



Varte Group Sustainability Policy

Document information

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Document owner: *Arto Jokinen, CEO of Varte Group*

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Rakennamme kuin itsellemme tekisimme.

Scope and Objectives of the Policy

As a family-owned construction company, we operate for the benefit of society while protecting the environment and people. This requires our operations to be open and transparent. In accordance with this principle, we publish the Varte Group Sustainability Policy, to which the company and all its employees, including senior management, are committed. This Sustainability Policy shall be followed throughout the entire Varte Group.

This Sustainability Policy defines Varte's governance principles regarding environmental responsibility, social responsibility, and good governance. The purpose of the policy is to consolidate and communicate Varte's sustainability principles both within the Group and to its stakeholders.

More detailed sustainability targets, metrics, and concrete actions are defined in [Varte's Core Themes of Sustainability Roadmap](#).

Environment (E)

Reducing environmental impacts is a strategically important focus area for us and a key component of the company's corporate responsibility program, as well as an integral part of the annual business planning process. Varte is committed to complying with environmental legislation and regulations. We meet the expectations of our stakeholders and society by continuously assessing and developing our operations in ways that reduce our negative environmental impacts.

Environmental management at Varte is based on a certified environmental management system (ISO 14001), in which environmental risks have been identified and indicators and targets have been established for the identified environmental aspects. The suitability, adequacy, and effectiveness of the environmental management system are evaluated annually through external audits conducted by the certification body and as part of Varte's management review process.

We operate according to the principle of continuous improvement, and environmental considerations are integrated into the company's decision-making processes. We ensure adequate resources and employee training to advance environmental responsibility. We prevent environmental risks by thoroughly investigating environmental observations and incident reports. We communicate regularly about our environmental activities to employees and other stakeholders.

In our operations, we are committed to preventing environmental pollution, combating climate change, promoting resource efficiency and the circular economy, and taking biodiversity into account. Varte identifies and assesses climate-related risks, opportunities, and transition impacts as part of its business operations. We strive to reduce greenhouse gas emissions and other climate impacts associated with construction activities.

Our suppliers of goods and services are expected to operate in compliance with all applicable laws and regulatory requirements. Suppliers must work to minimize environmental risks and impacts within their own operations and supply chains. Varte

encourages its suppliers to implement systematic environmental management in accordance with the principles of ISO 14001.

Progress in environmental performance as part of the Group's sustainability efforts is reported to the Board of Directors. The Board regularly evaluates the relevance of the environmental policy and the effectiveness of its management and implementation.

Social responsibility (S)

Varte respects all internationally recognized human rights. Varte is committed to operating in accordance with the Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child, and the International Labour Organization's fundamental conventions on workers' rights, and expects the same commitment from its business partners.

Varte does not tolerate any form of forced labor, human trafficking, or child labor. Varte has a zero-tolerance policy toward all forms of violence, discrimination, bullying, harassment, and intimidation. All employees of the Group and employees of business partners must be guaranteed equal rights and opportunities.

We provide, and require our partners to provide, a safe and healthy working environment for all employees and subcontractors. Every employee must receive adequate training to perform their duties safely and must be informed of all general safety instructions. Safety-related practices and rules, including the use of required personal protective equipment, must always be followed. We continuously strive to improve occupational safety and reduce accident frequency through ongoing monitoring, regular audits, training, and updates to safety instructions.

Employee well-being forms the foundation for sustainable success and is one of the cornerstones of our business performance. We manage employee well-being based on data and regularly assess its development through indicators such as sickness absence rates and eNPS measurements. Our objective is to support employee well-being, competence development, engagement, and adaptability. We provide opportunities for continuous learning through the Varte Academy and cooperation with educational institutions.

All Varte employees are treated equally, and we ensure equality and equal pay throughout the Group. The Management Team assesses gender pay equality across employee groups twice a year. Equality is also measured through employee surveys. We require, both within the Group and from our business partners, that equal rights and opportunities are guaranteed for all in compensation, recruitment, and career development.

Good Governance (G)

Varte conducts fair, honest, and transparent competition. We comply with all laws, regulations, and international commitments applicable to our business operations and require the same from our business partners. Varte has a zero-tolerance policy toward all forms of corruption, bribery, and extortion.

Varte complies with all applicable trade sanctions, export control laws and regulations, and anti-money laundering legislation, and expects the same from its business partners.

We monitor the sustainability performance of our suppliers and seek continuous improvement in assessing the impacts of our value chain. In addition, Varte conducts project-specific sanctions screening.

Varte aims for profitability and controlled growth in all its activities. The foundation of our growth is maintaining financial solidity and exercising prudent risk management. We also fulfill all statutory sustainability reporting requirements and continuously develop our reporting practices as a growing company.

Practical Implementation, Communication, and Amendments

The Management Team of Varte companies is responsible for communication, training, and practical implementation of this policy throughout the Group. The Group shall ensure that all employees have access to information regarding the Sustainability Policy and its implications for their own work. Every Varte employee is responsible for implementing the requirements of this Sustainability Policy in their daily work.

Any amendments to this policy shall be approved by the Varte Group Board of Directors, except for technical changes that do not materially affect the content of the policy. Such technical changes may be approved by the policy owner. All changes made must be reported to the Board of Directors.

Monitoring Compliance and Consequences of Violations

The policy owner is responsible for ensuring adequate internal controls so that compliance with this policy and any related guidelines, instructions, and processes can be verified. The practical implementation of and compliance with this policy are regularly assessed through audits conducted by internal and external parties.

If any Varte employee acts contrary to this policy, the violation may result in appropriate disciplinary measures, including possible termination of employment. Violations may also be reported to authorities if Varte has reason to suspect that an employee's conduct is unlawful.

Varte maintains a [reporting channel](#) that complies with the GDPR and the EU Whistleblowing Directive, through which individuals may anonymously report suspected or observed misconduct or inappropriate behavior.

Policy Approval and Applicability

This policy is approved by the Board of Directors. Group management and business unit management are responsible for planning and allocating resources for operations in accordance with this policy. Varte requires each employee to take responsibility for their own actions and to comply with this policy and all principles contained herein.