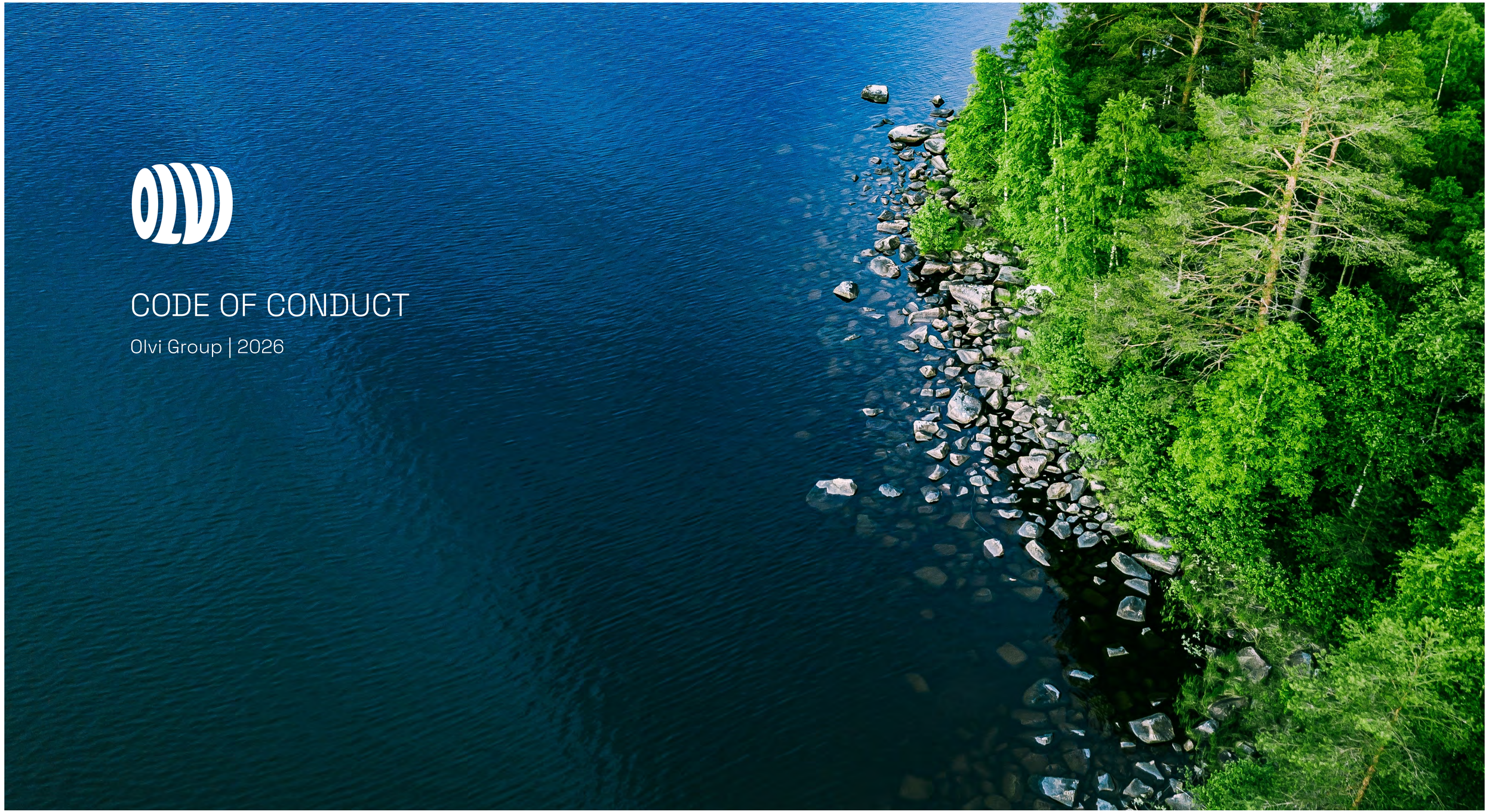
CODE OF CONDUCT

Olvi Group | 2026



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CEO’S FOREWORD

Dear Olvi Group employees and partners of Olvi Group, Olvi is an international brewery in Finnish ownership. It is composed of the parent company Olvi and its subsidiaries – A. Le Coq in Estonia, Cēsu Alus in Latvia, Volfas Engelman in Lithuania, Lidskoe Pivo in Belarus, Bryggeriet Vestfyen in Denmark, Banjalučka Pivara in Bosnia Herzegovina and Brewery International in Norway and Sweden, among others.

Olvi Group’s mission is to provide moments of enjoyment – with pride. This is based on our values: local, positive, respect, and agile. Ethical and sustainable ways of working are important to our values, and we are committed to fostering and promoting them as part of our daily business practices, in line with our ongoing development across all market areas.

We want to foster our reputation as a fair operator that conducts business with integrity in every Olvi Group company. We value our employees, business partners and other stakeholders, such as customers and consumers, and strive to treat everyone fairly. Transparent operations, as well as open and active communication within Olvi Group and with our stakeholders, help build trust in our business practices.

Sustainability and sustainable development are becoming increasingly important to our stakeholders and to consumers, in particular, when they make their daily product choices. We are committed to advancing sustainable business practices as part of our ongoing development and acknowledge their growing importance in respect of the growth and development of our operations.

We want to be an increasingly interesting investment target and an increasingly desirable beverage manufacturer to our stakeholders every day. We expect all employees and partners of Olvi Group comply with applicable law and regulations, as well as with our values and the Code of Conduct. By complying with our Code of Conduct, we aim to meet our customers’ needs even better than before, maintain our positive corporate culture, ensure the quality of our products and strengthen our commitment to our stakeholders.

Best regards,

Patrik Lundell



OLVI GROUP'S WAY OF WORKING

We are an international beverage group which operates in several countries and markets. Our aim is to advance sustainability in our sector by promoting responsible activities in our operations and throughout the value chain.

We want to be a reliable and stable partner for our employees and other stakeholders and help make responsible choices. We believe that transparency, honesty and consistency are key in building trust. Our goal is to establish long-lasting relationships, promote innovation and provide high-quality products that meet the expectations of our customers and consumers. We are committed to listening to our stakeholders and responding to their needs as part of our ongoing development.

Honest and fair ways of working are important to our values, and we are committed to fostering and promoting them as part of our business practices across our market areas. Olvi Group's Code of Conduct sets out key principles for our operations and corporate culture, guiding our approach to responsible activities. The Group's policies support compliance with the Code of Conduct.

The Code of Conduct applies to the Board of Directors, management, and employees in all Olvi Group companies, and we provide for them regular training for Code of Conduct. Commitment to complying with the Code of Conduct must be confirmed annually, and training must be completed every other year. In addition, we address the Code of Conduct in our communication and as part of our operating culture. We are proud of the skilled people in the employment of Olvi Group and expect them to promote the best practices of responsible and ethical conduct. Olvi Group deals with all activities in which people have been found to be in breach of law, Olvi Group's operating principles or guidelines, or this Code of Conduct, or to have authorised or permitted their subordinates to act in such manner. This may even result in the termination of the employment relationship.

This Code of Conduct provides the basis for the Code of Conduct for Partners, compliance with which we expect from our suppliers and partners.

OUR VALUES

LOCAL – We value local presence and manufacture our products for local consumers while still relying on the Group's strong support.
POSITIVE – A positive attitude is our way of operating and responding to challenges.
RESPECT – We respect each other, our customers, partners and the environment.
AGILE – We operate in an agile and customer-focused manner and develop our operations and product range dynamically on the basis of customer needs and data.

1 | WE COMPLY WITH APPLICABLE LAWS AND REGULATIONS

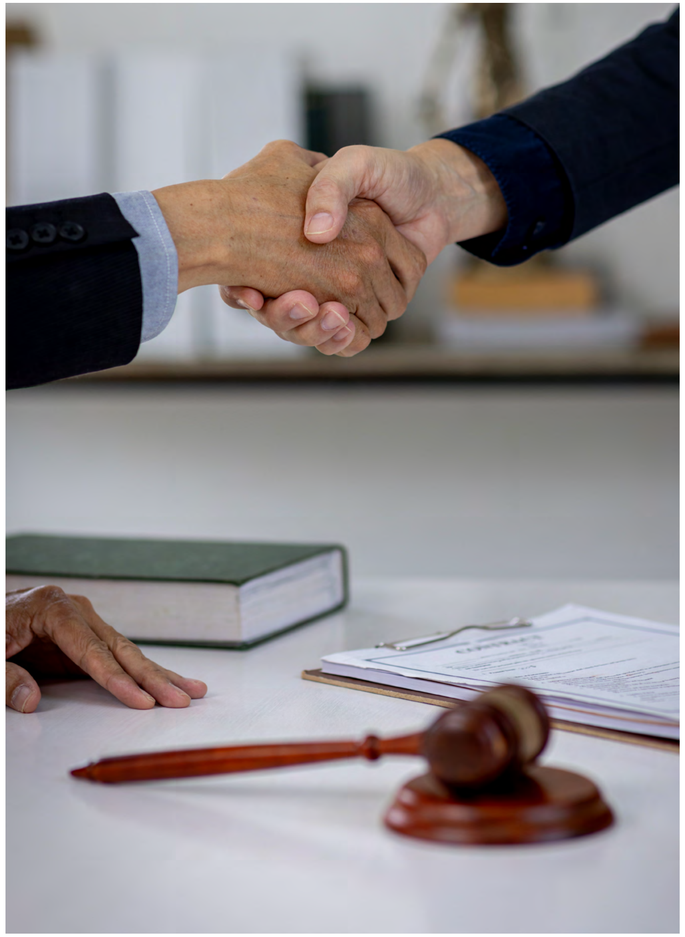
Compliance with laws and regulations is the first step in sustainable business. We comply with all applicable national and international laws and regulations. They form the basis of all our operating principles that guide the Group's employees to act correctly. Olvi Group is committed to respecting and promoting internationally recognised human rights and standards, including:

- The UN International Bill of Human Rights
- The UN Guiding Principles on Business and Human Rights
- The ILO's Declaration on Fundamental Principles and Rights at Work

As a Group located in the EU, we comply with all directly applicable EU regulations as well as national laws implemented on the basis of them. As a listed company, we are also obligated by special regulations on communication and good governance. Competition law regulates our operations and cooperation with stakeholders, including competitors, customers and other third parties.
In line with our ethical and transparent way of working, we require all Olvi Group employees to comply with anti-bribery and anti-corruption laws in all countries in which we operate. This also applies to all stakeholders with whom we interact.

We are committed to advancing sustainability in our business and value chain, taking ongoing measures to reduce our environmental footprint and promote responsible practices. Olvi Group complies with applicable laws and subsequent regulations on health, safety and the environment. In addition to law, Olvi Group is committed to complying with international commitments, initiatives and guidelines for sustainable and responsible business, including:

- The UN Global Compact principles that guide our work concerning human rights, labour rights and environmental protection, as well as the prevention of corruption
- The UN Sustainable Development Goals which we promote as part of our operations
- The OECD Guidelines for Multinational Enterprises
- The Paris Agreement



2 | WE PROTECT THE COMPANY'S TANGIBLE AND INTANGIBLE ASSETS

We have been entrusted with Olvi Group's assets because they generate value to the company and everyone who benefits from the success of Olvi Group. All of the company's assets may only be used for appropriate business purposes, and costs must be managed with care. The company's assets may only be borrowed, handed over to others, sold or conveyed with an authorisation to do so. The company's assets may be tangible, including funds, premises, hardware, software, tools and goods, or intangible, including trademarks, copyrights, business secrets, other intellectual property rights and employees' working hours.

We expect all employees to only use their working hours in tasks carried out for Olvi Group, excluding any exceptions agreed with supervisors. Olvi Group's employees may not benefit from or help third parties benefit from opportunities discovered through the company's information or a person's position in the company.

We are responsible for maintaining the confidentiality of any confidential information, or information falling under the proprietary rights of Group companies or business partners, that we have become aware of during the course of our work in the appropriate manner. The exposure of confidential information could result in serious losses for Olvi Group.

FURTHER INFORMATION:

- IPR (Intellectual Property Rights) Policy
- Data Protection Policy
- Information Security Policy



THIS IS HOW WE ACT

- We protect all documents and company equipment in our possession and handle them with care. Special caution must be exercised in public places.
- We use the company's hardware and email addresses for work-related purposes only.
- We understand Olvi Group's data protection and information security policies and comply with them.
- We share confidential information with our colleagues with deliberation and only share such information with people who require it in their work.
- We protect privacy and the confidentiality of personal data.

3 | WE AVOID CONFLICTS OF INTEREST BETWEEN OUR PRIVATE LIVES AND OUR WORK AT OLVI GROUP

During our relationship with Olvi Group, we may not undertake any activity that could result in a conflict between the interests of Olvi Group and our personal interests. Conflicts of interest may arise in all personal relations, and this may have an effect on a person's ability to act in the best interests of Olvi Group. We must also avoid situations that may seem to involve a conflict of interest from the perspective of an external party, because this may damage our credibility.



THIS IS HOW WE ACT

- We report our personal corporate ties in accordance with Olvi Group's guidelines. Usually, Olvi Group requires any personal ties to be reported and updating any changes when entering into the employment contract.
- We inform Olvi Group's management if a group company is about to undertake a business transaction with an employee's family member, relative or friend, or with another party with which the employee has personal interests. The business transaction must be approved by a supervisor, and the employee in question may not participate in decision making in any way.
- We avoid situations where fair and equal decision making may be compromised or from where personal benefits may be obtained.

4 | WE DO NOT ACCEPT BRIBERY OR CORRUPTION

The management, employees and partners of Olvi Group do not pay, offer, authorise or accept illegal or inappropriate payments or bribes to secure deals or retain business or for any other reason. The prohibition is valid regardless of whether the payment would be direct or received through a third party.

In a broader sense, corruption and bribery mean the illegal abuse of a position of power or one's own position for personal financial or some other gain, or for the benefit of a third party or Olvi Group. This means, for example, that an employee promises a financial benefit – such as a gift, entertainment or some other form of benefit – to an official or other party. It may also mean that an employee agrees to accept or accepts a promised financial or other benefit from a business partner or other party.

Greasing or facilitation payments are not permitted at Olvi Group. This refers to payments in cash or any other kind of benefit with monetary value given to an official with the aim of speeding up a process or carrying out a task which the payer would be legally entitled to even without the payment or the offer of a benefit.

We accept conventional gifts and hospitality in business operations, but the costs incurred may not be excessive. Conventional and appropriate promotional products and product samples are not considered gifts as such, but part of Olvi's business.

FURTHER INFORMATION:

- Anti-corruption Policy



THIS IS HOW WE ACT

- We only give and receive gifts of a reasonable value that are appropriate relative to the quality of the business relationship.
- We comply with Olvi Group's ways of working with regard to sponsorship agreements and contributions. We do not make promises on such matters before the approval of local Olvi Group company management.
- We retain any correspondence with the authorities in accordance with Olvi Group's practices and only meet the authorities accompanied by a colleague.
- We do not give or receive any cash or payment instruments as gifts.
- We do not pay or accept any fees that do not correspond to the service or material agreed or received.
- We do not allow third parties, customers or anyone else pay for our accommodation or travel expenses. This also applies to any corporate events we have been invited to.
- We do not grant any sponsorships or contributions to parties who lead us to believe that the sponsorship or contribution is necessary to secure a deal or maintain a business relationship.

5 | WE SUPPORT HEALTHY AND EFFECTIVE COMPETITION AND BUSINESS

Competition law regulates communication and cooperation with stakeholders, including competitors, customers, distributors and other third parties. We support healthy and effective competition and business between Olvi Group and its competitors. For example, Olvi Group may not take part in any agreements or operating methods meant to restrict competition between Olvi Group and its competitors. Furthermore, we do not abuse dominant market positions or participate in cartels in any respect.

Olvi Group promotes fair and open competition that encourages the development of the company's products and services, ultimately bringing increasingly better options available to customers. A violation of competition laws may result in lengthy official investigations and legal processes, fines imposed on Olvi Group, and even prison sentences for the employees involved – in addition to a significant and permanent loss of reputation.

FURTHER INFORMATION:

- Competition Law Policy

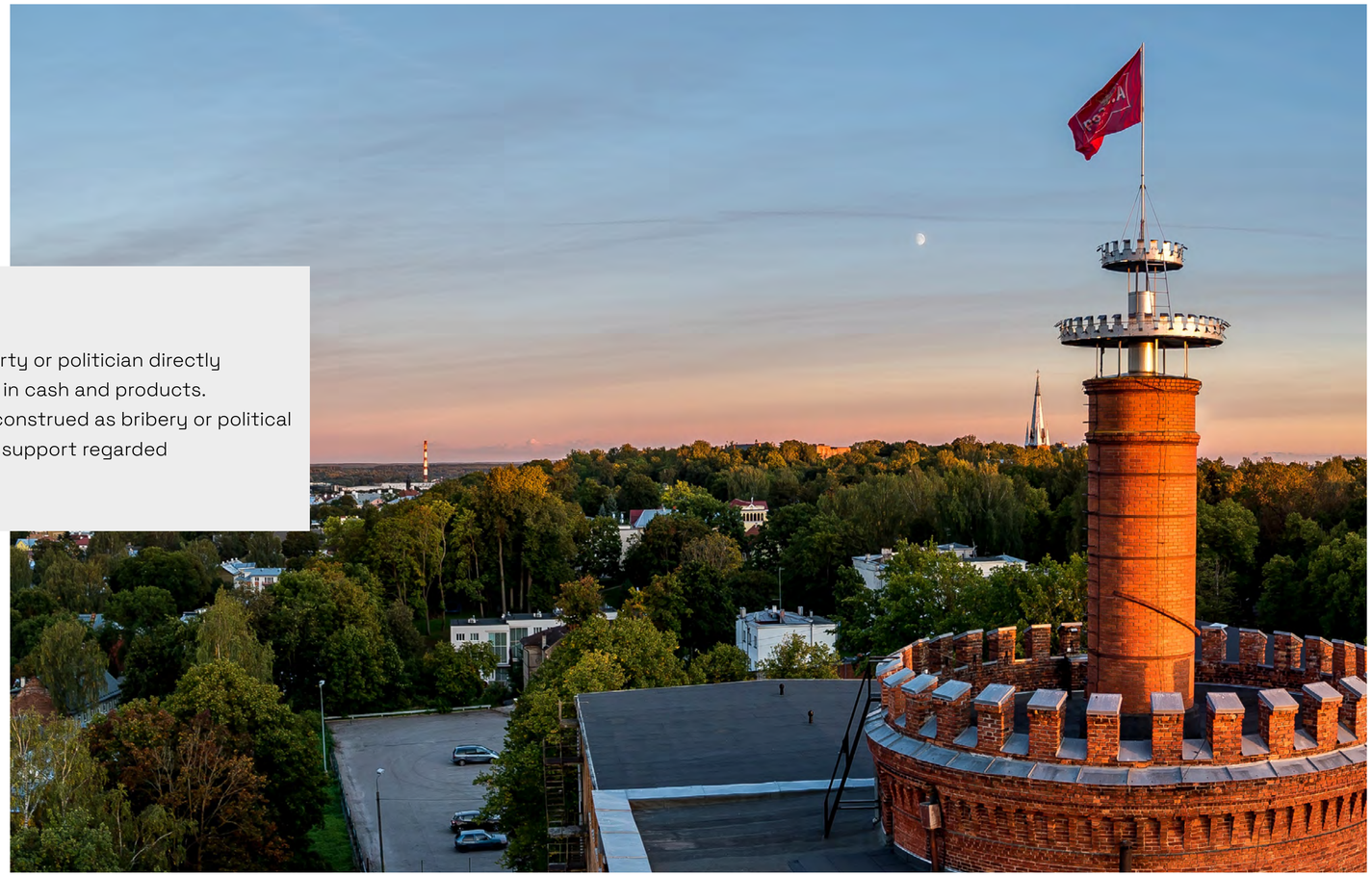


THIS IS HOW WE ACT

- We immediately interrupt discussions with a competitor and refuse any propositions made if the subject matter shifts to sensitive issues, such as prices. We report such incidents to our supervisor.
- We only collect information about our competitors by honest and legal means from sources available in the public domain.
- We familiarise ourselves with the applicable competition laws, and when necessary, turn to our supervisor for further information and instructions.
- We do not make agreements with competitors or partners, the purpose of which is to divide market shares, agree on prices or otherwise restrict healthy and effective competition.

6 | OLVI GROUP COMPANIES DO NOT ENGAGE IN POLITICS

We find an open dialogue in society important. Olvi Group's interests are mainly represented indirectly through industrial and trade associations. The funds of Olvi Group shall not be used to fund any particular political party or organisation. Nor may they be used to support any candidate to a political office or a state or municipal official, even if the local law would allow contributions. Olvi Group's Chief Executive Officer must pre-approve any support regarded as other than financial support.



THIS IS HOW WE ACT

- We do not give contributions to or sponsor any particular political party or politician directly or through related parties. This prohibition applies to both payments in cash and products.
- We do not give any other contributions or sponsoring that could be construed as bribery or political payments. Olvi Group's Chief Executive Officer must pre-approve any support regarded as other than financial support.

7 | WE COMMUNICATE HONESTLY, DILIGENTLY AND RESPECTFULLY WITH OUR STAKEHOLDERS

Olvi Group values the opinions of its stakeholders and engages in an open dialogue with them. Communication must be truthful and responsible in all relations with stakeholders. Our way of communicating has an impact on our image and reputation.

Marketing communications, emails, posts on social media and all company material must be drawn up diligently and with respect. Everything we say and do must reflect the values of Olvi Group and comply with this Code of Conduct. We must be particularly cautious and appropriate in our written communication, because written text may pose a serious risk to the company if it is drawn up carelessly or contains errors.

Olvi Group has named communication representatives with the right to represent the company in its name. Only these representatives have the right to answer any inquiries made by media services, give presentations to third parties and release information on social media in the company's name.

FURTHER INFORMATION:

- Marketing Policy
- Communications Policy
- Social Media Guidelines



THIS IS HOW WE ACT

- We do not present any personal opinions in the company's name on social media.
- We do not disclose any personal or sensitive information or information falling under the scope of a third party's proprietary rights, confidential or financial information pertaining to Olvi Group or any current or former employee, customer, supplier, shareholder or other stakeholder that they have become aware of during the course of their employment or cooperation relationship with Olvi Group. This also applies to stakeholders.
- We do not discuss any confidential matters outside the workplace in locations where they may be overheard by third parties.

8 | WE PROVIDE INVESTORS WITH UP-TO-DATE AND RELIABLE INFORMATION

We ensure the equal treatment of all investors by releasing financial information on time and to all stakeholders simultaneously. Olvi Group's managers and their related parties are subject to special requirements with regard to trade in Olvi Plc's shares and the processing of insider information. In addition, designated insiders must comply with insider guidelines. Insider information means information that has not been made public and that may have a material effect on the price of Olvi Plc's shares.

FURTHER INFORMATION:

- Olvi Group's Insider Guidelines

THIS IS HOW WE ACT

- We do not use insider information when trading in Olvi Plc's securities for personal gain or the advantage of anyone else.
- We do not disclose insider information or advise third parties, directly or indirectly, to trade in Olvi Plc's securities.



9 | WE RESPECT HUMAN RIGHTS AND PROVIDE EQUAL OPPORTUNITIES

We are committed to promoting human and labour rights, and we do not accept any violations of these rights. We address human rights in our operations and their development. We seek to prevent and mitigate our human rights impacts and remedy our adverse impacts on human rights, of which we become aware.

Olvi Group aims to develop the surrounding society and be an example of a positive and healthy workplace in all of its locations. We respect and support our personnel's professional freedom of association and right to organise. We do not accept forced or child labour or human trafficking.

At Olvi Group, everyone is treated equally and respectfully. Recruitment is based on task-specific competence and performance requirements. All employees and job applicants are given equal opportunities, regardless of age, gender, ethnic background, race, colour, sexual orientation, disability, political opinions or religious beliefs, or any other similar reason. This applies to all employment-related matters, including recruitment and promotions. We have zero tolerance for discrimination and harassment. We do not accept discrimination, harassment, inappropriate conduct or bullying – that is, behaviour that may give rise to feelings of fear, humiliation or hostility.

FURTHER INFORMATION:

- People Policy
- Human Rights Commitment



THIS IS HOW WE ACT

- We respect and promote human rights.
- We maintain a positive and supportive atmosphere.
- We do not give inappropriate feedback or make inappropriate jokes to colleagues, business partners or customers, because this type of behaviour is bullying.
- We do not discriminate, harass or be offensive due to age, gender, ethnic background, political opinions or any other reason.

10 | WE GIVE PRIORITY TO OUR PERSONNEL'S HEALTH AND SAFETY

Enthusiastic, skilled and motivated personnel are key to Olvi Group's business success. The safety, health and well-being of Olvi Group's employees is of paramount importance. We offer our employees, other people working in the company's facilities and those within our operations' sphere of influence a healthy and safe environment that improves work ability and well-being at work.

Olvi Group's personnel are responsible for protecting themselves and others by reporting all shortcomings related to health and safety. Early intervention is important in terms of the minimisation of damage and the prevention of accidents, injuries and occupational diseases. We assess occupational health and safety risks regularly.

Every group company has a system and operating models in place for the reporting and investigation of near-miss incidents and accidents. We are constantly developing our occupational safety culture by various measures. In addition to employees' safety, we find it essential to ensure product safety. Olvi Group's product development as well as quality control procedures ensure that products are manufactured in accordance with high standards. Compliance with factory hygiene guidelines is the responsibility of every employee who participates in the production chain.

FURTHER INFORMATION:

- Work Safety Policy
- People Policy



THIS IS HOW WE ACT

- We address safety in everything we do, and we follow instructions.
- We bear responsibility for our health and safety and those of our colleagues by reporting all near-miss incidents and dangerous or hazardous working conditions to our supervisor or other member of Olvi Group's management.
- We comply with procedures and guidelines that ensure product quality.
- We intervene in situations that place occupational or product safety or product quality at risk.

11 | WE TAKE MEASURES TO REDUCE OUR ENVIRONMENTAL FOOTPRINT

We consume natural resources sustainably in accordance with Olvi Group's guidelines and seek to reduce our environmental footprint and increase our resource efficiency. We want to ensure that the environment is taken into consideration in Olvi Group's business and its development in line with the principles of sustainable development.

We address climate change adaptation and mitigation in our operations. In addition to emissions reductions, the sustainable use of water, the promotion of resource efficiency and the circular economy, energy solutions and biodiversity play a key role in our operations. All employees help Olvi Group improve its performance in environmental issues by complying with the Group's guidelines.

FURTHER INFORMATION:

- Environmental Policy

THIS IS HOW WE ACT

- We seek to increase the share of recycled, reused or renewable material in our packaging, among other solutions.
- We increase share of material sorting and recycling, decrease landfill waste and hazardous material to minimum. We recycle all material fractions generated.
- We optimise the consumption of energy and water.



12 | WE DISCUSS ALL SUSPICIONS OF UNETHICAL BEHAVIOUROR REPORT THEM THROUGH THE WHISTLEBLOWING CHANNEL

Olvi Group has a Whistleblowing channel for all stakeholders. Olvi Group employees are obliged to report any illegal or unethical activities they become aware of, primarily to their line manager or another supervisor in the personnel or legal department. If this does not feel appropriate, issues can also be reported anonymously through the Whistleblowing channel.

The reports are processed carefully and in confidence, coordinated by the persons responsible in Olvi Group and using the information and expertise of others to investigate the issues if necessary. We will always inform the notifier of the completed review and take any necessary measures. Further information on the safe and independent Whistleblowing channel is available on the website of Olvi Group.

FURTHER INFORMATION:

- Anti-corruption Policy
- Whistleblowing Guidelines



COMPLIANCE IS EVERYONE'S RESPONSIBILITY

WHAT DO WE EXPECT FROM OUR EMPLOYEES?

- Read, understand and follow the Code of Conduct
- Make ethical decisions in daily activities
- Treat everyone with respect
- Take action when required – discuss and report according to the situation
- Ask for advice if you do not know what to do

WHAT DO WE EXPECT FROM OUR MANAGEMENT?

- Lead by example and help your team do the same
- Make sure that your team is aware of the Code of Conduct and other policies
- Communicate the Code of Conduct and other policies regularly and provide support for activities that are in compliance

IF YOU DO NOT KNOW WHAT TO DO

Consider the following in situations where you do not know what to do:

- Lawfulness
- Compliance with Olvi Group's values
- Compliance with the Code of Conduct, policies, guidelines and practices
- Impact on reputation

Do not hesitate to talk to or ask help from your supervisor or the personnel or legal department.

PUTTING THE CODE OF CONDUCT INTO PRACTICE: **Q&A**

The following examples illustrate how olvi group's code of conduct applies to everyday situations. They cannot cover every Possible situation. If you are unsure, please seek advice from your supervisor or the human resources or legal department.

1. WE COMPLY WITH APPLICABLE LAWS AND REGULATIONS

Q. Local practice appears to be commonly accepted, but I am unsure whether it complies with the law or Olvi Group's policies. May I follow the local practice?

A. Do not proceed until the matter has been clarified. Common practice does not override applicable laws, Olvi Group's Code of Conduct or Group policies. Ask your supervisor or the human resources or legal department for guidance. If local requirements and Olvi Group's requirements differ, follow the stricter requirement unless instructed otherwise.

Q. Meeting a customer's deadline would require us to skip a mandatory regulatory check. The risk seems small. Can we make an exception?

A. No. Business urgency, financial benefit or customer pressure never justifies violating the law or bypassing a mandatory requirement. Stop the activity and raise the matter with your supervisor or the relevant specialist function. Olvi Group requires compliance with applicable national and international laws and regulations.

2. WE PROTECT THE COMPANY'S TANGIBLE AND INTANGIBLE ASSETS

Q. I need to finish an urgent task at home. May I send confidential documents to my personal email account or use my ChatGPT so that I can work on them?

A. No. Company information must only be handled using approved devices, systems, and communication channels. Sending confidential information to a personal account or an unapproved AI service may expose it to unauthorized individuals and increase the risk of data leakage. Use approved solutions only or contact Olvi Group IT for guidance via the Self service portal or Service desk email address.

Q: I received an email or message that looks urgent, asking me to click a link, verify credentials, or approve a payment/MFA prompt. What should I do?

A: Do not click links, open attachments, or approve unexpected MFA requests of email senders you can't verify. Verify unexpected requests via known communication channels, e.g. calling the sender directly. If you accidentally clicked a suspicious link or entered credentials, report it immediately to Olvi Group IT.

Q. I found an excellent presentation, photograph and infographic online. Can I copy them into an Olvi Group training material without permission?

A. Not necessarily. Copyright laws protect many types of content, including presentations, images, graphics, videos and written materials. Before using externally created materials, make sure that you have the appropriate rights, license or permission to do so. Respecting the intellectual property rights of others is as important as protecting Olvi Group's own intellectual property. If you are unsure, seek guidance before using the material. Respectively, our suppliers and partners are not entitled to use Olvi Group's logos, brands or trademarks without our explicit consent and business reason.

3. WE AVOID CONFLICTS OF INTEREST BETWEEN OUR PRIVATE LIVES AND OUR WORK AT OLVI GROUP

Q. A company owned by my partner is participating in an Olvi Group tender. I am not making the final decision. Do I still need to disclose the relationship?

A. Yes. Inform your supervisor as soon as possible and withdraw from the process, including discussions, evaluations and access to confidential tender information. The company does not necessarily have to be excluded, but the procurement process must remain fair, objective and transparent.

Q. I am unsure whether my outside activity creates a conflict of interest. What should I do?

A. Disclose the situation before taking action. A conflict does not necessarily mean that something improper has happened. The important steps are transparency and appropriate management of the situation. Also consider how the situation might appear to a customer, colleague or other external party.

4. WE DO NOT ACCEPT BRIBERY OR CORRUPTION

Q. A customer's representative suggests that the contract will be awarded to Olvi Group if I provide a personal favor. What should I do?

A. Do not agree, ignore the suggestion or continue the negotiations as if nothing happened. Pause the discussion, make it clear that Olvi Group does not accept improper arrangements and report the incident to your supervisor or the legal department.

Q. A public official asks for a small unofficial payment to speed up a routine permit or customs process. The payment would prevent a costly delay. May I pay for it?

A. No. Olvi Group does not permit facilitation or greasing payments, even if the company is legally entitled to the service and the amount requested is small. Refuse the request and report it immediately.

Q. A supplier invites me to an expensive event while we are negotiating a contract. Can I accept?

A. Do not accept before the situation has been assessed. Gifts and hospitality must be lawful, reasonable, appropriate and consistent with Olvi Group's rules. In addition to the financial value of hospitality, they must never influence, or appear to influence, a business decision. Cash and cash equivalents must never be given or accepted

5. WE SUPPORT HEALTHY AND EFFECTIVE COMPETITION AND BUSINESS

Q. At an industry event, a competitor begins discussing future prices and asks whether Olvi Group is planning similar increases. What should I do?

A. Stop the discussion immediately and make it clear that you cannot discuss competitively sensitive information. Leave the conversation if necessary and report the incident to your supervisor or the legal department. Do not ever disclose Olvi Group's competitive sensitive information or business secrets, such as current or future prices, costs, customers, tendering plans or commercial strategy.

Q. A competitor suggests that it would be easier if our companies focused on different customer groups or geographical regions. This would reduce competition and benefit both businesses. Is this acceptable?

A. No. Competitors must never agree to divide markets, territories, customers or product categories. Such arrangements are illegal in many jurisdictions and are contrary to Olvi Group's commitment to healthy and effective competition. Business success must be achieved through fair competition, product quality and innovation, not through cooperation that restricts customer choice. Co-operation agreements are not categorically prohibited but they need to be reviewed together with the legal department, especially if direct competitors would be involved.

Q. I receive confidential pricing information from a competitor by mistake. The information could help us in negotiations. May I use it?

A. No. Do not review, distribute or use information that appears to have been shared improperly. Inform your supervisor or legal department immediately and follow their instructions. Competition must be based on lawful business practices and information obtained through legitimate and ethical means.

6. OLVI GROUP COMPANIES DO NOT ENGAGE IN POLITICS

Q. A local politician asks Olvi Group to donate products to a campaign event. The donation would be legal and could strengthen local relationships. Can we agree?

A. No. The funds of Olvi Group must not be used to support a particular political party, political organization, candidate or public official. This prohibition also applies to support through related parties.

Q. Can Olvi Group participate in public-policy discussions through an industry association?

A. Olvi Group may participate in open societal dialogue and may represent its interests through industrial and trade associations. However, such engagement must be transparent, authorized and clearly separated from support for individual parties or candidates. Please remember that in some countries interactions and lobbying with e.g. members of parliament need to be reported to a public register.

7. WE COMMUNICATE HONESTLY, DILIGENTLY AND RESPECTFULLY WITH OUR STAKEHOLDERS

Q. A journalist contacts me directly about an incident involving an Olvi Group brand. I know some of the facts. May I answer?

A. Do not comment on behalf of Olvi Group unless you are authorized to do so. Politely refer the journalist to the designated communications representative and notify the communications team about the inquiry. Even well-intended comments may be incomplete, inaccurate or interpreted as an official company statement. Politely refer the journalist to the expert and inform both the communications team and your supervisor about the inquiry.

Q. I see false information about an Olvi Group product on social media. Should I correct it using my personal account?

A. Do not respond on behalf of Olvi Group unless this is part of your authorized role. Take a screenshot or otherwise retain the relevant details and inform the communications or marketing team so that they can assess the appropriate response.

Q. May I post a photograph taken at an Olvi Group site?

A. Only if taking and sharing the photograph is permitted, everyone identifiable in it has been appropriately considered, and the image does not reveal confidential information, personal data, safety-sensitive details or products and activities that have not yet been made public. If unsure, do not post it.

8. WE PROVIDE INVESTORS WITH UP-TO-DATE AND RELIABLE INFORMATION

Q. I learn at work about financial results or a significant business development that has not yet been announced. May I buy Olvi shares before the information is published?

A. No. You must never trade or advise anyone else to trade with Olvi plc's securities if you possess inside information. Follow Olvi Group's Insider Guidelines, acquire Olvi plc's shares only as long-term investments and set your trading for the days following the interim or financial statements publication, when the market can be considered to have the most equal information about Olvi Group's financial performance.

Q. A key investor asks me to confirm information before it is released publicly. Can I provide the information because the investor already seems to know it?

A. No. Non-public information must not be confirmed or disclosed selectively. Olvi Group ensures equal treatment of investors by releasing relevant financial information to stakeholders simultaneously through authorized channels. Refer to the inquiry into the function responsible for investor communications.

9. WE RESPECT HUMAN RIGHTS AND PROVIDE EQUAL OPPORTUNITIES

Q. During a supplier visit, I notice signs that workers may be subjected to unacceptable working conditions. I do not have proof. Should I still raise the matter?

A. Yes. Do not conduct your own investigation or make accusations. Record the relevant factual observations and discuss them promptly with your supervisor, sourcing function or legal department. A reasonable concern is sufficient to seek advice, and Olvi Group must be able to assess potential human rights risks in its value chain.

Q. A colleague makes an inappropriate sexual comment about another employee during a coffee break and laughs it off as a joke. What should I do?

A. Make it clear that the comment is not appropriate. Sexual comments about colleagues can contribute to a culture where harassment is tolerated. Small incidents should not be ignored simply because they occur informally or are presented as humor. If necessary, raise the matter with your manager, HR or another appropriate channel. Olvi Group has zero tolerance for harassment and inappropriate behavior.

Q. I witnessed behavior that I believe may have been harassment, but the person affected has not complained. Should I stay out of it?

A. No. Everyone shares responsibility for maintaining a respectful workplace. If you see behavior that may violate our standards, consider addressing it respectfully, offering support to the person affected or raising the concern with your manager, HR or another appropriate channel.

10. WE GIVE PRIORITY TO OUR PERSONNEL'S HEALTH AND SAFETY

Q. I notice a spill on the floor. A colleague nearly slips but is not injured. Do we still need to report it?

A. Yes. Prevent access to the hazard, if you can do it safely, arrange the cleaning and report the near-miss in accordance with local procedures. Reported near misses help us to identify risks and to prevent future injuries.

Q. A colleague is ignoring safety instruction, because following it would slow down the production. I am not their manager. Should I intervene?

A. Yes. Stop the unsafe activity, if you can do it without creating further danger and involve the responsible supervisor, if necessary. Everyone is responsibility to intervene, when occupational safety, product safety or product quality is at risk.

Q. I notice that a colleague has recently appeared unusually tired, withdrawn or overwhelmed. What should I do?

A. Approach the situation with care and respect. You do not need to solve the issue yourself, but you can check how the colleague is doing and encourage them to seek support if needed. Mental health and wellbeing are important parts of workplace health, and we all share responsibility for creating a supportive work environment.

Q. I notice a possible product quality or hygiene issue, but I am not certain that it affects product safety. What should I do?

A. Report it immediately and follow the applicable quality and safety procedure. Do not assume that the issue is insignificant or wait for someone else to notice it. A seemingly minor deviation can have serious consequences.

11. WE CONTINUOUSLY TAKE MEASURES TO REDUCE OUR ENVIRONMENTAL FOOTPRINT

Q. I notice that waste is repeatedly placed in the wrong recycling containers and unnecessary lighting and equipment are left on. Is this too minor to raise?

A. No. Everyday actions contribute to Olvi Group's resource efficiency. Raise the matter constructively with the person concerned or your supervisor and follow local recycling and energy-saving instructions.

Q. A supplier may be violating environmental requirements, but changing suppliers could disrupt production. Should we wait until the next contract renewal?

A. No. Raise the concern promptly with your supervisor, sourcing function or environmental specialist. Business continuity does not justify ignoring a possible legal or environmental violation. The matter must be assessed and appropriate action taken.

12. WE DISCUSS ALL SUSPICIONS OF UNETHICAL BEHAVIOR OR REPORT THEM THROUGH THE WHISTLEBLOWING CHANNEL

Q. I suspect misconduct, but I do not have proof. Can I still report my concern?

A. Yes. You do not need to investigate the matter or prove that misconduct has occurred. Report the facts and observations available to you honestly and in good faith. The responsible persons will assess and, where necessary, investigate the concern.

Q. Should I first confront the person I suspect of misconduct?

A. Not necessarily. Direct discussion may be suitable for some minor everyday concerns, but it may be inappropriate in cases involving suspected fraud, corruption, serious harassment, safety risks or other serious misconduct. Do not conduct your own investigation. Seek guidance from your supervisor or the human resources or legal department or use the Whistleblowing channel to report the concern.

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