

Code of *Conduct*





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Letter from *our CEO*

Dear team,

Fiskars Group's purpose is to pioneer design to make the everyday extraordinary: for ourselves, our customers, consumers, partners, and other stakeholders. We can achieve our purpose by living our values, taking care of our reputation and our iconic brands, and growing our business sustainably and with integrity. This requires us to be always mindful of doing business the right way.

Sometimes doing the right thing is easier said than done; we might not always be sure what the responsible, ethical or right choice is. Our Code of Conduct is there to help us in these situations. It explains how we can conduct our business the right way and helps us make the right choices.

Remember, there is no right way to do the wrong thing. Although our Code of Conduct makes it easy for you to know your obligations, it cannot anticipate every ethical dilemma you may face. If you ever have questions or concerns, take a moment to speak with your colleagues, manager, or HR partner. You are also welcome to contact any member of our Legal and Compliance Function or use our anonymous Ethics and Compliance Helpline to report violations or any other kind of misconduct.

I appreciate your commitment to our Code and to grow our business responsibly, every day.

Nathalie



Our *Purpose* and *Values*

OUR PURPOSE:

Pioneering design to make the everyday extraordinary

Our values guide our everyday actions as we pioneer design to make the everyday extraordinary. Our Code of Conduct is there to help us stay true to our values by doing business ethically and responsibly.

In short, doing business the right way is our way of doing business according to our values.

OUR VALUES:

Creating change

Growing with compassion

Celebrating the everyday





Our Story

Good design is honest and inspiring. Enriching, self-evident and confident. Good design is innovative, making the product fit for purpose. Good design is captivating, sparking enjoyable moments to remember.

Good design is good business, thoughtful and curious, paying attention to consumers' needs, desires and future dreams. Above all, good design is looking beyond trends to make a lasting impact on people's lives.

At Fiskars Group, we embrace the power of premium design in everything we do, from ideation to manufacturing and business development. Through the combination of craftsmanship, brand passion and digital transformation, we rethink existing solutions while always being loyal to our roots.

Since 1649, we have made life better for each other and the world around us, driving innovation and sustainable growth to challenge throwaway culture through products of timeless, purposeful, and functional beauty.

As a global home of design-driven brands for indoor and outdoor living, we are unified and driven by our common purpose:

*Pioneering design to make
the everyday extraordinary*





Our Code

This Code of Conduct applies to everyone within Fiskars Group, including employees, managers, directors, officers, board members, consultants, and other personnel working under Fiskars Group's direction (referred to in this Code as 'Fiskars Group People') and covers all Fiskars Group's companies worldwide.

Fiskars Group also expects that all of its business partners and customers and their sub-contractors must be governed by the same or similar principles stipulated in this Code.

Fiskars Group's Supplier Code of Conduct communicates Fiskars Group's ethical and sustainability expectations to all our suppliers.

Fiskars Group People are expected to follow not only the Code but also the spirit of our Code of Conduct. Therefore, all Fiskars Group's People must be aware of and conduct their activities in accordance with our Code of Conduct and all supporting Fiskars Group policies, even if they require a higher standard of behavior than is required by national law and local regulations.

We all set an example for each other and our stakeholders by being honest, fair, and respectful.

Knowing our Code of Conduct helps you to decide what is the right thing to do. If in doubt, ask before you act. You are encouraged to consider who has responsibility or control over the issue and who would have the information needed to answer your question. You can contact your manager, global or local HR, or Legal and Compliance (compliance@fiskars.com).

There is no right way of doing the wrong thing.



Speak up!

We at Fiskars Group are committed to conducting our business responsibly. We will speak up against any unethical business practices or misconduct in and around our business.

Violations against our Code of Conduct erode the confidence we have built within our organization and with our shareholders, customers, and other stakeholders. A failure to follow our Code of Conduct may also put yourself, your colleagues, and our business at risk.

Therefore, if you ever have an ethical question or a concern about whether something meets our Code of Conduct, policies, or legal requirements, please reach out to your manager, global or local HR, or Legal and Compliance (compliance@fiskars.com).



If you think there has been a violation of our Code of Conduct, you are expected to report any suspected violations without delay.

If you prefer, you can remain anonymous by using [Fiskars Group Ethics and Compliance Helpline](#). You can report any violation completely anonymously in writing or orally.

HELPLINE (ONLINE)

Preferred way of reporting for Office employees and employees with computer/internet access:

You can access our Ethics and Compliance Helpline through our intranet page or directly from any internet-connected device at <https://report.whistleb.com/en/fiskars>. The Helpline is available in all Fiskars Group languages.

HOTLINE (TELEPHONE)

Preferred way of reporting for employees without access to a computer/internet:

For our employees without easy access to a computer/internet (e.g. employees located in Manufacturing Units and Distribution Centers), we also offer a toll-free Ethics and Compliance Hotline that you can reach by phone.

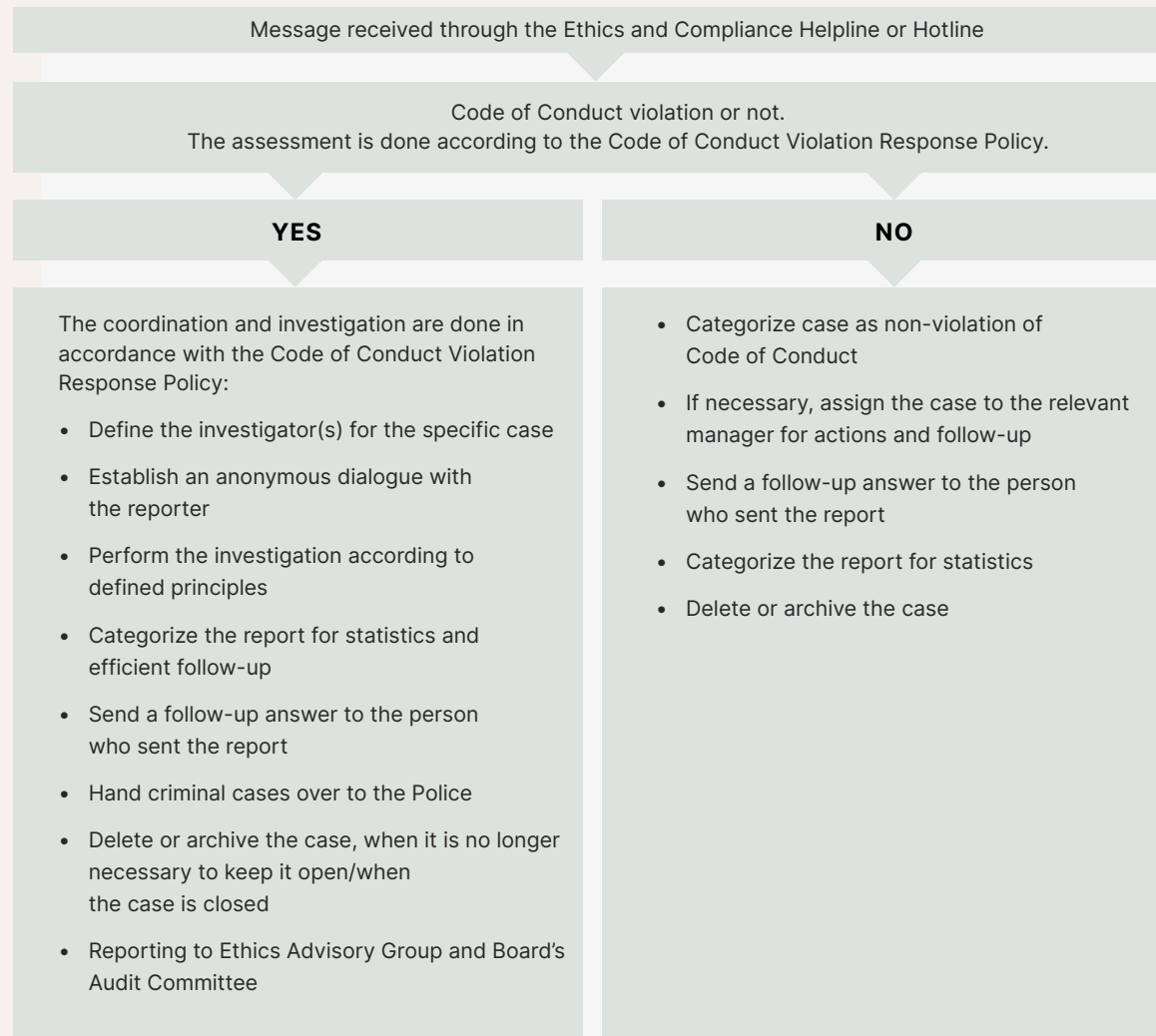
You can find the toll-free hotline numbers from your workplace premises (e.g. the notice board) or ask your manager, global or local HR, or Legal & Compliance (compliance@fiskars.com). The Hotline numbers are also published in our [intranet](#).

You will remain anonymous throughout the process and even after the case is closed.





ETHICS AND COMPLIANCE HELPLINE / HOTLINE – CASE HANDLING PROCESS

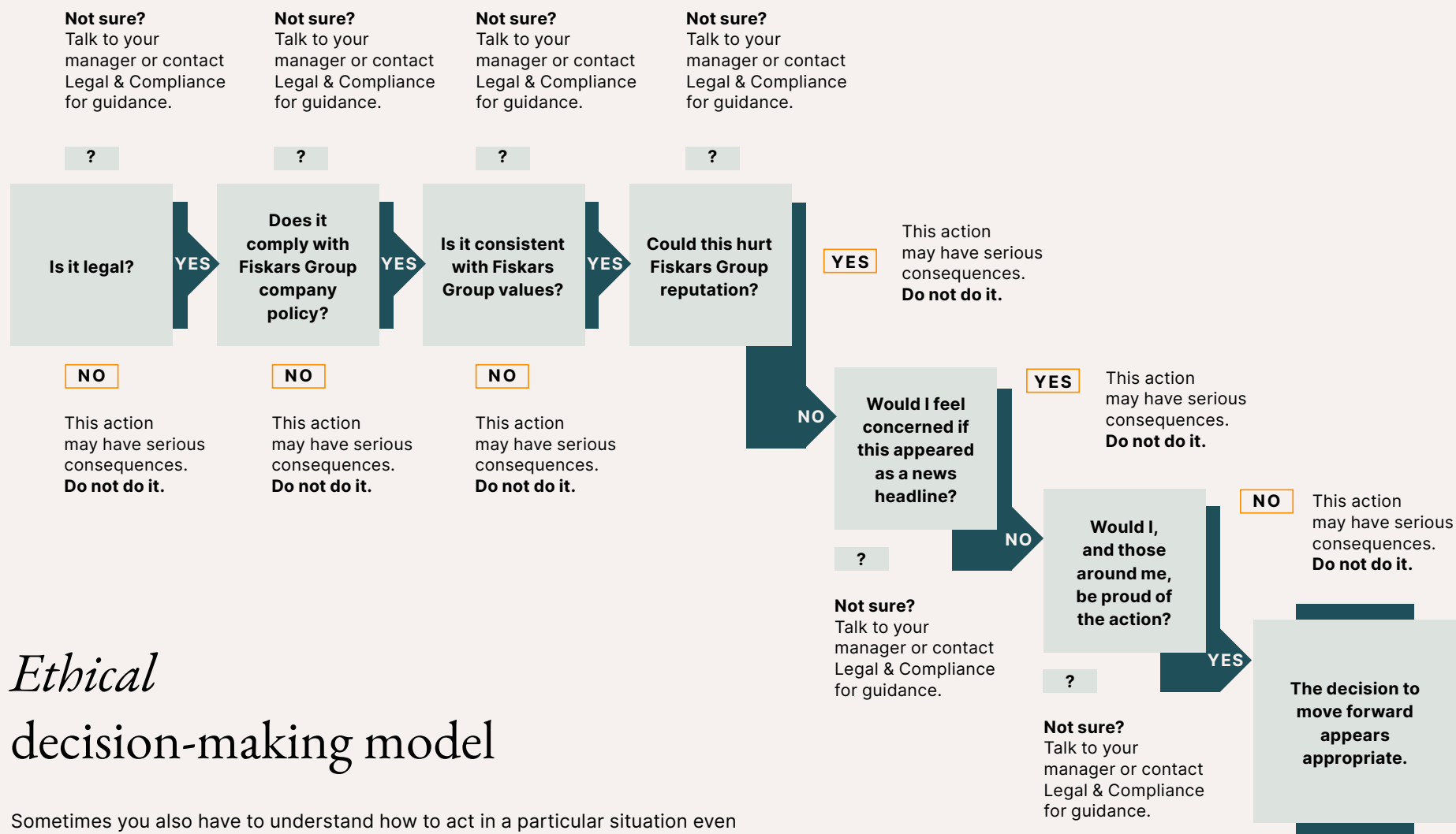


There will be no negative consequences at work for any persons reporting suspected violations. Fiskars Group prohibits retaliation in any form against anyone who reports violations or suspected violations of the Code of Conduct, our policies, or applicable law, or who assists in the investigation of a reported violation.



HOW SHOULD MANAGERS HANDLE CONCERNS?

It is expected that our leaders act according to our values in all situations. If someone comes to you with a concern or question, you have a responsibility to listen and act. Handling concerns appropriately is critical to preserving trust. Respond respectfully and take every concern seriously. If unsure how to act, you may seek further advice from HR or Legal and Compliance.



Ethical decision-making model

Sometimes you also have to understand how to act in a particular situation even when there are no instructions available. In those cases, as you are deciding what action to take, answer the questions in the Fiskars Group Ethical Decision Making Model to help you determine the most appropriate way to proceed.



Our *ethical principles*

Compliance with laws and regulations

Fiskars Group is committed to full compliance with all applicable laws and regulations of relevant countries. All our business is conducted according to the law and with integrity. All Fiskars Group People must be aware of and conduct their activities in accordance with this Code of Conduct and all supporting Fiskars Group policies, even when the Code requires a higher standard of behavior than is required by national laws and local regulations.

The Code and Fiskars Group Policies cannot cover every situation, particularly as laws differ between countries. If a specific situation is not expressly covered, the spirit of the Code and our Policies must be upheld by exercising common sense and good judgment – always in compliance with applicable laws.



We all must have sufficient knowledge of laws and regulations as well as our internal policies. Depending on your role, you must know the laws and regulations that relate to your work. There is no excuse for ignoring the law.

Respecting human rights

At Fiskars Group we respect and actively promote human rights and believe that it enables us to grow our business responsibly and sustainably. All Fiskars Group People, suppliers and partners have a role to play in defending human rights throughout our entire value chain. This includes promoting safety, health, and wellbeing, championing diversity, inclusion, and equal opportunities, working against harassment and discrimination, and fighting corruption and bribery.

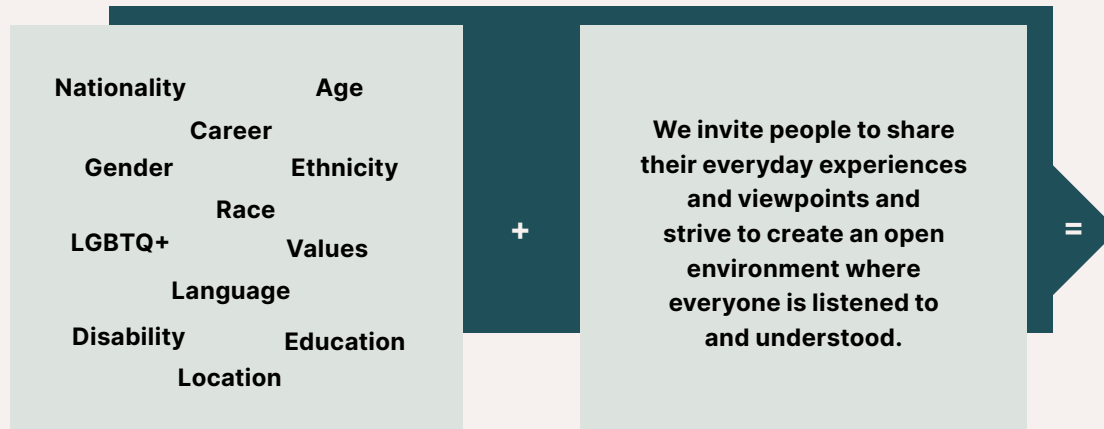
We are committed to adhering to the International Bill of Human Rights, UN Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Compact principles.



Good design
is thoughtful



DIVERSITY AND INCLUSION AT FISKARS GROUP



Inspired to be
extraordinary,
together

DIVERSITY AND INCLUSION

At Fiskars Group, we want everyone to feel and be inspired to be extraordinary, together. We invite people to bring their everyday experiences and viewpoints into the conversation, and strive to create an open environment where everyone is listened to and understood. Together, we celebrate diversity in all its forms and embrace all the dimensions that make us unique. By exploring, learning, and creating together, we can make daily life better for each other and the world around us.

Fiskars Group is committed to equal opportunity in all employment practices, policies and rules as well as treating all employees fairly and impartially based on competence, experience and performance, without regard to race, ethnicity, age, disability, gender, or sexual orientation and/or any other characteristics.



HEALTH AND SAFETY

Fiskars Group is committed to ensuring high standards of Health and Safety management throughout its operations worldwide. We actively promote a culture of safety and zero harm by encouraging Fiskars Group People to be proactive and to take their responsibility to prevent work-related incidents seriously. Safety at work is everyone's responsibility and we all have duty to inform management about any safety issues. No compromises in workplace safety are permitted and it is everyone's duty to act if any safety issues are identified.



**See a health and safety issue?
Report it to Safety lncy.io!**

**All Fiskars Group People have
access to the reporting system.**

**Reporting observations, near
misses, and accidents helps us to
improve and remain safe at work.**

LABOUR RIGHTS

Fundamental labor rights must be respected, including freedom of association and collective bargaining. We are committed to the elimination of all forms of forced or compulsory labor, child labor, and of discrimination in respect of employment and occupation. This reflects our support for the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Fiskars Group complies with all relevant labor laws and regulations. We do not allow working conditions or treatment that contravene basic human rights. We have zero-tolerance for child labor, and we safeguard vulnerable workers from abuse or exploitation, regardless of their employment contract or immigration status.



RESPONSIBLE CAREER PRACTICES

We create transparency and equal opportunities for our employees for all open jobs by posting them on our internal career site for a minimum of one week internally. All internal candidates are interviewed based on their skills and experience.

We follow country-specific legal requirements and practices regarding the management of career endings. In situations that have a significant impact on individuals and local communities, we take steps to provide additional support.

ZERO TOLERANCE TOWARDS HARASSMENT AND BULLYING

We are committed to ensuring a work environment free of physical, psychological, and verbal harassment or other abusive conduct. We do not tolerate discrimination on any basis. We have zero-tolerance for harassment and bullying.

Respect for people and protection of human rights is paramount. Fair treatment is not just a matter for managers and leaders. All Fiskars Group People shall treat each other and our stakeholders with respect, and there is no room for degrading behavior.

Good design is
honest and inspiring

MY CONTRIBUTION:

I accept human rights as a fundamental guideline, and I promise to be vigilant against human rights violations happening around me.

REPORTING

If you hear or see anything that can be considered harassment or bullying, or any other violation of human rights, it's your duty to act, always and without delay. Threats, intimidation, and violence in the workplace is not tolerated. Please see section "Speak Up!" in this Code of Conduct for reporting mechanisms.



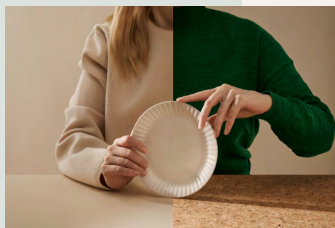


Sustainability commitments

Fiskars Group Sustainability commitments guide our work towards our 2030 ambition and help us make decisions in our daily lives.

AGAINST THROWAWAY CULTURE

We fight throwaway culture by developing circular solutions to extend the joy they provide and to minimize the strain on the planet.



FOR A CARBON- NEUTRAL FUTURE

We take climate action by reducing our impact in line with a 1.5°C future. We are transforming to a carbon-neutral business.



FOR INCREASED JOY

We create a positive impact on the quality of life for people and communities.



Respecting the environment

Our sustainability ambition requires input from all of us, and we must consider sustainability in everything we do. We constantly challenge ourselves and actively explore new materials, business models, and ways of working. Make sure you know our current sustainability targets and what impact these targets have on your work.

In the future, we want to be a carbon-neutral business. We joined the UN Business Ambition for 1.5°C initiative, and we have set science-based targets that have been approved by the Science Based Targets initiative.

We work towards being a carbon neutral business by, for example, improving our efficiency, investing in renewable energy sources, and mitigating emissions from our value chain with our partners and suppliers.

Our target is to not send any waste to landfill. This includes all our operations from manufacturing to our retail stores, offices, and distribution centers. For example, we investigate opportunities to utilize recycled materials, improve our materials, and develop recycling processes. By 2030 we aim to use only fully circular and sustainable materials in our operations, products, and packaging and ensure that all waste is recycled correctly, reused, or recovered.

- **Save water and electricity, recycle and reuse. Remember that the small things that we do each day significantly impact us and our future.**
- **Make wise choices: choose renewable, recycled, or recyclable materials whenever possible.**
- **Be innovative and share your thoughts. If you have ideas on improving our work, share them with your team and management.**
- **Set an example and inspire people to join us on our mission for the lasting well-being of people and the planet.**
- **Make sure you know our current sustainability commitments and targets.**



Community engagement

Fiskars Group is committed to ensuring that all community engagement activities are implemented with high ethical standards and that they positively impact our business and our partners' cause.

Fiskars Group is part of the communities where we operate in, and we want to make a positive impact so that these communities can thrive economically, socially, and environmentally. We support this by actively contributing to these communities' positive development and minimizing any negative impacts our operations may have on them.

While striving to strengthen mutual understanding and building local relationships and respecting local communities' cultures, customs and values, Fiskars Group and all Fiskars Group People shall always first and foremost live by our values and our Code of Conduct.



AIMS

With our community engagement initiatives, we aim to:

- **Support our efforts in achieving our sustainability ambition and commitments**
- **Engage with our local communities so that we can have a positive impact on societal and/or environmental issues in local communities**
- **Minimize any potential negative impacts to local communities**
- **Help our employees be more engaged with the company and their work**
- **Build our reputation as a responsible and sustainable company**
- **Embrace the global team – working as one team to make a more significant impact**

RESTRICTIONS

Fiskars Group will not support or conduct any initiatives related to:

- **Individuals (scholarships, stipends, research), excluding trainee programs and internships**
- **Activities or events having a significant negative environmental impact**
- **Any political organizations and campaigns, or other political activities**
- **Activities, events, or organizations believed to be discriminatory or unethical**
- **Religious groups for religious purposes**



Clear and precise communication with external stakeholders

All Fiskars Group's external communications and disclosure shall follow the principle of disclosing relevant and accurate information in a timely manner and non-selectively to all participants on the market. Any information shared must be correct, consistent, reliable, and timely, and it must not be misleading.

Fiskars Group communicates material issues, both positive and negative equally and simultaneously to all stakeholders. We aim to give a fair and correct view of the Company's operations and business, strategy, investments, and financial status to support a fair valuation of the Company's shares.

All Fiskars Group's marketing communications must be legal, decent, honest, and truthful and shall not include misleading facts or statements. It must be prepared with a due sense of social, environmental, and professional responsibility.

Fair dealing

Fiskars Group always competes by fair and ethical business practices. This means that unfair dealing practices such as manipulation, concealment, abuse of privileged information, misrepresentation of material facts and other unfair advantages should not be used.

Free and open competition

Free and open competition is the basis of competition laws globally. Even if the competition laws are not uniform in all countries, certain common basic principles regulate relationships with business partners and competitors. Fiskars Group embraces free and open competition and prohibitions of collusive and unfair business behavior.



Fiskars Group customers range from individual consumers at our stores and online, wholesale accounts, major hospitality and institutional customers, distributors, and licensees. We aim to create long-term customer relationships and, therefore, we need to exercise fairness in all relationships with our customers. There is no room for unfair quick wins. We want to exceed our customers' expectations. By doing this, we can become a preferred partner for our customers.

Fiskars Group is committed to ensuring that every customer can expect the highest quality of customer care and are treated in a courteous and friendly manner.



Anti-bribery and anti-corruption

Corruption is the abuse of entrusted power for private gain, and it undermines the rule of law and trust in businesses and its leaders. Corruption disrupts competitive markets, misallocates resources, and can lead to violations of human rights. Fiskars Group as a company and Fiskars Group's Peoples as individuals representing the Company shall take responsibility to prevent corruption in all its forms, including acts of bribery, facilitation payments and inappropriate gifts, hospitality and favors.

Bribery involves the giving or receiving of money or anything else of value as an inducement or reward for an improper act. An act will be improper if it involves someone performing, or failing to perform, a function illegally, unethically, in bad faith, not impartially, or in breach of a position of trust.

Bribery can take place where the offer or payment is made indirectly through a third party, such as an agent. Bribes can take many different forms, such as cash payments, gifts, hospitality e.g. (meals, hotel stays or tickets or invitations to sporting and cultural events), other promotional expenses (e.g. travel and accommodation expenses), political contributions or charitable donations.

Do not receive money or anything else of value where you know or suspect that it is offered or provided either with the intention of inducing any person to provide any improper commercial or other advantage.



Any action which can be perceived as corruption is often judged to be corruption. It is your responsibility as an employee to avoid any situation which can be seen as such. Corruption causes business decisions based on dishonest and unfair criteria. As a company, we always promote open and fair competition.

You must not, whether directly or indirectly, or through a third party:

Provide money or anything else of value to any person with the intention of obtaining, retaining, or rewarding any improper commercial or other advantage.





Conflict of interest

Fiskars Group will not tolerate any situation where personal activities and interests of Fiskars Group's People conflict or appear to conflict with the best interests of Fiskars Group. This includes situations where an employee's judgment is likely or appears to be influenced by the possibility of personal financial or any other gain. The same applies where an external engagement negatively impacts the individual's ability to fulfill his or her duties to Fiskars Group.



DO NOT:

- **Compete with Fiskars Group in any form.**
- **Resell products you have acquired using Fiskars Group employee benefits (however, if you have an old, used Fiskars Group product that you do not need anymore, you can of course sell it)**
- **Allow your personal, financial, or political activities to influence or be perceived to influence the way you do your work at Fiskars Group.**
- **Conduct personal business deals with your friends or family on behalf of Fiskars Group.**

Export controls

Fiskars Group complies with any applicable export controls and regulations, which restrict trade or export activities with certain countries, entities, or individuals. These controls have the aim and purpose of pressuring the targets from violating international law or human rights. The controls are also targeted to prevent the proliferation of weapons of mass destruction and/or limit flows of weapons or goods that could be used for military purposes.



Maintaining competitive advantage

Intangible assets

Intellectual property rights (“IPR”) are the most important assets of Fiskars Group. Fiskars Group's core identity is based on our unique brands, product design, functionality, and technical advantage of the products. To ensure that the investment into these results of intellectual effort does not benefit competition, and to ensure the best possible return on that investment, the ownership of the IP assets must be secured by utilizing suitable forms of IPR.

The right to prohibit others from utilizing and exploiting Fiskars Group's intangible assets protected by IPRs is the main reason why trademarks, designs, patents, and utility models are registered and why Fiskars' rights are monitored. Fiskars Group has different types of monitoring services in use to become aware of infringements. Fiskars Group People also have a very important role in monitoring Fiskars Group's rights and observing activities of the competitors and other operators. In addition, Fiskars Group's customers and partners should bring infringements to Fiskars Group's attention.



IPR = Intellectual Property Rights consist of trademarks, designs, patents, utility models, domain names, copyrights, and trade secrets.

IPRs are exclusive rights.

With IP rights, we protect our products against copying and ensure that our products maintain their appeal.

Securing IPR protection in a timely and professional manner is essential – if we fail to do so, we may not be able to prevent others from benefiting from our brands, designs, and innovations.

Fiskars Group People have the responsibility to safeguard Fiskars Group's confidential or business-critical information as any unauthorized use may seriously harm Fiskars Group's business.

Fiskars Group respects the trade secrets and intellectual property that suppliers, customers, or other partners have entrusted to Fiskars Group for business purposes. It is the responsibility of Fiskars Group's People to protect and maintain the confidentiality of such information.



Good design
is *innovative*



Tangible assets

Fiskars Group is committed to managing and safeguarding its assets no matter where they are located, stored, used, or shown. By protecting our assets, we protect our competitive advantage in the marketplace. However, we also have a responsibility to extend the same degree of care towards assets entrusted to us by our business partners and other stakeholders.

All Fiskars Group's People must protect company assets against cyber-related attacks, theft, loss, waste, abuse, destruction, damage, unauthorized use, removal, or similar risks. Company assets and resources may only be used to conduct company business. Fiskars Group's People must not use company assets for anything other than legitimate business or other authorized purpose.



OUR ASSETS INCLUDE:

- **Physical assets, such as machinery, office furniture, equipment, tools, and supplies.**
- **Technology assets, such as computer hardware, software, and information systems.**
- **Financial assets, such as cash, securities, and credit cards.**
- **Our Company's name, its brand, our product brands, and our customer relationships.**
- **Information assets such as data and analytics, business secrets, and personal data.**
- **Intellectual property such as inventions, patents, copyrights, and trademarks.**



Data protection and information security

The purpose of data protection and information security is to protect our customers, employees, suppliers, and other stakeholders, their personal data, and other confidential information.

At Fiskars Group, information security and protecting data is everyone's business. Information shall be processed and protected appropriately and in compliance with the applicable legislation. To ensure protection of our data, you must follow our data protection and privacy policies, which among other things require that the collection, access, processing, use and sharing of data, including personal data or personally identifiable information (PII) be only for legitimate, authorized purposes. If sharing our personal data to third parties, there must be an appropriate contract in place that addresses use and protection of personal data.

Employees are required to ensure the appropriate and secure use of the equipment and software in their possession to prevent personal data and other confidential information from being compromised.



Laws and regulations regarding data protection may vary from country to country. Seek guidance and ask more: privacy@fiskars.com

MY COMMITMENT

To protect our data and technology and ensure that information is kept safe from theft, loss, misuse or disclosure. I will take accountability for the information and technology I handle.





We employ approximately 7,000 people in 30 countries, and our products are available in more than 100 countries. Our shares are listed on the Nasdaq Helsinki (FSKRS).

Please visit us at www.fiskarsgroup.com for more information and follow us on Twitter [@fiskarsgroup](https://twitter.com/fiskarsgroup).

CONTACTS

For additional information and advice, please get in touch with your manager, HR, or Legal and Compliance at compliance@fiskars.com.

Fiskars Group

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RELATED FISKARS GROUP POLICIES

- Anti-corruption and Anti-bribery Policy
- Antitrust Policy
- Code of Conduct Violation Response Policy
- Community Engagement Policy
- Communication Policy
- Contract Management Policy
- Credit Policy
- Crisis Communication Policy
- Data Protection Policy
- Disclosure Policy
- Employment Policy
- Environmental Policy
- Export Control Policy
- Group Expenditure Authorization Policy
- Health and Safety Policy
- Insider Policy
- Marketing Policy
- Quality Policy
- Recall Policy
- Record Retention Policy
- Recruitment and resourcing Policy
- Risk Management Policy
- Sourcing and Purchasing Policy
- Supplier Code of Conduct
- Tax Policy
- Travel Policy
- Treasury Policy



Good design sparks
enjoyable moments
to remember