



Atria Code of Conduct

ATRIA

Good food – better mood.

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Dear reader

Performances that are good now will be just mediocre in a year. In a market environment that demands increasingly rapid change, responsible procedures become more important. Clear guidelines are needed for business operations – what to do and what not to do. Decisions on how to do things are also needed.

Atria Code of Conduct was revised in autumn 2014 following extensive value discussions within the Group. During the revision, we noticed that our common Code of Conduct includes the common procedures and values that were defined together by the personnel. The principles were also updated in autumn 2016.

Atria's revised Code of Conduct provides us with solutions for our everyday operations. When we are all familiar with the common procedures, our everyday decision-making – where we all ultimately make a difference – will become easier and faster. This will enable us to better meet the expectations of consumers and customers as well as those of our shareholders.

Only responsible companies can succeed.

Juha Gröhn
Atria Plc
CEO

Atria Code of Conduct

Atria Code of Conduct provides ethical guidelines for the everyday operations of Atria employees. The Code of Conduct concerns all Atria employees in all business areas. The personnel will be trained in following Atria Code of Conduct according to Atria's training plan.

The Code of Conduct reflects the Atria Way of Work values defined by the company's personnel: "We focus on consumers and customers, we deliver quality, we are hungry for success and we enjoy our work". By working in accordance with these values, Atria can guide its practical operations towards sustainable development and success by following uniform operating principles.

The laws and collective labour agreements of the country of operation and international agreements and recommendations related to responsible operations constitute the foundation of Atria Code of Conduct.*

Atria Plc's Board of Directors approved Atria Code of Conduct at its meeting on 26 October 2016.

Part of the Atria's Handprint programme

Atria Code of Conduct is part of the extensive Atria's Handprint programme. The Atria's Handprint programme gathers the principles, practices and results of Atria's responsible operations and provides employees and external stakeholders with information on them.

The Atria's Handprint programme began in August 2010, when the Group's management team approved it.

The objectives and results of the Handprint programme are published annually in Atria's corporate responsibility report. The report is available at www.atriagroup.com/en/corporateresponsibility.



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- UN Universal Declaration of Human Rights and Convention on Rights of the Child
- Agreement of the International Labour Organisation (ILO) on basic rights at work
- UN Global Compact initiative for the promotion of human rights, rights at work and environmental protection and the prevention of corruption
- OECD code of practice for multinational companies
- Business Charter for Sustainable Development of the International Chamber of Commerce (ICC) and ICC instructions against bribery and corruption
- Business Social Compliance Initiative (BSCI) purchasing principles

Safe Atria Quality

Atria's production plants and food processing processes follow international hygiene requirements and standards. High-quality raw materials, efficient manufacturing and delivery processes and an uninterrupted cold chain guarantee that Atria's products are safe to consume.



Product safety

All of Atria's production plants use a food safety management system compliant with the FSSC 22 000 standard or an equivalent system.

Risk management for the manufacturing process is carried out using the HACCP system, whose operational efficiency is ensured through regular inspections.

Hygiene

Employees working in production units, as well as people visiting production units, will be taught about hygienic ways of working and the requirements for personal hygiene in food processing facilities.

Traceability

In order to guarantee Safe Atria Quality, Atria has tracing systems for raw materials, ingredients and end products.

Thanks to the traceability system, Atria can openly provide more information on the origin of its products to consumers.

Products not genetically modified

Atria does not use genetically modified raw materials in its food. In order to guarantee this, product suppliers are required to commit in writing to delivering GM-free raw materials.

Product information

In order for consumers to be able to choose Atria's products with confidence, Atria provides all key product information to help consumers decide. For example, ingredients and nutritional information are clearly indicated on the packages in compliance with the local legislation of each country. Additional information about products is available on Atria's website.

Nutrition

When developing new products and improving its existing ones, Atria takes into account their impacts on consumer health.

Atria guides consumers in the use of products according to nutritional recommendations as part of a healthy and nutritious diet.

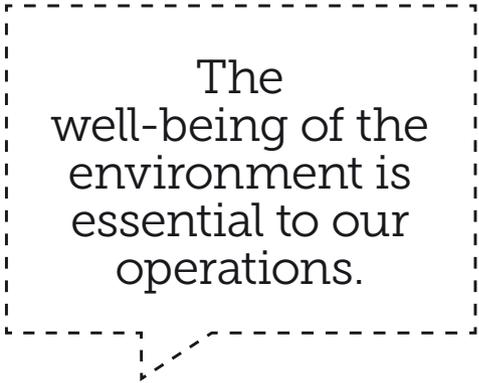
Responsible use of additives

Atria assesses the need for additives in terms of both consumer health and product safety. Only additives that are important in terms of product characteristics and have a proven safety record are used in the products.

Atria actively monitors the legislation and official recommendations related to additives and takes consumers' expectations into account regarding the responsible use of additives in its productisation.

Environment

The starting point of Atria's environmental management is to ensure that all operations comply with local legislation and statutory requirements. At the same time, Atria continuously strives to further improve its results in environmental management and is committed to monitoring the environmental impacts of its operations, products and services and to identifying the significance of the environmental impacts of each stage of the operating chain.



The well-being of the environment is essential to our operations.

Management of environmental issues

All of Atria's production plants have taken into use environmental systems compliant with the ISO 14 001 standard and energy management systems compliant with the ISO 50 001 standard or equivalent systems. Atria is committed to ensure the availability of information and of necessary resources to achieve its environmental and energy objectives and targets.

Transparency

Atria reports its environmental responsibility in the corporate responsibility report annually. Atria openly discusses and works together with local authorities in matters related to environmental protection.

Internal communications

Atria internally communicates its common energy and environmental goals and those of each unit. Furthermore, employees are provided with information about their roles in Atria's environmental programme and are responsible for following them in order to achieve the set goals.

Life cycle of products

Atria recognises the environmental impacts of its products throughout their life cycles. The environmental impacts of Atria's products are minimised by utilising raw materials efficiently and by taking care of energy efficiency throughout the supply chain.

Atria continuously monitors the eco-efficiency of its product lines. In the industry, the highest quantity of energy and water is consumed by highly processed products, such as precooked meat products. However, processing raw materials so that they meet different consumer needs and situations reduces raw material wastage and, therefore, also reduces the environmental impacts of products.

Stakeholders

Atria's corporate responsibility policy is embodied in the day-to-day work with stakeholders. Atria uses various surveys, inquiries and analyses as well as personal interaction with stakeholders to gain extensive knowledge of their expectations.

Consumers, customers, personnel, meat producers and shareholders are strategically important stakeholders to Atria. Other stakeholders include raw material and material suppliers, authorities, financial institutions, educational institutes and the media.



Customers

Atria works together with its customers in order to understand their business. This enables Atria's services and products to meet customers' needs.

Consumers

Atria's product development and marketing are guided by the results of consumer research and direct consumer feedback. Atria engages with consumers on various social media services.

Atria complies with FoodDrinkEurope's recommendations for responsible food marketing communications.

Raw material and material suppliers, meat producers and subcontractors

Atria requires that its partners follow Atria Code of Conduct or equivalent responsibility principles of at least the same level in their operations.

Furthermore, purchase contracts obligate partners to meet Atria's requirements for product quality, procedures and the delivery chain.

Communities

Atria promotes the well-being of local communities primarily by offering jobs and paying taxes, but also by participating in development projects run by local communities when the operations support Atria's business goals.

Authorities

Good cooperation with authorities is the cornerstone of Atria's business. Cooperation with authorities ensures that the legislator gets the right information from the sector and that Atria always complies with the latest laws in force.

Shareholders

Atria strives to achieve its financial objectives in a way that generates long-term financial value for the company's shareholders.

Personnel

Atria respects and supports internationally recognised human rights principles and promotes their implementation in all of its business areas. Compliance with local legislation and the key conventions of the International Labour Organisation (ILO) constitutes the foundation of Atria's HR principles.



Promoting the personnel's well-being and developing their skills are key features of Atria's social responsibility. The quality of Atria's operations and products and the achievement of future growth and profitability targets depend on these factors.

The Atria Way of Work values defined by Atria's personnel are:

- We focus on consumers and customers
- We are hungry for success
- We deliver quality
- We enjoy our work

Promotion of well-being

Atria promotes the mental and physical work capacity of its personnel by developing working conditions and occupational well-being in the long term.

Occupational safety

Atria ensures occupational safety by providing safe working methods to its personnel and by monitoring that they are followed.

Development of skills

Recruiting and committing motivated employees and developing their professional skills are the foundation of Atria's success. The skills of the entire personnel are monitored and developed in line with the strategy.

Equality

Atria does not tolerate any kind of discrimination at work. Qualified applicants have equal opportunities to be hired, make progress in their careers, increase their salaries and improve their skills regardless of their race, religion, ethnic

or national background, gender, sexual orientation, age or disabilities.

Remuneration

Atria pays its employees a competitive salary or other compensation in accordance with a written employment contract.

Bullying and harassment

Any behaviour that an individual or a group may experience as unwelcome, humiliating, threatening or hostile can be considered harassment. Atria does not tolerate such behaviour and will intervene immediately in any cases of bullying or harassment.

Use of intoxicants

The use and possession of drugs, alcohol and other intoxicants that impair work capacity are strictly forbidden at the workplace.

Child labour

Atria does not allow the use of child labour.

Forced labour

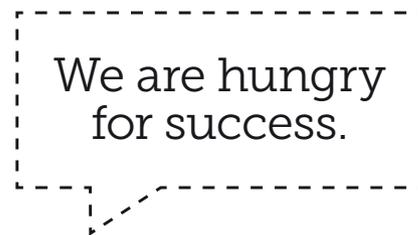
Atria does not allow the use of forced labour.

Freedom of association

Atria respects the freedom of association of its employees.



Business integrity



Compliance with healthy and responsible business practices constitutes the foundation of all of Atria's operations.

Compliance with legislation

Atria is listed on the Nasdaq Helsinki. As a listed company, it must comply with legislation concerning the securities market, such as the market abuse regulations and the Securities Markets Act. Compliance with applicable legislation and respect for the principles of good administration and for the OECD code of practice for multinational companies constitute the foundation of Atria Code of Conduct.

Competition legislation

Atria supports fair and open competition. Atria complies with applicable legislation on competition and does not accept unlawful conduct. Atria's employees must avoid situations that involve a risk of breaching the legislation on competition.

Fight against corruption

Atria does not accept any kind of bribery in its operations. Atria's employees must not give or take benefits, gifts or hospitality that could inappropriately influence business decisions.

When doing business, it is allowed to give and take minor and reasonable benefits, gifts or hospitality.

As regards the authorities, special care and consideration must be taken when offering benefits, gifts or hospitality. Benefits, gifts and hospitality offered to authorities – even if of little value – may be unlawful if the authorities in question are able to influence decisions related to the person who offered them.

It is forbidden to offer benefits and money to authorities with the intention of speeding up normal official decisions.

Financial information

Atria's bookkeeping and reporting follow national laws and international financial reporting standards, as well as corporate governance recommendations for listed companies. Based on these regulations, Atria can make responsible business decisions and provide investors with truthful, complete, up-to-date and accurate information about its operations.

Atria's transactions must be accurately recorded in full in the company's bookkeeping. Incorrect entries or entries that are contrary the true nature of the transaction are forbidden.

Confidential information

Atria protects its business secrets and other confidential information and requires its partners to protect them. Atria's employees and partners must not disclose or use confidential information without consent.

Protection of the company's property

Atria protects the company's financial, tangible and intangible property. The company's property must only be used to achieve the company's business goals. The use of Atria's property for personal purposes or to damage the company is forbidden.

Conflicts of interest

Employees must be loyal to Atria in all of their operations. A conflict of interest arises whenever an employee or one of his/her related parties has a personal, financial or other interest that conflicts with the interests of Atria. The employee must notify Atria of any conflicts of interest beforehand, prior to progressing any further in the matter and take action to solve the conflict.



Additional information and notification of breaches

If Atria's employees have doubts about the interpretation of Atria Code of Conduct, they must contact their supervisor or the Legal Department.

Atria's employees must notify their supervisor if they suspect that Atria Code of Conduct has been breached or that the company's conduct has been unlawful. Any breaches can also be reported by email to compliance@atria.com or by post to Atria Plc, Legal Affairs, P.O. Box 900, 60060 ATRIA.

All notifications of breaches will be handled as confidentially as possible, and Atria will take the necessary measures based on the notifications.

Consequences

Any breach of Atria Code of Conduct will be subject to appropriate consequences, which may also include termination of an employee's contract.

Atria requires that its partners follow its Code of Conduct in their operations. Any breach of these principles may lead to cooperation being discontinued or to other consequences.

If the breach is unlawful, the case can be referred to the relevant authorities for further investigation.

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