

# Metsä Conservation Foundation Code of Conduct

Metsä Conservation Foundation sr (“Foundation”) is a foundation engaged on work for the public good, and its purpose is to provide opportunities for the voluntary conservation of sites with high biodiversity value, the environmental impacts of whose use for forestry purposes would clearly differ from normal commercial forests.

The Foundation is committed to this Code of Conduct in all its activities. It also requires its partners and associates to commit to this Code of Conduct or equivalent ethical principles.

Our work is guided by the Foundation’s rules, responsible conduct, sustainability, reliability and transparency. In our work, we always comply with legislation, the Foundation’s rules, good foundation practice, this Code of Conduct and guidelines for good governance. The Foundation must operate with care to promote the achievement of its purpose and interests. We contribute to achieving the UN Sustainable Development Goals.

This Code of Conduct should always be interpreted in good faith and in line with the Foundation’s rules and interests.

## 1. FAIRNESS OF CONSERVATION

Any private sector forest owner in Finland may apply for the conservation of their site. Conservation is carried out all over Finland. The Foundation must ensure that the selection of conservation sites is fair and based on publicly available conservation basis accepted by the Foundation’s Board.

The conservation sites are selected through a predefined process in which the Foundation’s independent Conservation Committee makes a proposal on the sites to be conserved. The fulfilment of the conservation basis for each site is verified via field visit. The Foundation’s Board makes the final conservation funding decisions.

## 2. ENVIRONMENTAL RESPONSIBILITY

Our goal is to protect areas that are valuable to nature, support biodiversity and strengthen the state of nature in Finland.

Strengthening forest biodiversity has a positive impact on the health of forests and their ability to adapt to climate change. We take climate impacts into account in our own activities and strive to promote collaborators’ commitments to common climate goals.

## 3. SOCIAL RESPONSIBILITY

### 3.1 Respect for human rights

We respect human rights in all our activities and do not tolerate any human rights violations. We comply with the due diligence obligation that ensures the implementation of human rights and intervene in any human rights violations we may detect.

We act in accordance with the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We are also committed to ensuring that there are no occurrences of child labour, forced labour, human trafficking or any other form of modern slavery in our operations.

### 3.2 Safety

The proactive promotion of safety and compliance with applicable safety regulations are important. Our goal is zero accidents.

We are all responsible for safety and for promoting an operating culture that fosters accident prevention. We do not hesitate to address any deficiencies and take corrective action if we detect any safety incidents, or risky practices or behaviours.

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### **3.3 Anti-discrimination and equal opportunities**

We promote a culture of diversity, equity and inclusion that values diverse views, backgrounds and expertise. We treat everyone equally, fairly and respectfully, and do not tolerate discrimination in any form.

Discrimination is prohibited on any accounts including gender, age, ethnicity, nationality, language, religion, beliefs, opinions, political activity, family relationships, health, disability, sexual orientation or other personal characteristics.

### **3.4 Harassment-free environment and unacceptable behaviour**

We treat everyone professionally, respectfully and courteously. Our working culture emphasises the importance of cooperation. We do not tolerate sexual or other harassment, insults, bullying, intimidation, threats, exploitation, physical or psychological violence, or other inappropriate behaviour. Such behaviour is never acceptable.

### **3.5 Respect for privacy and confidentiality**

The Foundation is committed to protecting and processing confidential information and personal data related to its activities in accordance with good data processing principles and applicable laws. We respect everyone's right to privacy.

Devices, as well as email, social media and other communication channels, must be used responsibly and in accordance with applicable guidelines.

They must not be used for fraudulent, offensive or illegal purposes. The information may only be used to fulfil the purpose of the Foundation and in accordance with legal requirements.

## **4. RESPONSIBLE GOVERNANCE**

### **4.1 Avoiding conflicts of interest**

In matters of the Foundation, the Foundation's Board of Directors and other members of its administration must always follow the Foundation's rules and act in its interests, avoid and disclose any actual or potential conflicts of interest, and recuse themselves from decision-making in such situations, including situations defined in the Foundations Act.

A conflict of interest arises if the personal interests of a member of the Board of Directors or another person involved in the Foundation's administration, or the interests of their related parties, influence or may influence the Foundation's actions or decision-making in a way that is not in accordance with its rules or interests. Such an interest may be economic or non-economic in nature.

Particular attention must be paid to situations that involve a family member, close relative or another related party. The mere impression of a conflict of interest can have a negative impact on the Foundation's reputation and work. If a conservation decision or a decision about other matters related to the Foundation concerns a related party, the grounds for the decision must be carefully recorded.

### **4.2 Gifts, hospitality and anti-corruption**

In some situations, the interaction between the Foundation and its stakeholders may involve gifts and hospitality. The gifts and hospitality must always be of reasonable value, comply with applicable legislation and be objectively justifiable towards the Foundation's work.

It is prohibited to accept, offer, or promise gifts or hospitality that influence or may influence decision-making, or otherwise violate these principles.

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In some cases, gifts and hospitality may be considered corruption, or they may give rise to conflicts of interest. The Foundation does not tolerate corruption in any form, and any influence over decision-making through inappropriate means is prohibited.

### 4.3 Use of funds and fraud prevention

The Foundation's Board of Directors is responsible for the proper organisation of asset management. It also supervises fundraising and the use of the funds raised for the Foundation's work. The Foundation's funds must be used to promote the purpose of the Foundation and to carry out activities that support it.

The Foundation may accept property and assets bequeathed or otherwise donated by natural or legal persons. At its discretion, the Foundation may also refuse a donation or waive property obtained by will.

The Foundation's funds may be invested in low-risk investments that do not restrict its purpose with a return on assets. Return on assets refers to the economic benefit generated by assets, such as interest income.

Fraudulent activity, misconduct and other dishonest activity are prohibited. Those working for the Foundation must keep their personal finances completely separate from the Foundation's finances. All cases of misconduct will lead to internal actions, and criminal offences will be reported to the police.

### 4.4 Prudent accounting and anti-money laundering

Financial and non-financial disclosures must be presented truthfully and transparently. All financial information must be recorded accurately and in a timely manner in the Foundation's accounts in accordance with applicable legislation and reporting guidelines.

The Foundation complies with applicable money laundering legislation and takes appropriate precautions to ensure that its activities do not involve money laundering.

By nature, the Foundation's work promotes the public good. Any taxes and similar charges potentially related to its activities must be reported and paid in accordance with applicable legislation and in a timely manner.

## 5. RESPONSIBILITY REQUIREMENTS FOR DONORS AND OTHER PARTNERS

The Foundation requires donors, conservation applicants and other partners and associates to commit to this Code of Conduct or similar ethical principles.

We pay particular attention to ensuring that the activities of our partners and donors:

- Are based on honesty, ethics and compliance with the law.
- Demonstrate an open commitment to promoting sustainability and climate goals.
- Do not conflict with the purpose of the Foundation or this Code of Conduct.
- Ensure the realisation of human rights.

We carefully select our partners and conduct the necessary background checks to ensure that we meet the requirements placed on us and operate in accordance with this Code of Conduct.

## 6. REPORTING MISCONDUCT

Violation of this Code of Conduct may result in internal sanctions or termination of partnership. Any illegal activities are reported to the authorities.

We encourage all parties involved with the Foundation to report suspected or detected breaches of legislation, the Foundation's rules



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or this Code of Conduct by email to  
[metsafoundation@metsagroup.com](mailto:metsafoundation@metsagroup.com).

All reports made in good faith will be investigated confidentially, and necessary actions will be taken. The Foundation is committed to protecting the rights and privacy of all individuals who report in good faith and will not tolerate any retaliation against informants.

Espoo, 26 February 2026

**Mikko Mäkimattila**

Chair of the Board of Directors  
Metsä Conservation Foundation sr