

Ponsse's Code of Conduct for dealers and contractual service partners

Ponsse wants to be the preferred partner in sustainable forestry. It seeks to produce sustainable solutions for the benefit of its customers and the environment.

Ponsse is committed to conducting its business in a sustainable and responsible manner, taking into account social, environmental and economic responsibility, as well as good corporate governance. Ponsse's Code of Conduct applies to all persons working in the Group and, as applicable, to external people, companies and communities closely associated with Ponsse when they act with or on behalf of Ponsse. The Code of Conduct is based on company's goals, good corporate governance and its values: we truly care; we work for our customers; we are true honest; and we are open for renewal. The Code of Conduct is a common set of rules that guides everyday actions and choices and strengthens Ponsse's corporate culture and cooperation.

As sustainable and responsible business is of paramount importance to Ponsse, it wants to cooperate with partners who are committed to similar principles. This Code of Conduct applies to Ponsse's dealers and contractual service partners, who are Ponsse's key partners and who Ponsse requires to act sustainably and responsibly, taking into account the requirements of this Code of Conduct. This Code of Conduct is based on Ponsse's Code of Conduct, which Ponsse complies with in its own operations.

The local operating environment or legislation may require compliance with guidelines that are stricter or more detailed than this Code of Conduct, in which case they must always be followed. Responsible business conduct is always based on compliance with law and international sustainability benchmarks, including international human rights. Responsible conduct is open, honest and trustworthy. Responsible business means a commitment to sustainable business development and continuous improvement including the involvement of key stakeholders. Responsibility is also reflected in the selection of partners and customers. Ponsse requires that its products and related maintenance services are not sold to customers who show clear disregard for responsible conduct.

Corporate sustainability expectations for an organisation are influenced by the size of the company. Larger companies are expected to take more concrete steps to ensure sustainability. The actions required of a company are also influenced by its leverage. A company has direct influence on its own activities and must use its influence with the partners in its value chain to ensure responsibility.

The following sections specify the conduct Ponsse requires of its dealers and contractual service providers in the three areas of sustainability.

Social responsibility: Treating people well

Social responsibility is taking responsibility for people and treating people well. It is responsible to treat people with respect in all situations and stakeholder relationships. For example, regarding own work community, social responsibility applies to all in the work community, regardless of their status (owners, employees, supervisors, etc.).

1.7.2025

Social responsibility is based on corporate human rights responsibility, which means respecting internationally recognised human rights in business. In practice, companies take adequate measures to ensure that their activities and value chains do not have negative impacts on people and human rights that protect people. Human rights that are impacted by business activities depend on the industry and the products. Risks are also affected by the country in which the business is conducted.

The content of corporate human rights responsibility is specified in the UN Guiding Principles on Business and Human Rights, which define globally accepted expectations on human rights responsibilities for companies of all types and sizes.

As part of its social sustainability, Ponsse requires its dealers and contractual service partners to respect human rights in accordance with the UN Guiding Principles.

Corporate human rights responsibility draws attention to four key stakeholder groups: own work community; customers and end users; employees in supply chains; and people in nearby communities.

Important practices related to key stakeholders include:

Own work community: Creating a caring working environment

- Valuing all members of the work community and everyone's contribution. Taking responsibility for one's own work and for other people.
- Valuing diversity in the work community, diverse characteristics, backgrounds, views and skills.
- Treating all people equally without discrimination including in recruitment. Not discriminating against i.e. treating less favourably because of personal characteristics, such as sex, gender, age, origin, nationality, language, religion, beliefs, opinions, political or trade union activities, family status, health, disability, sexual orientation or other status.
- Behaving in a manner that does not place anyone's mental or physical safety at risk. Prohibiting inappropriate or threatening behaviour, bullying and harassment (including sexual harassment).
- Ensuring that everyone in the work community feels valued, can and dares to express themselves and show their true identity.
- Prohibiting child labour, and protecting young workers (under the age of 18) in compliance with law and international human rights norms. Work must not jeopardise the schooling, development and health of minors.
- Ensuring occupational safety and employee wellbeing by occupational safety and health instructions and compliance with them, using protective equipment appropriate to the situation, and applying work ergonomics protecting health.
- Recognising everyone's right to join or not to join a trade union, and treating everyone fairly without any discrimination, regardless of whether they are unionized or not. Respecting the right to peaceful and statutory negotiations e.g. on employment, working conditions and wages.

1.7.2025

- Recognising the importance of work-life balance by ensuring reasonable working hours as well as sufficient rest and holiday periods.

Customers and end users: Ensuring product safety and customer-driven operations

- Ensuring that customers are provided with sufficient information about the safe use of products.
- Respecting customers and valuing their views as the best experts in their business.

Employees in the supply chain: Using the leverage to protect employees

- Acquiring sufficient knowledge of the supply chain, including its structure and the main human rights risks associated with the employees in the supply chain.
- Ensuring that human rights are respected using the means available in procurement (including partner selection, agreements and cooperation).

People in nearby communities: Preventing negative impacts

- Ensuring that company's activities do not cause harm for example to people staying, moving or living in the vicinity of its premises.
- Identifying and minimising the impact of potential environmental damage on people and human rights, for example the use of Ponsse's machinery in locations or in ways that may have negative impacts on the environment, people and human rights.

Environmental responsibility: Developing and managing business with the environment in mind

Ponsse requires its dealers and contractual service partners to comply with environmental regulations and be environmentally responsible. Preventing and reducing the negative impact of business activities on the natural environment is an integral part of environmental responsibility.

In practice, dealers and contractual service partners must identify, and be aware of, the impacts and significance of their actions on the environment and people. The reporting of impacts and the measures taken on the basis of them must be truthful and transparent towards the authorities, Ponsse and other stakeholders.

Ponsse requires its dealers and contractual service partners to be proactive in conserving the environment and avoiding harm to the environment. Measures to save energy, material and natural resources must be preferred. In decision making, attention must also be paid to activities that have an impact on climate change, biodiversity and natural resources (e.g. energy and water resources).

1.7.2025

Economic responsibility & good corporate governance: Creating an ethically sustainable business environment

Ponsse requires its dealers and contractual service partners to always operate ethically and fairly. This stands for openness, honesty and fairness in all operations.

Dealers and contractual service partners must comply with laws and regulations applicable to anti-corruption, international trade and exports. Dealers and contractual service partners must avoid all types of unethical or illegal activities that could distort competition and jeopardise the business. Dealers and contractual service partners must act in a way that earns the trust of its stakeholders, including its partners and customers.

Corruption and bribery

Corruption means unethical conduct which is damaging and unfair in society. Conflicts of interest and favouritism are among the forms of corruption. Bribery is a form of corruption which involves offering, promising or accepting financial or other benefits. Its purpose is to unfairly promote business, secure favourable decision by authorities or gain other advantages.

Ponsse requires its dealers and contractual service partners to refrain from activities that may be considered corruption. Dealers and contractual service partners must not offer or accept bribes or other similar payments, directly or through intermediaries, for the purpose of maintaining or securing business.

Gifts and hospitality

Hospitality and occasional gifts are in some cases part of normal business conduct but must not be used to influence the recipient's judgment or decision making. Gifts must be ethically appropriate and not place the recipient in a debt of gratitude.

Conflicts of interest

Ponsse requires its dealers and contractual service partners to avoid situations where personal interests may be in conflict with the interests of the company. A conflict of interest arises when personal interests conflict with professional obligations or company's interests. This can impair person's ability to make impartial decisions.

Money laundering and trade sanctions

Ponsse requires its dealers and contractual service partners to refrain from any business and customer relationships that finance terrorism, war or criminal activities in any way. Dealers and contractual service partners must know their customers and partners and verify the origin and legality of funds if there is any suspicion of money laundering, war financing or other criminal activities.

Dealers and contractual service partners are required to comply with international trade laws and international sanctions, as well as to refrain from conducting business with countries, persons or entities subject to sanctions. Ponsse's dealers and contractual service partners must comply with the sanction guidelines specified by Ponsse regarding Ponsse's products and services and refrain from selling products and services to any entity subject to sanctions.

1.7.2025

Fair competition

Ponsse requires its dealers and contractual service partners to comply with antitrust and competition laws and ensure that operations are based on free and fair competition. Dealers and contractual service partners must not share any customer information with competitors or enter into agreements that raise prices or distort competition.

Confidentiality and non-disclosure

Ponsse requires its dealers and contractual service partners to handle Ponsse's confidential business information, as well as personal and business information related to its own activities, confidentially and only on legitimate grounds and with appropriate due diligence. Dealers and contractual service partners must comply with good personal data processing and data protection practices, and take into account data protection requirements in accordance with applicable legislation for the own work community, customers and partners.

Material and immaterial assets

Ponsse requires its dealers and contractual service partners to respect material and immaterial assets and ensure proper handling of economic assets. Dealers and contractual service partners must respect intellectual property rights and only use them in accordance with agreements and valid law.

Implementing the Code of Conduct and reporting any concerns

Compliance with these ethical guidelines is ensured, in part, through the following measures:

- Ponsse's dealers and contractual service partners (including their employees) must complete training on this Code of Conduct and any related refresher training.
- Dealers and contractual service partners (including employees) must address any misconduct or shortcoming in their operations and any failure to comply with this Code of Conduct.
- Reporting concerns:
 - Dealers and contractual service partners must have an appropriate reporting channel and process to enable stakeholders to report any concerns related to the activities of dealers and contractual service partners and to process notifications appropriately.
 - Dealers and contractual service partners must notify Ponsse without undue delay if there is any suspicion in its business activities breaching this Code of Conduct.
 - Notifications concerning Ponsse's partner network can also be made directly to Ponsse under one's own name or anonymously through Ponsse's ethical whistleblowing channel. Ponsse also expects its stakeholders to provide notifications of concerns regarding Ponsse's operations. Notifications are investigated confidentially and impartially by Ponsse's whistleblowing team. More information and a link to the whistleblowing channel maintained by Ponsse's external partner are available on Ponsse's website.
 - No adverse consequences must be resulted to the persons submitting notifications in good faith.

Updating the Code of Conduct and further information

Ponsse Plc's Leadership Team approved this Code of Conduct on 24 February 2025. The company's managers will review the content of this Code of Conduct regularly and update it as required to ensure that the Code of Conduct represents best practices and responds to any changes in Ponsse's business operations and operating environment.

If you have any questions about the interpretation of or compliance with this Code of Conduct, contact Ponsse's Area Management or Ponsse Leadership Team.

This Code of Conduct is based on Ponsse Plc's own ethical guidelines approved by the Ponsse Plc Board of Directors on 21 October 2024.

Vieremä, 24 February 2025
Ponsse Plc's Leadership Team