



Helsinki Mills

EST. 1934

HELSINKI MILLS SUSTAINABILITY REPORT 2025

Sowing seeds of good



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HELSINKI MILLS IS A FINNISH FAMILY BUSINESS

Helsinki Mills is over 90-year-old Finnish family business that manufactures high-quality cereal grain products for consumers, professionals, and the food industry, for both domestic and export markets. The extensive Myllärin product range offers options for all meals of the day, including organic and gluten-free products.

The main raw material for our products is domestic, locally grown cereal. We focus on high quality and safety throughout the production process. We have three laboratories, one of which is reserved for the control of gluten-free products.



CEO'S REVIEW

Responsibility has been at the heart of our family business from the very beginning. As a Finnish family business now in its 92nd year, we are looking far into the future and want to do our bit to ensure that the Finnish food supply chain remains viable for generations to come.

In 2025, the grain we processed was entirely domestically sourced, and 99 per cent of the raw materials we used were of domestic origin. We continued to develop our farming practices in collaboration with our contract farmers and expanded the Farming Programme 2.0 from oats to wheat. The aim of the programme is to produce a good harvest with a lower environmental impact and to improve soil structure and microbial activity.

Looking after people is also a form of being responsible. We want to provide a safe, supportive and inclusive working environment where everyone can develop and succeed. I am delighted that our eNPS, which measures our staff's willingness to recommend the company to others, has risen from 12 to 25.

In terms of environmental responsibility, we focus in particular on improving the energy efficiency of our operations, the sustainable use of raw materials, and reducing the climate impact of our value chain. We calculate our emissions every year and strive to reduce them further.

I would like to thank our staff, our customers, our farmers, our partners, and our other stakeholders for the past year. Responsibility stems from cooperation and from actions, both big and small, which together help to build a more sustainable food system and promote well-being.

Niklas Kumlin, Family Business Owner, CEO





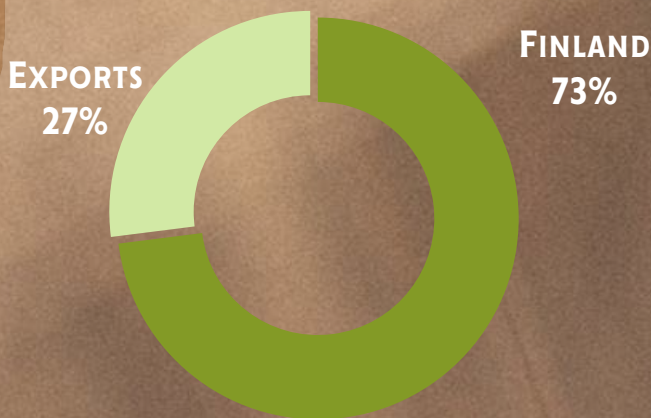
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HELSINKI MILLS KEY FIGURES 2025

TURNOVER € **55.4** MILLION

BALANCE € **30.6** MILLION

DISTRIBUTION OF TURNOVER



EXPORTS TO NEARLY
50 COUNTRIES AROUND THE WORLD

OUR BASIC RAW MATERIAL IS LOCALLY GROWN FINNISH GRAIN.

THE GRAIN WE PROCESS IS

100% FINNISH.

THE DOMESTIC CONTENT OF THE RAW MATERIALS WE USE IS

99%

NACE classification code:
10610 Manufacture of grain mill products



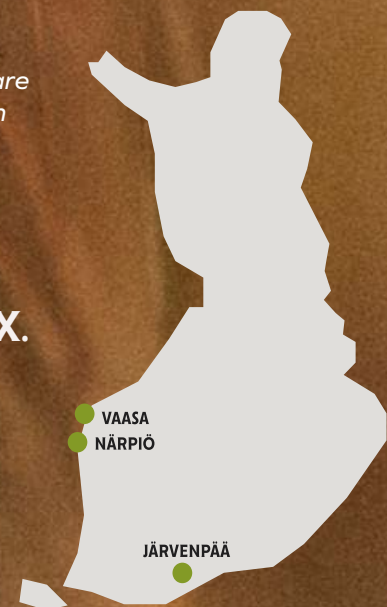
OF OUR CONSUMER PRODUCTS

33% ARE ORGANIC
26% ARE GLUTEN-FREE
41% CARRY THE HEART SYMBOL

100% OF OUR ASSETS ARE LOCATED IN FINLAND. IN 2025 WE PAID 186,000* EUROS IN TAXES AND INVESTED 755,000 EUROS.

**The figures relate to the entire Group from 2025 onwards and are not comparable with figures from previous years.*

WE EMPLOY APPROX.
100 PEOPLE
IN 3 LOCATIONS
JÄRVENPÄÄ,
NÄRPIÖ AND
VAASA





MEMBERSHIPS AND CERTIFICATES

We have been awarded the International Food Standard (IFS) certificate in 2021. The internationally recognised and GFSI-approved food safety standard is proof that our food manufacturing process is safe and our quality control works. The certificate is audited annually.

Since 2017, we have been a member of the global Sedex organisation, which works to ensure responsible and ethical trading and supply chains.

We also have Organic, Kosher and Halal certificates.





OUR SUSTAINABILITY POLICY

Helsinki Mills develops, manufactures, and markets cereal-based foods and their raw materials. We do this in a way that respects the principles of sustainable development, whilst respecting the environment, people and society.

Our sustainability policy is based on the UN Sustainable Development Goals (SDGs). Helsinki Mills also has a quality and management system in accordance with the international IFS standard and we are committed to continuously improving our operations when it comes to environmental, health and safety matters. We comply with all local, national and international regulations and agreements that apply to our operations.

In our sustainability programme, we aim to focus on actions and choices that genuinely matter on the scale of our operations and that we can influence. The three cornerstones of our sustainability programme are the environment, procurement and people.

As raw materials, we use almost exclusively renewable natural resources: cereal grain and other plant-based ingredients. When selecting packaging materials, we always strive for the best solutions and recyclability from the environmental point of view.

We prefer domestic cereals to imported cereals, and when it comes to the supply of cereals, priority is given to domestic cereals whenever there is sufficient supply. With our contract farmers, we follow a farming programme that aims to achieve the best cultivation techniques in terms of yield levels, minimize the environmental footprint and promote biodiversity. We aim to promote organic production in a market-oriented manner.

When selecting partners, we value companies, communities, and individuals that are aware of sustainability.

We develop and market products and methods that are safe to use, healthy, environmentally friendly, and less harmful to society.

When designing production processes and developing products, we take health, safety, and the environment into account throughout the product's entire life cycle. We strive to use raw materials, other materials and energy sparingly and to reduce the amount of waste and emissions generated in both production and transportation. We make full use of raw materials.

We communicate openly and honestly about the environmental, health and safety impacts of our operations. Our cooperation with authorities and stakeholders is based on trust and long-term commitment. We train and encourage our staff to work in a way that makes them feel responsible for the environmental impacts of their actions and that promote safety, health and environmental protection.

Energy consumption is considered a significant environmental aspect and we strive to favour renewable energy sources even when they are not cost-effective. The inedible side stream generated in production is utilized in the production of thermal energy and as feed and fertilizer. The process steam for our flaking mill is produced entirely by burning our own side streams instead of oil.

Helsinki Mills does not have its own transport equipment to deliver raw materials to factories or to deliver products from factories. We buy the transports as a service and try to minimize their environmental impact. Goods are mainly transported by road and by sea across the oceans.



HELSINKI MILLS SUSTAINABILITY PRIORITIES*

The sustainability umbrella pledge:

**We offer healthy and sustainable
plant-based food solutions for a variety of diets.**

13 CLIMATE
ACTION



**Environment
– towards a more
sustainable food system**

We ensure that farming will still
be possible in
100 years' time.

12 RESPONSIBLE
CONSUMPTION
AND PRODUCTION



**Procurement
– sustainable
raw materials**

We ensure the sustainability of
the procurements related to
the manufacturing of our
products.

8 DECENT WORK AND
ECONOMIC GROWTH



**People and society
– a healthy person and a
healthy lifestyle**

We ensure responsible human
resources policies and
management.

2 ZERO
HUNGER



Our aim is to work with our value chain to chart a course that will enable us to reduce emissions in line with the Paris Agreement by 2034.

That same year, Helsinki Mills will celebrate its 100th anniversary.



HIGHLIGHTS IN 2025

Environment

– towards a more sustainable food system

- ✦ The Vaasa production plant has joined the national Energy Efficiency Agreement. Under the agreement, we are committed to improving the energy efficiency of our operations by more than 11% by the end of 2035.
- ✦ The backup power plant at the Vaasa bioenergy plant was upgraded so that, in the event of a disruption at the plant, we can use renewable fuel oil instead of conventional fuel oil.
- ✦ We received carbon footprint calculations from four of our contract farmers to verify the impact of our sustainable farming programme.
- ✦ Myllärin Wheat Flour 2.0, produced in accordance with the measures set out in the Farming Programme 2.0, was launched for consumers

Procurement

– sustainable raw materials

- ✦ 99% of all raw materials are sourced domestically
- ✦ All our suppliers have signed our Code of Ethics
- ✦ Emissions from transport fell by 10%

People and society

– a healthy person and a healthy lifestyle

- ✦ The response rate for our staff survey was 100% for the second year running. The eNPS recommendation index improved and now stands at 25 (12 in 2023)
- ✦ The proportion of 'Heart Symbol' products in Myllärin's consumer goods range has increased and now stands at 41 per cent
- ✦ Well-being at work was promoted by offering staff dental benefits
- ✦ We made a donation of EUR 10,000 to Save the Children from our positive result
- ✦ The Myllärin brand was once again ranked among the top 10 most sustainable food brands in the Sustainable Brand Index 2025 survey and ranked 21st among all brands.



OUR SUSTAINABILITY ACTIONS OVER THE YEARS

1934

- Helsingin Mylly Oy's operations start. We produce plant-based food with Finnish cereal grain as the main raw material.



1997

- We started producing organic products almost 30 years ago.
- In 2025, organic farming accounted for 24% of our turnover.

2010

- We chose an environmentally friendly form of energy and since then all our production plants have used green electricity.

2013

- Our own bio power plant was completed in Vaasa. The thermal energy required by the mill is produced from oat husk waste generated in production.

2019

- We calculated our carbon footprint (Scope 1 & 2) for the first time.

2021

- For the first time, we calculated a product-specific carbon footprint for Myllärin Organic Fiber-rich Oatmeal product.

2022

- The first oat crop grown according to the sustainable farming programme was harvested.
- We launched new Finnish oat products, which can be used in cooking as an alternative to rice.

2025

- We launched Myllärin 2.0 Wheat Flour for consumers.
- We received carbon footprint calculations from four of our contract farmers to verify the impact of our farming programme
- The Vaasa production plant has joined the national Energy Efficiency Agreement.
- The proportion of 'Heart Symbol' products in Myllärin's consumer goods range has increased to 41 per cent.



2024

- We launched Myllärin 2.0 Oatmeal for consumers.
- We expanded our sustainable farming programme to wheat.
- We started preparing for the extension of reporting obligation (CSRD).
- We invested in new sifter cabinets at the Järvenpää factory.
- We switched to using FSC-certified cardboard for our packaging.

2023

- We calculated scope 3 emissions from our own operations for the first time.
- The growing season of the first Oats 2.0 cereal in Ilmajoki.
- The Myllärin brand was included in the Sustainable Brand Index for the first time and ranked 19th.





RISKS AND OPPORTUNITIES

In 2024, we conducted a Double Materiality Assessment (DMA) to get to know our stakeholders, assess the most relevant risks and opportunities for our company's operations based on science, and assess the impact of our own operations on our environment. The DMA was prepared in accordance with the ESRS standard.

The DMA allowed us to consult our main stakeholders: customers, staff, and farmers. We received important information from our stakeholders on the most relevant sustainability themes related to the environment, both social and administrative responsibility (ESG).

We assess the impact of climate change on our operations through the risks and opportunities it brings. Global warming affects the length of the growing season, but unpredictable winters and weather variations also bring risks.

In the future, for example, wheat can yield profitable harvests in an increasingly large area of Finland, but pests also enjoy the rainfall and warming climate. The impacts of climate change on agriculture in Finland are essential to the operating conditions* of Helsinki Mills.

In addition to climate change mitigation and adaptation water, air and soil pollution, loss of biodiversity and the impact of activities on ecosystem services were also highlighted as important environmental themes in the analysis.

Based on our analysis, we plan to clarify the spearhead of our environmental strategy and select our most important development targets related to the climate and the environment. The company's top management is committed to environmental responsibility and takes the risks and opportunities of sustainability into account in the business strategy.

Among the themes of social responsibility, the impacts and risks to one's own workforce and working conditions as well as to the safety of consumers in the form of product safety were highlighted. We will continue to invest in occupational safety matters and maintain the high quality of our products and operations.

We identified impacts and risks related to our company's other operations, such as procurement and administration, especially regarding transport emissions, value chains of purchased raw materials, and procurement. Among the opportunities we identified were specialisation in oat products and responsible cultivation, as well as an transparent sustainability reporting culture.

We ensure that all our suppliers are committed to our updated Code of Ethics. We continue to work transparently and report extensively on our sustainability work in accordance with our stakeholders' expectations and to develop our own operations in an increasingly sustainable direction. We are committed to continuously developing our products, operations and production facilities to reduce environmental impacts and optimize the use of natural resources.

(*Source: Natural Resources Institute Finland)

ENVIRONMENT



CARBON FOOTPRINT OF OUR OWN OPERATIONS

(SCOPE 1 AND 2)

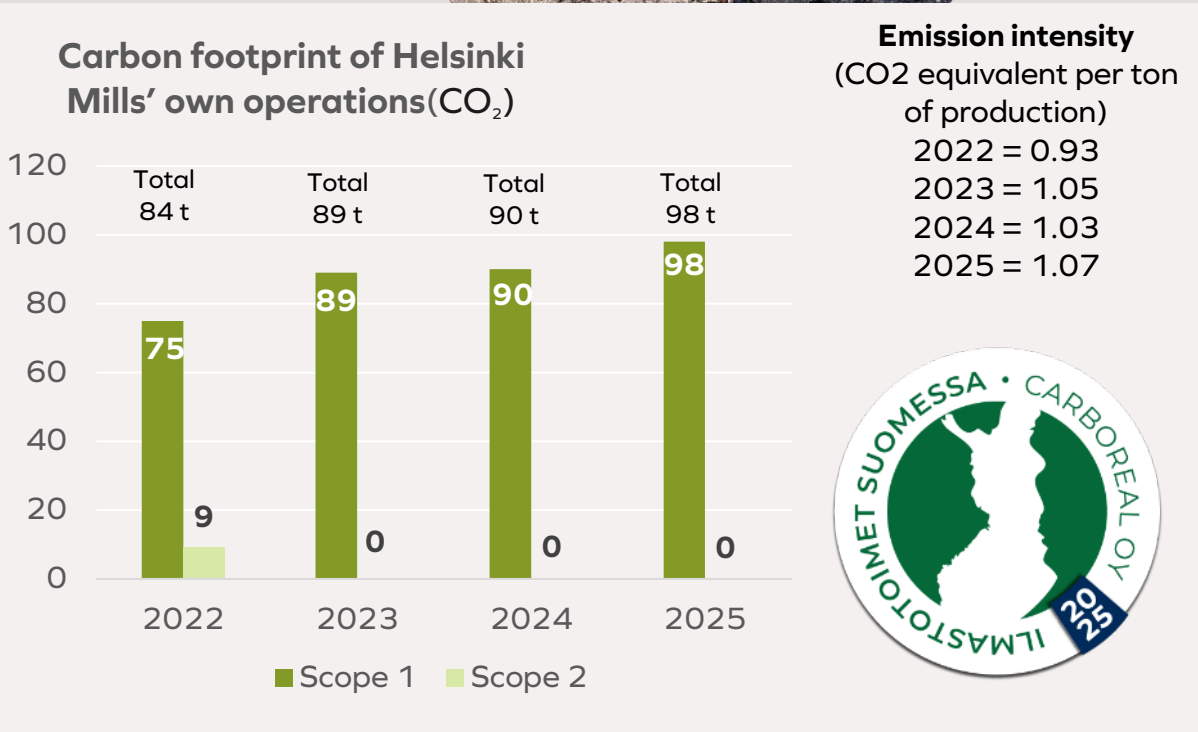


In 2025, the carbon footprint caused by our own operations (scope 1 and 2) totalled 98 tons. In total, it comprised scope 1 emissions (97,718 kg CO₂), which were generated by refrigerant top-ups for cooling equipment, our own energy production and logistics using vehicles under our control.

We have identified our largest sources of emissions and continue to take measures to reduce them. In 2025, the majority of our Scope 1 emissions will come from refrigerant top-ups in refrigeration equipment. The second-highest level of emissions were generated from business trips made with leasing cars that run on fossil fuels.

In previous years, the majority of our emissions have come from the backup fuel oil used at our bio power plant. In 2025, we switched from backup fuel oil to bio-oil, which reduced emissions from our own energy production by over 70 per cent. Overall, emissions relative to production (emissions intensity) remained at almost the same level as in previous years.

Scope 2 emissions did not occur at all, as we only use renewable electricity and district heating. Although the purchased energy did not cause us direct scope 2 emissions, we are aware of the associated indirect scope 3 emissions. That is why we are constantly investing in improving energy efficiency. In 2026 an improvement investment related to ventilation and heat recovery is going to be launched in Vaasa.



We offset our scope 1 and 2 emissions for 2025 by reforesting peatland that was no longer being used for agriculture, in collaboration with Carboreal Oy.



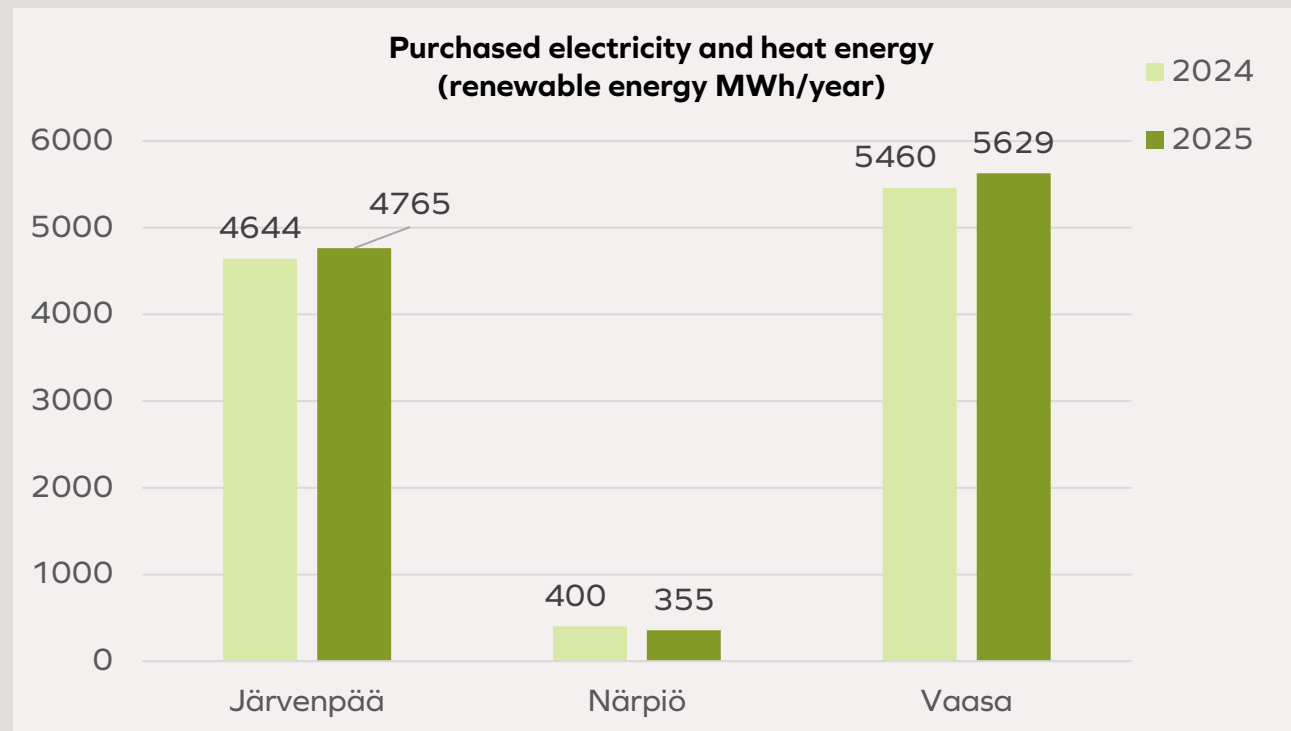
WE USE RENEWABLE ENERGY

All our production facilities have been using green electricity since 2010. The electricity we purchase is certified as 100 per cent renewable energy.

We are constantly investing in improving our energy efficiency. We update our equipment and energy solutions in our properties and develop our everyday operating methods.

In 2025, Helsinki Mills' Vaasa production plant joined the national Energy Efficiency Agreement. Under the agreement, we are committed to improving the energy efficiency of our operations by more than 11% by the end of 2035.

We generate the thermal energy required for the flaking process at the Vaasa production plant by burning oat husks at our own bio power plant. It is not included in the table below, which only includes purchased electricity and heat.



Our total energy consumption rose by around 2%. The increase is due to a rise in production volumes. In 2025, the purchased energy we consumed totalled 10,749 MWh/year (in 2024 10,504 MWh.)



VALUE CHAIN EMISSIONS

(SCOPE 3)

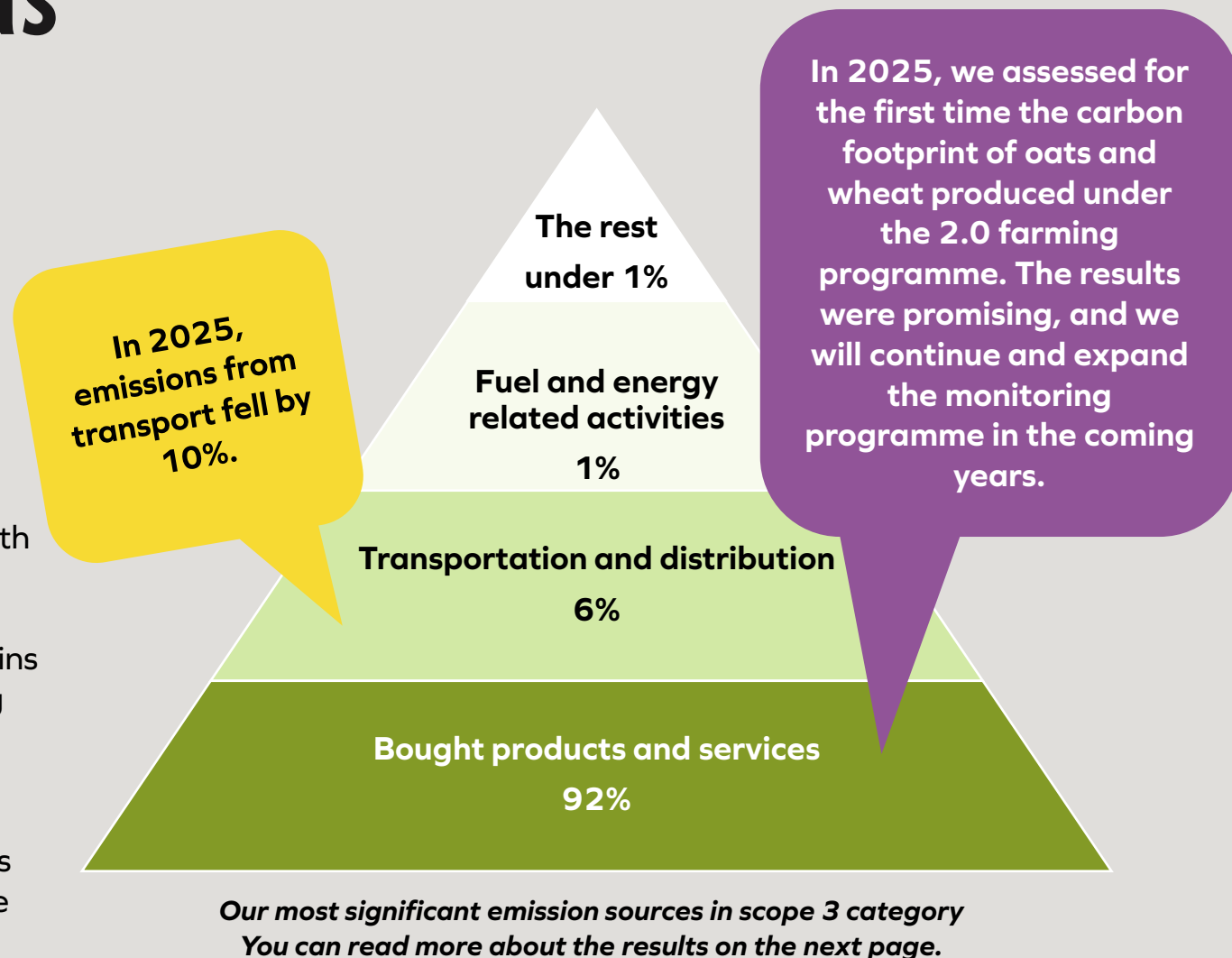
We calculate our scope 1 and 2 emissions annually and scope 3 emissions every three years. The latest scope 3 calculation (from 2023) showed that most of the climate impacts of our operations arise at the beginning of our value chain, i.e. in primary production.

Scope 3 emissions represent the most significant share of our total emissions and therefore also have the greatest emission reduction potential. Our aim is to work with our value chain to chart a course that will enable us to reduce emissions in line with the Paris Agreement by 2034.

In 2023, the largest scope 3 emission sources were cereal grains (85%), logistics (6%), other raw materials (4%) and packaging materials (2%).

We cooperate with actors who have their own climate targets and emission reduction measures. We help to reduce emissions from primary production through our own farming programme by developing farming methods, improving soil fertility and increasing crop yields.

We updated our sourcing principles to ensure that our stakeholders at the start of our value chain also have climate targets and traceable supply chains.





CARBON FOOTPRINT 2023

SCOPES 1-3

We calculate scope 1 and 2 emissions annually,
scope 3 emissions every three years.

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Helsinki Mills has calculated its climate impact by calculating the carbon footprint of its own operations in 2023 in accordance with the GHG protocol.

The aim of the first calculation was to create a clear understanding of Helsingin Mylly Oy's emission sources. In this way, reduction measures can be targeted as effectively as possible in the future.

EMISSIONS IN NUMBERS

50 210

t CO₂e

Emissions for the
whole year

873

t CO₂e

Emissions / milj. €

502

t CO₂e

Emissions / person

HOW MUCH IS ONE TONNE CO₂e EMISSIONS?

- 1 tonne of CO₂e emissions equals ~6798kilometres driven by car.*
- average annual emissions of a Finn are ~10 tonnes of CO₂e. **

Sources: * Liikenne fakta 2021, ** Sitra 2018

SCOPE OF CALCULATION

The calculation takes into account emissions from own operations along the entire value chain (Scope 1, 2 & 3), including the following emission sources:

- In-use emissions from vehicle fuels
- Own energy production

Scope 1

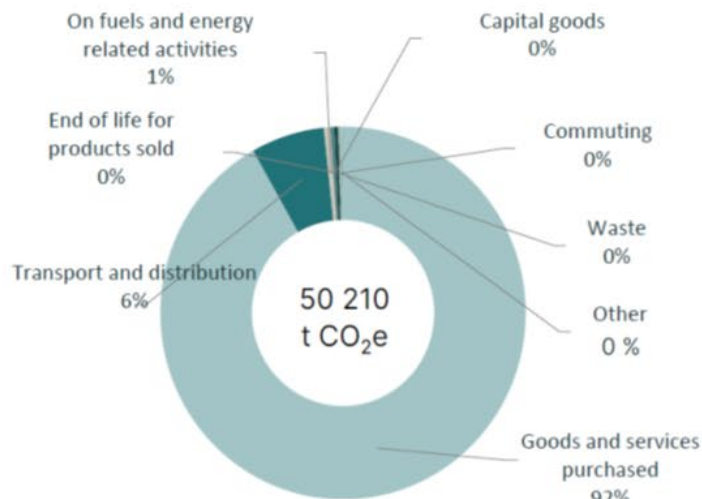
- Electricity
- District Heating

Scope 2

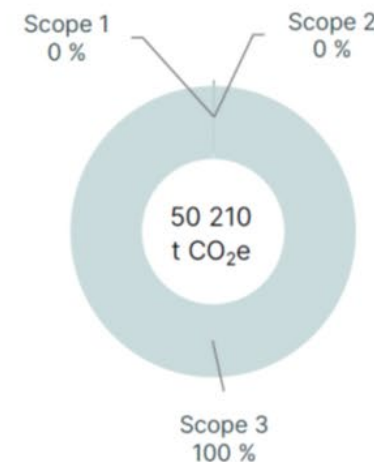
- Goods and services purchased
- Capital goods
- Transport and distribution
- Business travel and commuting
- Waste
- Fuel and energy related activities
- End of life of products sold

Scope 3

EMISSIONS BY SOURCE



EMISSIONS/ SCOPE



GreenCarbon





CIRCULAR ECONOMY AND WASTE

In the milling process, production side streams are generated, for example, from the husking of cereal grains. Most of the streams are used as animal feed, and the oat husks are used as fuel in our own bio power plant, which generates the thermal energy required for the flaking process at the Vaasa production facility.

We deliver about 5 per cent of oat hulls to a fertiliser plant where they are used as raw material for recycled fertilisers. In this way, part of the side stream eventually circulates back to the farmer's field as fertilisers.

Waste from production is sorted and recycled. Waste is generated, for example, from raw material packaging materials, product spills, maintenance work and office waste.

At waste treatment plants, around 54 per cent of our waste has been recycled, and the remainder has been incinerated to generate energy. Waste volume reports still contain a large number of estimated figures in kilograms, but the available data is constantly improving.

Site	Total (t)	Hazardous waste (t)	Non-hazardous waste (t)	Recycled (%)
Vaasa	118 t (108 t)	1.1 t (0.5 t)	116.9 t (107.5 t)	35% (36%)
Järvenpää	58 t (56 t)	0.7 t (0.0 t)	57.3 t (56.0 t)	86% (60%)
Närpiö	28 t (65 t*)	0.0 t (0.0 t)	28 t (65.0 t*)	69% (57%)
All in total	204 t (237 t)	1.8 t (0.5 t)	202.2 t (236.5 t)	54% (46%)

Amount of waste in tonnes per site in 2025. The waste volumes include estimated weights in kilograms. The figure for 2024 is shown in brackets.

**Närpiö's 2024 waste figures were based mainly on an estimate that significantly overestimated the amount of waste. The data collected in 2025 was significantly refined, and the reported volume of waste is now more accurate.*



WATER USE

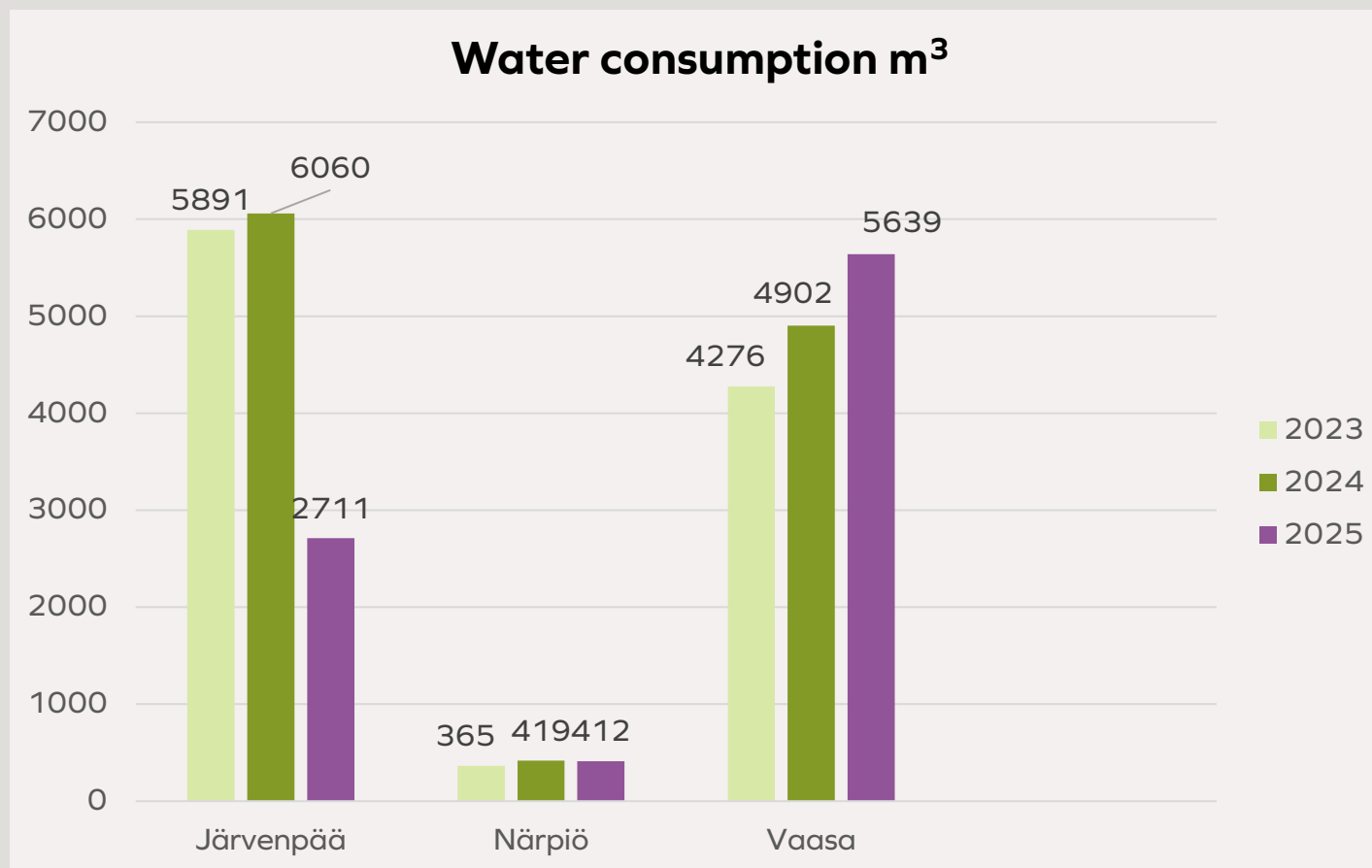
The water consumption of Helsinki Mills is moderate. Water is used to some extent in the milling process, for example for husking grain and steaming the flakes.

The water footprint of Myllärin's cereal grain products is very small, and our production process does not generate wastewater.

At the end of 2024, the Järvenpää laboratory switched to circulation water cooling, which halved water consumption between 2024 and 2025.

Water consumption in Närpiö is low and remained roughly at the same level as in 2024.

In Vaasa, water consumption has risen in line with the increase in production volumes.



PROCUREMENTS



PROCUREMENT AND COOPERATION WITH FARMERS

99% OF OUR RAW MATERIALS ARE OF FINNISH ORIGIN

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- ✦ The cereal grain we processed was 100% Finnish. Overall, grain accounted for 98.6% of the raw materials we purchased (in 2024: 98.4%)
- ✦ 0.2% of all purchased raw materials came from countries we identified as high-risk countries (in 2024: 0.2%)*
- ✦ 1.4% of the purchased raw materials were something else than cereal grains. Some of these, such as fruits and nuts used in muesli, are sourced from abroad (in 2024: 1.6 %)*
 - ✦ For other raw materials:
 - ✦ 36% were acquired domestically and 64% from abroad (in 2024: 37% and 63%)
 - ✦ 100% were sourced from suppliers certified for sustainability or who signed our Code of Ethics (in 2024: 97.6%)
- ✦ In 2022 we launched Farming Programme 2.0:n together with our contract farmers. The programme aims to ensure a good harvest with less environmental impact.
- ✦ Our sustainable farming programme includes 13 oat farmers and 5 wheat farmers. Common goals and new lessons learned have increased enthusiasm and networking among farmers.
- ✦ In 2025, 8 per cent of the grain used by Helsinki Mills was grown in accordance with the measures set out in the Farming Programme 2.0.

99%

**OF OUR RAW MATERIALS
COME FROM FINLAND**



BETTER YIELDS WITH A LOWER ENVIRONMENTAL IMPACT – IMPROVED SOIL STRUCTURE

MANDATORY MEASURES*

1. Targeted fertilisation: the right amount in the right place

The fertilisation needs of the plant are measured with different sensors and fertiliser is applied according to the nutrient requirements.

- ✦ Saves on fertiliser costs, produces better yields
- ✦ The fertiliser goes into the crop and does not leach into the environment



2. Flowering plants in crop rotation: improving the soil fertility of fields

Oil plants and legumes (such as turnip rape and peas) improve soil structure and microbial activity

- ✦ Reduces the need for plant protection products and fertilisers
- ✦ Flowering plants provide food for pollinators



3. Pollinator-friendly pesticides

Only pollinator-friendly pesticides are allowed.

- ✦ Ensures that buzzy bugs can pollinate in peace



Reduced tillage

- ✦ Some fields are lightly tilled, while others have vegetal coverage over the winter. This way, the nutrients do not leach into the environment. Light tilling improves field structure, increases carbon sequestration, field humus content, and small organisms such as worms

Soil analysis

- ✦ Soil scanning helps the farmer to fertilise and lime the field in just the right places.
- ✦ Extensive soil analysis provides information on the status of organic matter in the field and monitors its accumulation and carbon sequestration
- ✦ Nutrient balance calculation provides information on crop efficiency and fertiliser yield response

OPTIONAL MEASURES*



Kari Alasaari, a pioneer in precision farming, acts as the programme's expert.

Farmers' additional efforts are compensated by us paying a premium price for the crop.

**There are three mandatory measures in the programme. In addition to them, one of the four optional measures must be in place during each growing season.*



PACKAGING MATERIALS

98% CERTIFIED CARDBOARD

We started the transition to FSC-certified cardboard in 2023. In 2025, we used 98% FSC-certified cardboard in our cardboard and paper packaging.

The quantities of packaging material used increased across all categories in 2025, which can be attributed to the growth in production volumes.

Packaging material	2023 (t)	2024 (t)	2,025 (t)	Change %
Corrugated packaging	267	261	327	25%
Cardboard and paper packaging	468	562	581	3%
Industrial fibre packaging	161	171	186	9%
Plastic packaging	66	58	66	14%

Volumes of packaging material used, by material type (percentage change compared with the previous year). (Source: RINKI-reporting, excluding export deductions.)



PEOPLE AND SOCIETY



STAFF KEY FIGURES AND OUR PROMISE TO OUR STAFF

In 2025, the Mills employed 101 permanent staff, of whom 34 were women and 67 were men.

The employee turnover rate was 1%.

We train our staff regularly, and it is important to us that our staff develop their careers and know-how. We aim to invest in education regardless of gender and role.

All of our employees received at least the wages stipulated in the collective agreements, and are covered by a collective agreement.

Each of our employees is eligible for performance bonus.

In 2025, one workplace accident was recorded. We were not made aware of a single case of work-related illness.

33% of supervisors are women and 67% are men.
17% of the members of the Executive Board are women and 83% men.
60% of the members of the Board are women and 40% men.

We have not been informed of any cases related to child labour, forced labour, human trafficking, discrimination, or other negative human rights impacts in our own operations. We strive to ensure the implementation of human rights in our own value chain by requiring our own suppliers to sign our Code of Ethics.



OUR LEGACY – HOW DO WE DO GOOD?

We donated Myllärin products to over 2,000 students in collaboration with the student housing foundations in Helsinki, Tampere and Vaasa.

In addition, we donated our products to around 40 events in the towns where our factories are located.

We promote sustainable and healthy eating by offering tasty, high-quality products that are suitable for a wide range of diets.

We are making it easier for people to eat locally produced, plant-based food, and we are raising awareness of the origin of food and fostering a greater appreciation for the environment.

We participated in three business villages, where a total of almost 20,000 sixth-graders learn working life and financial skills every year. At the Mills' booth, young people learn how the food chain works and get to know what a head miller does.



ETHICAL PRINCIPLES



OUR CODE OF ETHICS 1/3

Our Code of Ethics define our company. They are the basis for all our operations and how we meet our customers, business partners and colleagues. The choices we make in everyday life will ultimately determine Helsinki Mills and the issues it represents. Since the company was founded, we have strived for excellence. To achieve this, we need to be a reliable partner for our customers and business partners.

We are committed to creating added value for all our stakeholders based on our values of sustainability, working together and continuity. For this reason, we expect all of us to follow the guidelines set out in the Code of Ethics and to maintain the highest ethical practices in everything we do.

Code of Ethics do not cover all possible situations and do not remove the need for common sense and professional judgement, but as Helsinki Mills ambassadors, it is our responsibility to know and follow the ethical guidelines and to act ethically in all our activities.

Code of Ethics do not replace or override local laws and regulations. They serve as complementary ethical standards and operating principles for all employees of the Helsinki Mills Group.

Scope of Code of Ethics

This Code of Ethics applies to all employees of Helsinki Mills and its Board of Directors. We encourage our business partners to adhere to these ethical guidelines.

1. Legislation and policies

We must comply with all applicable laws, regulations and policies of the Helsinki Mills Group. We operate in several countries, so you must make sure that you are familiar with the laws and regulations related to your work in the country(ies) where you operate. We all have a responsibility to read and internalise the Group's policies and procedures in our own work.

2. Respect for human rights

We conduct business with respect for human rights in accordance with the UN Guiding Principles on Business and Human Rights and the International Labour Organisation (ILO) conventions. We do not tolerate the use of child labour, any form of forced labour or other human rights violations.

3. Respectful and harassment-free environment

We treat people with equal respect and courtesy on the basis of the principle of non-discrimination. Every employee must treat their colleagues with respect and fairness. We do not tolerate any physical, verbal, sexual or psychological harassment, bullying or insulting.

We support diversity of personnel and all decisions concerning individual employees must be made regardless of race, ethnicity, nationality, religion or belief, gender, gender identity, sexual orientation, age, disability, marital or family status or other characteristics. We also recognise and respect our employees' freedom of association and the right to collective bargaining.



OUR CODE OF ETHICS 2/3

4. Health and safety

Humans are what is near and dear to Helsinki Mills' heart. This means that health and safety are always the most important things for us. We are committed to providing a safe and healthy working environment for all employees, business partners and suppliers, and to continuously improving the health and safety matters. Every employee must be familiar with and follow all health and safety rules, policies and procedures in their own work.

5. Fight against corruption and bribery

We are committed to preventing corruption in all its forms. It is forbidden to give or receive anything of value in an attempt to exert undue influence on another person for business or other gain. We do not give or promise money or other valuable assets to the authorities to obtain or maintain business or to obtain any other inappropriate benefit over competitors.

Helsinki Mills also prohibits payments (so-called grease payments) made for the personal benefit of the authority or to ensure or speed up routine operations. When offering or receiving hospitality or giving or receiving gifts, it must always be considered whether it is appropriate, reasonable and justified in the light of the circumstances. Gifts and/or hospitality must never affect or appear to affect the integrity of business decisions or the loyalty of the persons involved.

6. Fair competition

We compete fairly and comply with competition legislation in all our operating markets. The general purpose of competition law is to maintain competition in the market and thus to prevent agreements or arrangements between competitors which restrict competition or otherwise harm consumers. Such harmful conduct may include price fixing, customer or market sharing, abuse of a dominant position or exchange of sensitive information between competitors or indirectly, for example through trade associations. It is our responsibility to understand the requirements of Competition Act related to our daily work, as it is essential that our company and its employees comply with competition laws and regulations.

7. Environmental responsibility

We have an obligation to actively reduce the environmental impacts of Helsinki Mills. We are committed to continuously developing our products, operations and production facilities to reduce environmental impacts and optimise the consumption of natural resources. We respect the environment and take care of it. We actively communicate our environmental performance to stakeholders.

8. Consumer safety and responsible marketing

The health and safety of consumers is never compromised. We will take all necessary measures to ensure food safety. All our products must meet the highest quality and highest standards. We market our products in a responsible way. We are committed to developing new products and services.



OUR CODE OF ETHICS 3/3

9. Respect for privacy

We are committed to ensuring that the personal data of people with whom Helsinki Mills is dealing is protected. We process personal data responsibly and in compliance with laws and regulations in our operating countries. We exercise due caution and legally ensure that sensitive personal information does not become publicly available.

10. Conflicts of interest

All business decisions must always be based on what is objectively in the best interests of Helsinki Mills. The employees and directors of Helsinki Mills are not allowed to make decisions or influence decisions or actions if there are conflicts of interest. Conflicts of interest arise when the interests of private persons, personal relationships or other matters affect or appear to affect decision-making or other activities against the interests of Helsinki Mills.

11. Protection of property

The assets of Helsinki Mills are reserved for use only in the company's business operations. Company property may not be used for personal gain or illegal activity. This applies to physical, intangible, and electronic property such as patents, trademarks, know-how and information systems. We acknowledge that the trademarks and other intellectual property rights of Helsinki Mills constitute a significant part of the company's assets and must be actively protected.

12. Business confidentiality

We must protect and maintain the confidentiality of non-public information that we use in our daily work or that we receive from employees, customers, suppliers and other business partners. Confidential information should only be used for legitimate and appropriate purposes and we do not misuse them.

13. Communication

We work with decision-makers and other organisations, both directly and through industry associations, to develop proposed legislation and other regulations that affect legitimate business interests. We promote openness and transparency, as well as continuous dialogue with stakeholders within the limits of commercial confidentiality. We always communicate honestly.

14. Compliance with trade legislation, money laundering and financial reporting

We are committed to complying with all applicable trade laws and regulations, do not enable money laundering, and do not conduct business with third parties where trade sanctions prevent us from doing so. We do not violate applicable trade sanctions or engage in business activities that expose Helsinki Mills to the risk of sanctions. It is our responsibility to ensure that our financial statements, accounting and public reporting accurately and truthfully describe our events and business.



THE NEAR FUTURE OF OUR SUSTAINABILITY WORK

Our goal is to develop our operations in a more sustainable direction, and to ensure that the steps we have already taken towards a better future are kept up year after year.

Our sustainability work is guided by a separately appointed responsibility steering group. The sustainability programme is created in three-year cycles. In 2025-2027, the programme will focus on three cornerstones: environment, procurement, people and society.

We will continue to reduce our emissions and strive to implement projects every year to reduce our carbon footprint. We aim to report more widely and transparently every year.

Our main objectives include

- ✦ Our aim is to work with our value chain to chart a course that will enable us to reduce emissions in line with the Paris Agreement by 2034.
- ✦ to source cereal grain and other raw materials that are certified as having been grown responsibly from certified suppliers
- ✦ to ensure the work ability, safety, and comfort of our employees.

To help achieve these objectives, we have drawn up an action plan.





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**HELSINKI MILLS
IS A FINNISH FAMILY BUSINESS
THAT FEEDS HAPPINESS
AND SOWS SEEDS OF GOOD.**



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