

## Non-discrimination and anti-harassment policy

Valmet is an inclusive workplace where employees as well as potential employees, customers and vendors treat each other with respect. Valmet does not allow discrimination or harassment in any form and actively takes both preventive as well as corrective measures to ensure a respectful and inclusive workplace free from discrimination and harassment for both employees as well as applicants, customers and vendors.

### 1. Scope and validity of the policy

This policy covers all employees, customers, partners or any person associated with our business activities, e.g. employees including blue and white collar employees, fixed time or regular employees, full or part time employees, supervisors, managers and senior managers as well as Valmet's employees in connection with their work by non-employees, including, but not limited to, contractors, subcontractors, vendors, customers or clients.

The policy governs actions and behavior not only at Valmet offices and manufacturing locations but also in remote, virtual, customer site, off-site and travelling situations.

### 2. Definitions

Valmet's Code of Conduct defines the morals and ethics, responsibilities, and proper practices for individuals, teams, and the company. The Code of Conduct applies to all personnel and external stakeholders. It defines Valmet's way to operate e.g. in terms of respect for human rights, equal opportunities, diversity and inclusion as well as respectful work environment. Please refer to the Code of Conduct for more information on Valmet's requirements and expectations for each of these topics.

#### 2.1 Non-discrimination at Valmet

Discrimination is the unequal or unfair treatment of people based on the groups, classes, religions or any other categories to

which they belong or are perceived to belong.

Valmet is committed to promoting equal opportunities for all employees, regardless of age, disability, ethnic or national origins, gender reassignment, marital/civil partnership status, pregnancy or maternity, race, religion or beliefs, sex, and sexual orientation. We recognize the business benefits of having a diverse workforce and we aim to create and sustain a work environment that values diversity and provides equal opportunities to everyone.

Valmet does not accept or allow discrimination in any form, except where positive discrimination is provided for within local legislation.

Examples of discriminative behaviors may include:

- Excluding candidates based on their age
- Using biased justification when allocating salary increases
- Intentionally excluding training or learning opportunities from certain types of employees
- Not making the workplace easily accessible for people with disabilities
- Not inviting a person to a meeting because they speak a different language

#### 2.2 Anti-harassment at Valmet

Harassment refers to comments or actions towards a person which are unwelcome, or generally known to be unwelcome, to the individual to whom they are directed. Harassment can be non-sexual or sexual in nature.

In accordance with the Valmet Code of Conduct, Valmet does not tolerate any conduct by any employee, customer, partner or any person associated with our business activities that harasses, threatens, disrupts or interferes with another person's work performance or creates an intimidating, offensive, abusive, or hostile work environment.

Valmet does not accept or allow for harassment in any form, including non-sexual and sexual harassment.

Harassment includes, at minimum, the following:

- Offensive remarks, comments, jokes, slurs, or verbal conduct
- Offensive pictures, drawings, photographs, figurines, or other graphic images, conduct, or communications, including e-mail, copies and messaging
- Offensive sexual remarks, sexual advances, or requests for sexual favors regardless of the gender of the individuals involved
- Offensive physical conduct, including touching and gestures, regardless of the gender of the individuals involved
- Isolating a person from the work community (e.g. not talking or forbidding others to talk to a person, not greeting, not listening, restricting the expression of their opinion or interrupting the other person's speech constantly or isolating the person to work completely separately)
- Unfounded criticism and aggravation (e.g. excluding the person from information channels, continuously undermining the persons work or assessing it according to unfair criteria, intentionally assigning the person tasks, which are impossible or below their skill level or not giving any work tasks at all)
- Questioning the reputation or the position of the person (e.g. disseminating false information, speaking badly behind their back, humiliating or mocking)
- Violation of personal integrity (e.g. shouting, giving verbal and written threats, assaulting, outright violence or sexual harassment)

### 3. Preventive measures

Valmet is actively working on creating measures to prevent discrimination and harassment, including addressing the topics through the company values, employee / manager / senior manager role descriptions, in company policies and processes, and with training and communication.

### 3.1 Valmet values

One of Valmet's values is People - we work together to make a difference. This refers to all employees behaving in a respectful way towards each other, embracing diversity and valuing teamwork.

### 3.2 Employee and manager roles

The Valmet employee role states, for example, that it is in the employee's role to value the contribution of others, ensure fair and ethical treatment of others and take care of own health, safety and wellbeing, and that of others.

The Valmet manager role states, for example, that it is the manager's role to ensure appropriate standards of behavior, ensure fair and ethical treatment of people, and promote health, safety and wellbeing.

Likewise, the Valmet senior manager role states, for example, that it is the role of the senior manager to set compliance and behavioral standards, ensure fair and ethical treatment of people, and to promote a health and safety culture.

### 3.3 Policies

Global and local policies, guidelines and practices for non-discrimination, anti-harassment and equal opportunities direct the Valmet way to operate. The principles of these policies, guidelines and practices are built into the people processes, such as the recruitment and salary planning processes.

### 3.4 Training and communication

Training to create awareness and prevent discrimination and harassment is organized on global and local levels. In addition, non-discrimination and anti-harassment are covered as separate sections in the Code of Conduct training which is mandatory for all Valmet employees and is renewed and updated regularly. We also actively communicate on topics related to being an inclusive workplace free from discrimination and harassment.

#### 4. Reporting and handling incidents

The steps to report and handle incidents:

- Reporting the incident
- Investigating the incident
- Concluding the incident
- Corrective and disciplinary actions

##### 4.1 Reporting the incident

At Valmet, we want to nurture a culture of openness and feedback. Anyone who has experienced harassment or inappropriate behavior should speak up and report their experience, either immediately or as soon as possible, to the person who behaved inappropriately. At best, the situation can be resolved between them. If your complaint is about a person’s behavior, you should ask the person to stop, or tell them that their behavior is offensive or hurtful. The other person may not realize their behavior is unwelcome or unacceptable. If your complaint is about a work decision, you should consider saying why you think the decision is unfair, inappropriate etc.

Any employee who experiences or observes harassment, discrimination or retaliation is expected to report the incident officially. According to [Valmet’s Code of Conduct](#), failing to report noticed misconduct is considered unethical behavior in itself.

There are three ways to report:

Primary: Manager or their manager, HR

or

Secondary: Legal or Internal Audit

or

When other channels do not feel comfortable: TrustLine reporting channel

Valmet offers several reporting channels for voicing concerns on suspected misconduct. Irrespective of the chosen reporting channel, all reports will be handled in a

secure manner that ensures confidentiality of the identity of the reporting person.

Primarily Valmet encourages employees to report any suspected misconduct to their manager or raise them with HR. If due to the nature of the matter or due to confidentiality concerns this is not possible, employees can also raise concerns directly to Legal (including Ethics & Compliance) or Internal Audit.

If these options do not feel comfortable, or you would prefer to report anonymously, reports can be made through [TrustLine](#).

TrustLine is Valmet's anonymous reporting channel, and it is maintained by a third party to guarantee anonymity. Valmet will not know who has made the report unless the reporter identifies themselves. Reports made to TrustLine can initially be seen by the Head of Internal Audit, General Counsel, Manager, Ethics & Compliance, and SVP HR & Operational Development.

The reporter can choose whether they want to make the report in TrustLine online in writing, or by telephone to a call center. TrustLine is available 24/7 and reports can be made in the language the reporter feels the most comfortable with.

##### 4.2 Investigating the incident

All reported cases will be taken seriously, investigated, and resolved appropriately. Investigations will be led by an impartial person or department and persons who may have participated in the misconduct will not perform the investigative actions or make decisions on consequences.

##### 4.3 Concluding the incident

After the investigation and review of the facts, the case will be evaluated, and appropriate conclusions and follow-up actions will be taken. All investigations will be documented and reported in accordance with Valmet instructions and templates. More details can be found in the [Misconduct Reporting Guideline](#).

#### 4.4 Corrective and disciplinary actions

Violation of this or any other Company policy are subject to discipline, up to and including immediate termination. Depending on the severity of the violation and the local regulations, a disciplinary action can take different forms, including: a verbal warning, a written warning, a poor performance review or evaluation a reduction of rank or pay and termination. Contractors who are found to have breached this policy may have their contracts with Valmet terminated.

Julia Macharey  
SVP, HR & Operational Development  
Valmet