

January 2022

# **Lunawood Third Party Code of Conduct**

#### CEO's foreword

Corporate responsibility is playing an increasingly important role in the day-to-day business of companies around the world, and Lunawood is no exception. We have developed our corporate responsibility work holistically, taking the entire supply chain into account. This is important to us because we want to be able to continue to say that our products are sustainable. We want to work with our partners so that we can be sure we are acting sustainably in every area.

We have prepared a Third Party Code of Conduct that is also consistent with our Code of Conduct. We have done this because it is important that our partners adhere to the basic principles that are imperative to us. In this way, we are able to ensure that the products our customers receive have been produced and delivered sustainably.

Let us move forwards together sustainably.

Arto Halonen CEO, Oy Lunawood Ltd

#### **Lunawood - Love for the Forest**

Lunawood has systematically developed its corporate responsibility work over the past year. Our company constantly works hard to achieve sustainability. Sustainability is at our core. Sustainability runs through the entire supply chain, from the sourcing of raw material to our end-users. We want to be a sustainable pioneer in the production of Thermowood. We truly believe that we can reconnect nature and the urban environment. We act in accordance with our values everywhere – happily, sustainably and achieving results together.

This Third Party Code of Conduct is based on the ten principles of the United Nations Global Compact Initiative, which are based on the following universal pillars:

- The United Nations Guiding Principles on Business and Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The United Nations Conference on the Environment and Development, Rio Declaration 1992
- The United Nations Convention against Corruption

At Lunawood, we are fully committed to these principles. We also follow the EU Timber Regulation, which works against the illegal harvesting of timber or timber products.



We also expect our suppliers, customers, and partners to comply with these principles. We will prioritise suppliers and customers who follow our Third Party Code of Conduct and share our values.

We will monitor these terms and conditions. If you break our Third Party Code of Conduct, our cooperation may be terminated.

### 1. Our behaviour is open and transparent

At Lunawood, all employees and suppliers receive fair and equal treatment according to the principles of the Universal Declaration of Human Rights and local legislation. We do not tolerate any kind of harassment, threats, discrimination or abuse at or outside the workplace, including on social media. We expect our partners and suppliers to respect human rights and equal rights between genders. We intervene without delay on these issues.

Anyone in our interest groups can contact us anonymously and report incidents that involve a suspected breach of our Third Party Code of Conduct.

Lunawood has a whistleblowing system, where you can report your suspicions anonymously without fear of countermeasures or negative consequences. The ethics hotline and related instructions are available on Lunawood's website. All incidents reported in good faith are investigated impartially and confidentially, respecting the level of anonymity chosen by the reporter.

#### In practice

We do not accept any unequal treatment, harassment, abuse or child labour.

We do not accept discrimination between genders.

For any issues of concern, we have a whistleblowing system available.



## 2. We foster safety at work

Safety at work and good working conditions are important to us. Safety arises from the right kind of attitude and a safety-oriented approach. We develop safety together, intervene in hazardous situations and strive to minimise work-related risks.

Everybody working at or visiting Lunawood is required to observe the safety instructions, wear the required protective clothing and equipment, and notify appropriate supervisors of any issues that are detected. All hazards must be taken into consideration before starting work and instructions must be observed.

## In practice

Safety observations are made by staff and everyone who visits Lunawood. Safety instructions must be followed, and we work to achieve a safe working environment for everyone.

Protective clothing must be worn in mill sites and instructions need to be followed.



#### 3. We care for the environment

Lunawood's products are made in a responsible manner from high-quality PECF-certified raw materials. We ensure high quality and a long lifespan for our products. We regularly monitor our environmental impact, and we are committed to continuous improvement and the principles of our environmental system.

We train our employees to recognise environmental impacts and ways to reduce them in various work tasks. We also train our cooperating partners and customers in the correct use and maintenance of our products to ensure their long service life.

## In practice

We take care of environmental aspects.

We buy Nordic certified wood.

We require sustainable forestry management at the sawmills from which we purchase the raw material.



### 4. We act openly and fairly

We are committed to complying with the applicable Competition Act in all we do. Our operation in the market is based on open competition. We adhere to competition legislation.

Neither Lunawood nor its employees are allowed to give or accept any direct or indirect gifts or other benefits that may be considered bribes or other forms of corruption. We do not pay or promise to pay bribes or illegal payments to authorities or other parties, or encourage, incite or urge anyone to do so. Those working at Lunawood are expected to avoid situations that may conflict or that can be considered to conflict with their personal and business-related interests.

When dealing with partners, customers or suppliers, documentation must be accurate and describe the transaction truthfully and honestly. We expect our partners and interest groups to operate accordingly, and on the basis of similar values.

At Lunawood, we do not approve of money laundering and do our best to prevent it. We only do business with customers and partners with a good reputation and who are engaged in legal business activities. We strive to build long-lasting partnerships and to carefully investigate our customers' and partners' backgrounds.

Lunawood is a valuable brand that combines responsibility, quality and adherence to our values. Business gifts and hospitality are compliments designed to build goodwill between business partners. However, it is important that these compliments do not compromise – or even appear to compromise – our ability to make fair business decisions. We can give or accept a personal gift if it is of small monetary value. The same goes for business hospitality.

## In practice

The value of gifts given to our clients or those we receive should not exceed €100.

Bribes are not part of our business culture.

We have legally regulated accounting.



# 5. Data security

All Lunawood's employees are expected to keep all confidential information secret regarding the company's activities, personnel, customers and partners. Confidential information is handled in accordance with laws and regulations. Lunawood's IT connections are constantly updated and monitored so that we can protect our data against potential data leaks or cyber-attacks.

## In practice

Our customer relationships are confidential. We also keep customer relationship information confidential.

We are a trustworthy partner.

We honour long-term business relationships.