying our values and principles, according to which we expect all employees to act.

All employees are obligated to protect all assets, property and information belonging to the company. We only collect personal data for certain prescribed purposes and its processing is always transparent where the data subject is concerned.

Each and every employee is obligated to act in accordance with this Code of Conduct and notify the group of any violation of the ethical guidelines. Violations must be reported to the immediate supervisor, the managing director of the company in question or the personnel director of TukkuHeino Oy.

The Heino Group Board of Directors approved this Code of Conduct in March 2019