

Metsähallitus Code of Conduct



The Code of Conduct supports our work

This Code of Conduct is intended for us at Metsähallitus, regardless of what our positions are or where in Finland we work. It is our common guideline that sets out our rights and obligations, both within the work community and in relation to customers, suppliers and other stakeholders.

Rather than being just a set of rules, the Code of Conduct supports us in our daily choices and helps us act responsibly and consistently. It helps us build trust and ensure that what we do is in line with Metsähallitus' values and objectives.

This Code of Conduct is based on our strategy, 'Fostering our Future', and our values: joy, sustainability, cooperation and effectiveness. These values are reflected in how we treat each other, how we serve our customers, and how we develop our activities together.

Juha S. Niemelä,
Director General of Metsähallitus

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Photos: Katri Lehtola and Mikko Törmänen Metsähallitus, Helsinki, 2025



What is Metsähallitus?

Metsähallitus engages in commercial activities in its fields of operation and handles the public administration services assigned to it.

Metsähallitus' mission is to use, manage and protect the state-owned land and water assets under its stewardship and to produce overall societal benefits by reconciling environmental protection with diverse and sustainable use of natural resources. Metsähallitus must operate effectively, which is why efforts to develop our activities are guided by the aim of boosting profitability and productivity.

As a state enterprise, Metsähallitus is steered by both the Ministry of Agriculture and Forestry and the Ministry of the Environment. Metsähallitus has a unique status, and our versatile tasks are laid down in the Act and Decree on Metsähallitus and the legislation applicable to our fields of operation. Our operations are based on business principles. Our activities and objectives are steered

The Code of Conduct as part of the management system

The Code of Conduct is the cornerstone of our responsible and compliant activities. Responsibility and compliance are also integrated into Metsähallitus' strategy, brand, objectives and action plans. The purpose of the Code of Conduct is to make Metsähallitus' values clear and genuinely help Metsähallitus employees to get it right.

by ownership policy guidelines as well as service and other operational targets approved by the Parliament. We also follow and comply with central government guidelines, resolutions and recommendations on corporate governance.

Corporate governance defines our decision-making structure and practices as well as our relationship with stakeholders. Our strategy, values and Code of Conduct have a cross-cutting influence on our governance system.

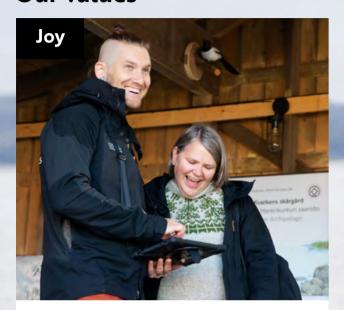
Metsähallitus' management system

Parliament & Government Key service targets and other operational targets of Metsähallitus Ministry of Agriculture and Forestry & Ministry of the Environment Detailed service and operational targets, performance target and target for contribution to state revenue **Act and Decree** Metsähallitus ownership on Metsähallitus policy guidelines Metsähallitus Group business units - Group units - subsidiaries Fostering our Future strategy Metsähallitus Board of Directors Values and Code of Conduct **Rules of Procedure Policies Director General and Management Group** Operational management system **Group guidelines** Work instructions

Compliance

Fostering our Future

Our values



Joy is more than just a momentary feeling – it is an attitude and a way of doing things.

- We find joy and meaning in our daily tasks and encounters.
- Our work matters to both nature and Finnish society – the happiest people in the world!
- Joy creates an atmosphere in which everyone can feel valued and motivated.
- Joy helps us see challenges as opportunities and encourages us to try new things.



We do our daily work sustainably, cherishing the value of nature and our shared wealth.

- By tending and protecting nature, we develop well-being, competence and safety.
- We make full use of the latest information, technologies and the feedback we receive.
- We promote innovation and renewal as part of sustainable development.
- We are committed to intergenerational learning and continuous improvement.



Cooperation is at the heart of what we do.

- We listen to each other, our customers, our partners and our stakeholders.
- We share information and make coordinated decisions together.
- Our work is based on trust, openness and integrity.
- We develop our activities together with our stakeholders, putting the customer at the centre.



Effectiveness stems from our responsible and sustainable practices.

- We ensure that our work will always be socially acceptable.
- We strive for continuous improvement and goal achievement.
- Our results can be seen as effectiveness, achievement and economic growth.
- We promote our employees' wellbeing as well as foster biodiversity.

Our mission: Fostering natural values and taking care of our shared wealth responsibly across generations.

Our Code of Conduct



Responsibility and compliance are the cornerstones of our work

impact.

We ensure compliance in everything we do, including our decision-making and processes.

Compliance refers to adhering to all laws, commitments, rules and principles applicable to Metsähallitus. In the area of compliance, Metsähallitus prioritises anticipation and proactive intervention. Active compliance enables us to guide our own and our partners' activities and improve our reliability.

Our activities are based on environmental values and social responsibility. We are committed to the United Nation's 2030 Agenda for Sustainable Development and the UN Universal Declaration of Human Rights. We comply with the UN Guiding Principles on Business and Human Rights (UNGP) and the due diligence process, which is based on OECD Guidelines for Multinational Enterprises.

We are committed to continuous improvement in environmental issues and the promotion of sustainable use of the environment. We comply with the PEFC forest certification system's criteria, which ensure that our activities support sustainable forest management and use as well as responsible procurement of raw materials. In addition, the ISO 14001 environmental management system

helps us manage
and reduce our environmental



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We address environmental responsibility and use the assets we manage sustainably

We manage, use and protect all state-owned land and water assets under our stewardship responsibly and sustainably. Environmental issues are part of the daily work of Metsähallitus employees. We work systematically to protect the environment and to promote sustainable use of natural resources. We undertake to address climate change mitigation and adaptation in everything we do.

We safeguard natural values in state-owned land and water areas, maintain viable game and fish populations, and preserve cultural heritage. Our goal is to foster and strengthen biodiversity in state-owned areas. We restore and manage habitats, develop ecological networks and carry out species conservation measures. We reconcile these objectives with the needs of Metsähallitus' business and other livelihoods pursued on state land, recreational use and hunting and fishing. We create preconditions for local operators, increasing the vitality and well-being of the regions.

We regularly assess the material impacts of what we do on the climate and the environment. We strive to prevent, mitigate and restore the negative impacts of our activities and to strengthen the positive ones. We also identify and manage climate and environmental risks related to our operations. We also expect our contracting partners to promote these practices in their activities.

We manage the maintenance and safety of the assets under our stewardship and protect them against damage, accidents and criminal activity.

Examples of our positive and negative environmental impacts

Fostering biodiversity through restoration and nature management work is one of the positive impacts of our activities. Our negative impacts include greenhouse gas emissions, for example from off-road machinery.





We use data and information efficiently

We understand the value of high-quality information and systematically build our information capital for the common good. We base our decisions on information in order to enhance the impact of our work. As part of developing our activities, we welcome new ways of using data and experimentations with them. Before launching new types of data processing, we ensure that they meet information management and data protection requirements.

We operate systematically, transparently and using common terminology in efforts to develop and manage Metsähallitus' information assets, making diverse use of the data and information possible for those with access rights. We ensure the openness and usability of data and information. We ensure that data are classified and processed securely to prevent breaches and misuse. We ensure compliance in all data processing and ensure that secret data are protected appropriately.

We take a determined approach to information management, information security and data protection. We monitor developments in the operating environment related to them and invest in continuous improvement of competence and activities. We assess the risks associated with the data and information management for which we are responsible and take the necessary measures to manage these risks.

In addition to the data belonging to us, we only process our customers' and stakeholders' data as agreed and observing privacy protection. In everything we do, we respect the business secrets and intellectual property rights of Metsähallitus and third parties.

As a Metsähallitus employee

- 1. I ensure that the data I use and for which I am responsible are reliable, up to date and available to those how have the right to access them.
- 2. I assume responsibility for ensuring that information included in the case management system has been saved following instructions.
- 3. I only use secure data connections.





We respect human rights and equality

At Metsähallitus, human rights are part of responsibility and compliance. We respect human and fundamental rights and are committed to promoting the realisation of human rights. We strive to ensure that our personnel, customers, partners and stakeholders act and are treated fairly and equally. We behave fairly and equally towards everyone. We do not tolerate discrimination on the basis of age, gender, ethnic or national background, language, beliefs, religion, opinion, disability, state of health, sexual orientation or other personal characteristics. We require our contracting partners to refrain from participating in human rights violations. We support the elimination of all forms of modern slavery, including forced labour and child labour, and actively seek to address their risks in our activities and value chains.

We assess the impacts of our daily activities on people and strive to ensure that what we do does not cause or contribute to adverse effects through our contractual relationships. If we cannot fully avoid involvement in causing harm, we follow the due diligence process: mitigate the impacts, prevent their recurrence and, if necessary, offset the harm caused.

Equality is a fundamental and human right. This means that all people are equal, regardless of their personal characteristics.

We identify stakeholders relevant to our activities as well as their goals and needs relating to the use of state-owned land and water areas. We engage in dialogue with our stakeholders and take their perspectives into account when planning and carrying out our work. It is important for us to gain the trust of our stakeholders through successful reconciliation and cooperation.

Reindeer husbandry The Sámi Reindeer husbandry is a traditional livelihood in Northern Finland and protected under the Reindeer Husbandry Act. The reindeer graze freely in the reindeer herding area, which includes not only the region of Lapland but also parts

of Northern Ostrobothnia and Kainuu.

Under the Reindeer Husbandry Act the

State authorities must, when planning

measures concerning state land that will

have a substantial effect on the practice of

reindeer herding, consult the representatives

of the reindeer herding co-operative in question.

Metsähallitus manages more than 90 per cent of the land and water areas in the Sámi Homeland. In this area, Metsähallitus coordinates the management, use and protection of natural resources under its stewardship, ensuring that the preconditions for practising the Sámi culture are safeguarded. Metsähallitus negotiates with the Sámi Parliament on all significant issues related to the use of land and natural resources in the Sámi Homeland.

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We create a positive working atmosphere and value each other's work

Metsähallitus relies on people for its success – we succeed together. Our operating culture grows from the actions of all Metsähallitus employees. We consciously build a sense of community, support each other and create and maintain a positive working atmosphere in which everyone can be themselves. Our community does not tolerate any inappropriate behaviour and intervenes in it whenever such behaviour is encountered. We all have the right to good management and constructive feedback and, in turn, a duty to have good work community skills and respect each other.

Metsähallitus attends to the competence and effectiveness of our work community and maintains its employees' work ability. At Metsähallitus, we participate regularly in training to maintain our professional skills, and we share our competence with each other. We value cooperation skills in our work and build an interactive culture in which we value each other. Our daily work and decision-making are guided by Metsähallitus' values: joy, sustainability, cooperation and effectiveness. We promote an open and inclusive discussion culture and encourage openness to develop our activities.





We are a responsible actor and operate reliably and openly. Openness helps to prevent misunderstandings about the purposes of our activities. In decision-making and handling of all matters, we fulfil Metsähallitus' obligations and keep Metsähallitus' overall interests in mind.

Our contractual activities are based on common operating methods that each Metsähallitus employee follows. We respect the requirements of fair competition and base our procurements on impartial, transparent and responsible criteria. We never participate in business transactions if we suspect that they involve money laundering, terrorist financing or other similar illegal activities.

We expect our contracting partners to comply with the principles of this Code of Conduct. Before any cooperation is started, we conduct careful background checks, which include ensuring and monitoring that our partners are not subject to sanctions. In addition, we monitor our partners' operating practices more extensively and intervene in possible violations.





We do not tolerate bribery or corruption, and we step aside in conflict of interest

Metsähallitus has zero tolerance for all types of bribery and corruption. Corruption refers to abuse of power to gain unjustified advantages. We do not tolerate giving or accepting unjustified advantages, participating in decision-making when there is a conflict of interest or favouring anyone. Ethically reprehensible action is prohibited: when assessing the acceptability of actions, attention must be paid to what they look like to the outside world.

We recognise practices that are or can be interpreted as corrupt. When we detect potential corruption, we prevent it and report it as specified in this Code of Conduct.

We only accept ordinary and reasonable hospitality and gifts relevant to Metsähallitus' activities. Donating products and providing support to stakeholders in individual cases are possible within the limits of our guidelines. We never offer or accept money or gift vouchers.

As Metsähallitus employees, we do not participate in handling a matter if we have a conflict of interest. A person is disqualified when their relationship with the matter under consideration or parties involved in it put their impartiality at risk. An employee may

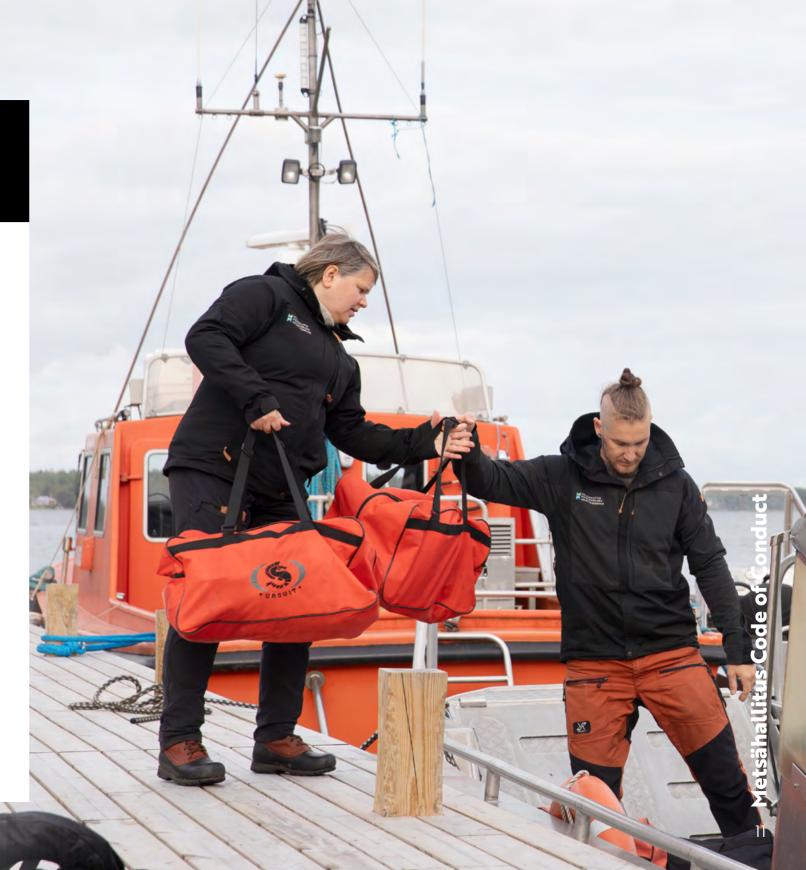
not take part in the consideration of a matter if they,

parties close to them, or communities represented by the employee or by parties close to the employee have a vested economic or other interest in the matter. Everything we do as Metsähallitus employees can withstand scrutiny by third parties.

When taking on secondary occupations or positions of trust, we must avoid situations where we have to discuss or comment on matters that concern Metsähallitus' interests or obligations. We also observe the prohibition of competing activities as well as duties of loyalty and secrecy in everything we do.

As a Metsähallitus employee

We are all responsible for combating corruption. I do not give, offer, request, demand or accept bribes or other unjustified advantages that could affect the objective and impartial performance of tasks. I also do not advise, encourage, entice or instruct anyone to take or give bribes, directly or indirectly.



Transparency and reporting concerns help us get it right

At Metsähallitus, we communicate openly about what we do and what our impacts on society and the environment are. We keep actively in touch with our stakeholders. We wish to promote open dialogue and learn from others, also when we disagree with someone.

We foster an open, respectful and constructive discussion culture. We appreciate different perspectives and take any concerns that have been raised seriously. Everyone in Metsähallitus has the right and duty to bring up their observations, concerns and new viewpoints. Open dialogue is the foundation of developing together.

We believe that challenging each other constructively promotes learning, goal achievement and a sustainable future. While focusing on our own tasks, we take into account

their impact on other employees and units. Our work is coordinated to ensure that we can achieve the overall objectives of Metsähallitus.

We maintain a trusting and safe atmosphere at Metsähallitus. We want to ensure that we can talk about any and all concerns. Everyone in Metsähallitus has the right and duty to bring up their observations when they suspect breaches of our Code of Conduct or other shortcomings. It is important that we can intervene in potential problems as early as possible.

Metsähallitus' whistleblowing channel

There is no threshold for reporting; no suspicion is too small or large. Our whistleblowing channel can be used with a low threshold, and reports can be submitted anonymously if preferred. All reports are handled in confidence and in compliance with the Whistleblower Act.

Anyone can submit a report, also from outside Metsähallitus

» Click here to go to the whistleblowing channel

As a Metsähallitus employee

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1. I recognise my responsibility to report
If I notice or suspect that something
we do is not compliant with
Metsähallitus' Code of Conduct, I do
not hesitate to report it.

2. I report my observations:

- to my supervisor
- · To a HR contact person
- on our whistleblowing channel
- 3. I adhere to our shared values
 I promote openness, responsibility
 and trust in our work community.

Handling and follow-up of reported concerns

At Metsähallitus, all suspected misconduct is investigated carefully, impartially and confidentially without undue delay. If the investigation shows that the concern is justified appropriate corrective action, including possible sanctions, will be taken.

All reports are taken seriously and handled in compliance with the Whistleblower Act. The whistleblower's position is safeguarded, and they incur no negative consequences for making the report.

Metsähallitus PL94 FI-01301 Vantaa, S

Metsähallitus

- Fostering natural values and taking care of our shared wealth responsibly across generations.

