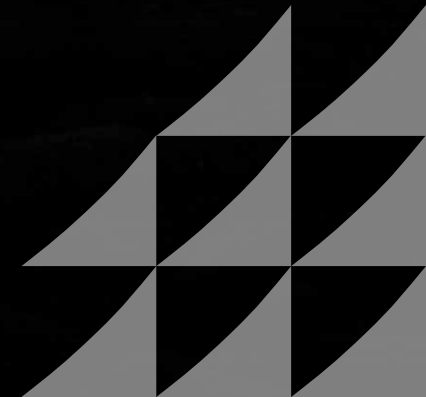


A forerunner in responsibility

# METSÄHALLITUS CODE OF CONDUCT



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1.

# GREETINGS FROM THE DIRECTOR GENERAL

Corporate responsibility is part of our management practices and daily work. An ethical and responsible approach is an integral part of our values and activities.

This Code of Conduct provides the basis for responsibility management in Metsähallitus and is part of the process of ensuring compliance with all relevant requirements.

This document sets out the key principles of responsibility and ethical conduct, which apply to all Metsähallitus employees, regardless of their position or tasks.

We all in Metsähallitus are strongly committed to observing this Code of Conduct. By making the right decisions and choices, we want to contribute to a more responsible and equal society. We also encourage our stakeholders to observe and respect these principles.

**Pentti Hyttinen**  
Director General



## OUR VALUES

This Code of Conduct is founded on the values of Metsähallitus:

### Care

We do everything we can to promote the responsible use and management of natural resources as well as biodiversity and cultural heritage. Customers, partners and colleagues are important to us.

### Importance

We do important work for the good of Finland as a whole, Finnish society and nature. This is a force that helps bring together many different hopes and goals, even those conflicting with one another.

### Effectiveness

Our work produces results. These results offer both tangible and intangible benefits, which are achieved in state-owned land and water areas in a sustainable manner and passed on from generation to generation.



### METSÄHALLITUS EMPLOYEE

In this Code of Conduct, 'Metsähallitus employee' means all employees, public officials, and trainees working in the Metsähallitus Group, and other persons in a service relationship with the Metsähallitus Group, the employees of Metsähallitus subsidiaries and the board members and managing directors of Metsähallitus and its subsidiaries.

## WE ACT IN ACCORDANCE WITH THE LAW AND THE COMMITMENTS THAT WE HAVE MADE

▶ Metsähallitus is a state-owned enterprise and the provisions governing our activities are laid down in the Act on Metsähallitus. Compliance with the law and regulations is the basis for all Metsähallitus activities and it provides the minimum level for what we do. In addition to applicable laws and regulations, Metsähallitus also complies with the principles of good governance and generally accepted business principles.

▶ We are committed to the Sustainable Development Goals of the United Nations (2030 Agenda).

▶ We adhere to the Universal Declaration of Human Rights and observe the UN Guiding Principles on Business and Human Rights.

▶ Compliance with the law and our commitments means that every Metsähallitus employee must ensure that they act in accordance with the law and our commitments. We also expect this of our partners.



### THIS IS HOW I ACT

I assess my actions by the following questions:

- Is my action in accordance with the law?
- Is my action correct and fair?
- Is my action in accordance with the objectives and values of Metsähallitus?
- Is my action in accordance with the principles of good governance of Metsähallitus and its partners?
- Is my action in accordance with the action expected by our stakeholders of their partners?
- Is my action also acceptable in the eyes of the public?

If I cannot answer 'yes' to each of these questions, I will consult my supervisors or Legal Affairs.

## WE PROTECT THE ENVIRONMENT AND USE IT IN A SUSTAINABLE MANNER

▶ Management of environmental matters is part of our daily work. We act systematically to protect the environment and to ensure sustainable use of natural resources in accordance with the principle of continuous improvement. Every Metsähallitus employee must take environmental matters into account in their daily work and act in a responsible manner to protect our common environment.

▶ We safeguard the biodiversity of state-owned land and water areas, maintain the vitality of game and fish stocks, and ensure the preservation of the cultural heritage by acting in a climate-wise manner and by anticipating environmental impacts. We develop our activities from the perspective of climate change mitigation and adaptation.

▶ We work to prevent and minimise the negative environmental impacts of our activities by using eco-efficient methods, by identifying environmental risks and by regularly monitor-

ing and assessing the environmental impacts of our activities. We also take into account environmental factors and potential risks in our agreements.

▶ We enhance regional vitality and wellbeing by reconciling the extensive use of natural resources with their protection in accordance with our objectives. We create prerequisites for a sustainable growth in nature and wildlife tourism, while at the same time ensuring that the protection objectives for the areas are achieved. We safeguard the sustainable use of water areas.

▶ We are committed to the Sustainable Development Goals of the United Nations (2030 Agenda). The use of multiple-use forests is guided by the statutory social obligations set for Metsähallitus and the PEFC forest certification. The management of environmental matters is in accordance with a certified ISO14001 environmental management system.

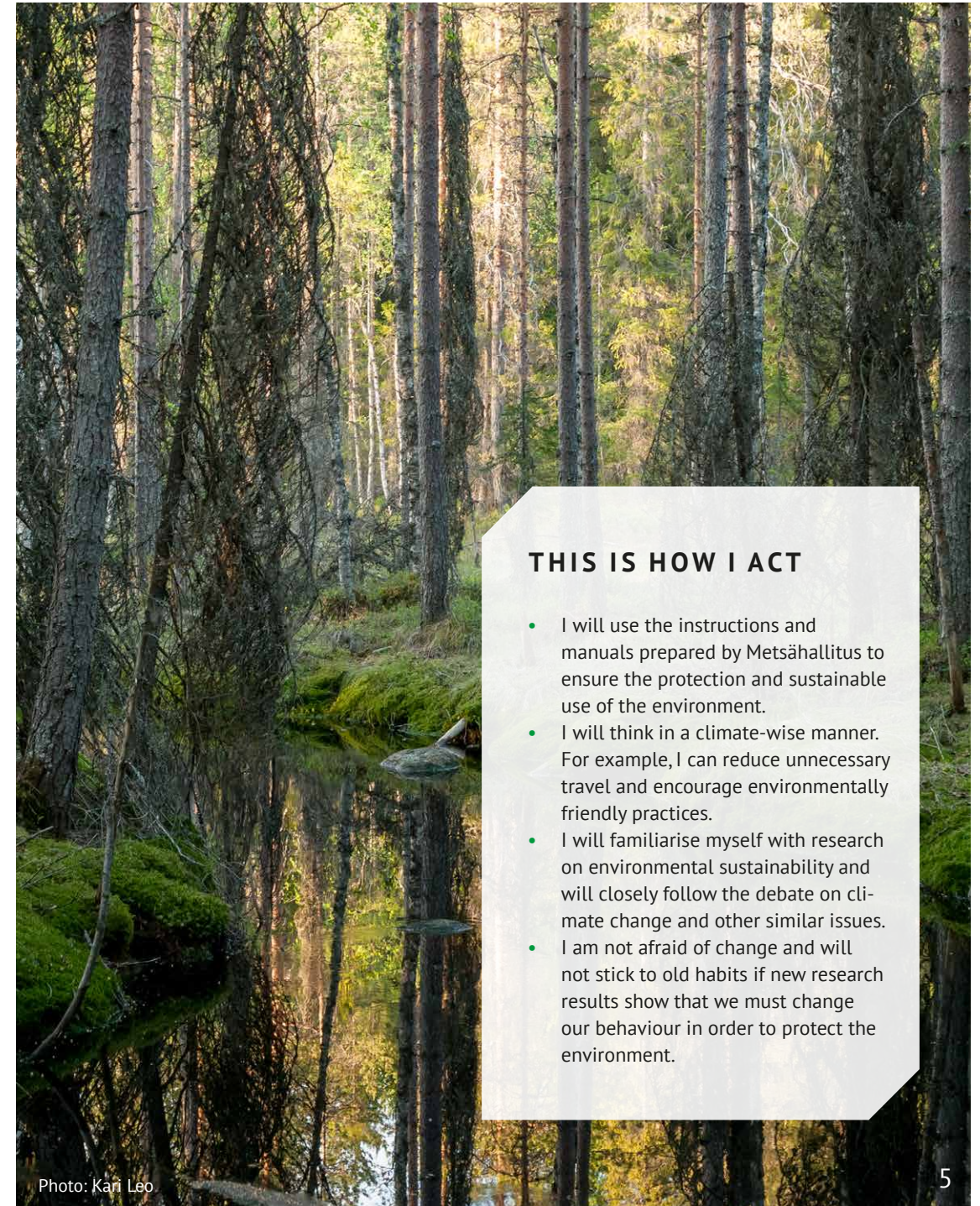


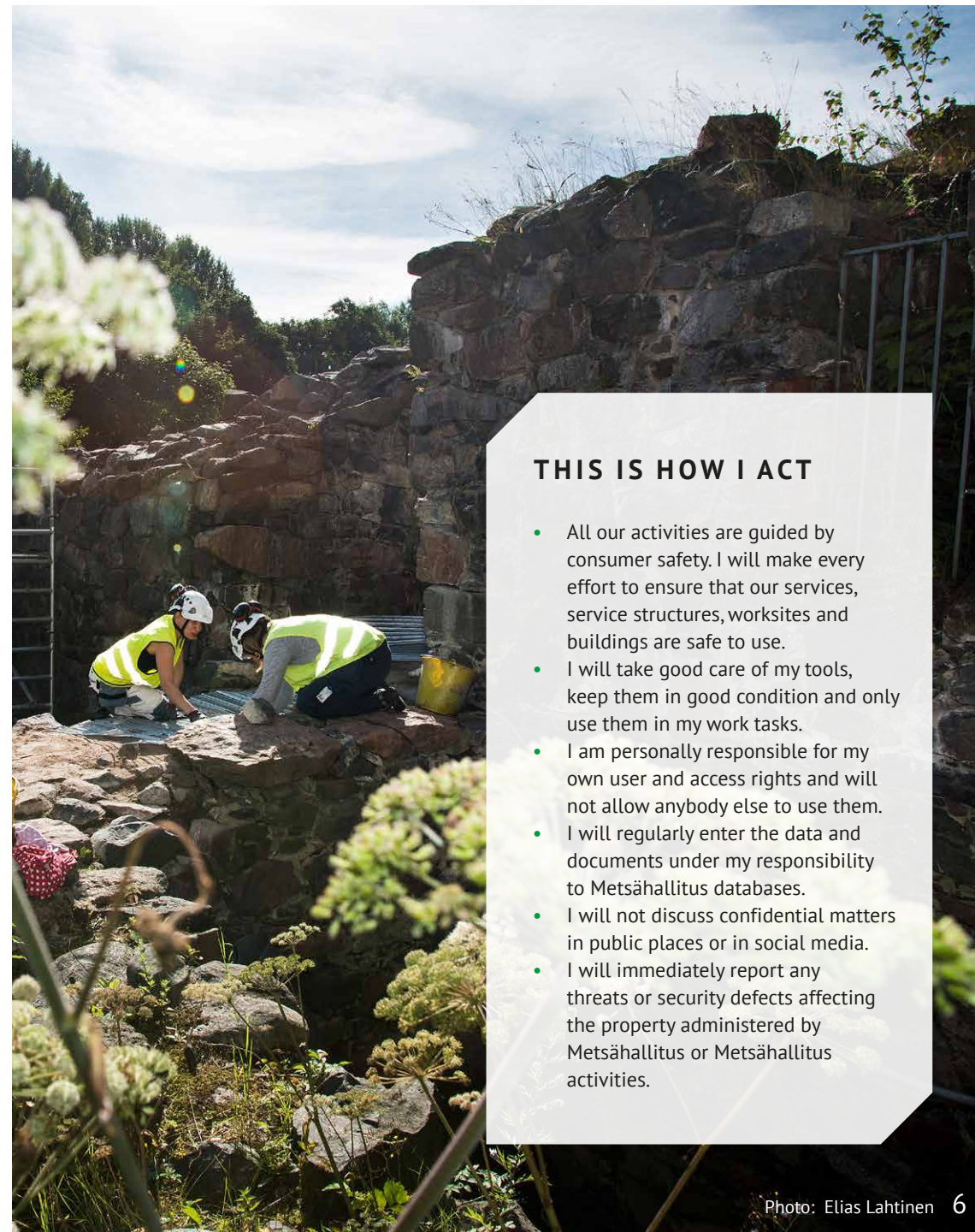
Photo: Kari Leo

### THIS IS HOW I ACT

- I will use the instructions and manuals prepared by Metsähallitus to ensure the protection and sustainable use of the environment.
- I will think in a climate-wise manner. For example, I can reduce unnecessary travel and encourage environmentally friendly practices.
- I will familiarise myself with research on environmental sustainability and will closely follow the debate on climate change and other similar issues.
- I am not afraid of change and will not stick to old habits if new research results show that we must change our behaviour in order to protect the environment.

## WE TAKE CARE OF THE ASSETS, PROPERTY AND INFORMATION ENTRUSTED TO US

- ▶ We manage, use and protect state-owned land and water areas administered by Metsähallitus in a sustainable manner. We reconcile the needs of entrepreneurs operating in state-owned land with the recreational use of the areas. We generate economic and social value for the State of Finland.
- ▶ We manage and protect Finland's natural and cultural heritage in a responsible manner. We create opportunities for local industries and generate benefits for society at large.
- ▶ We keep the property under our management in good condition and ensure that all consumer safety requirements are met. We protect our assets, property, information and premises and the environment against accidents, damage and criminal activities.
- ▶ We take good care of the property and assets under our responsibility and only use it for the purposes intended by Metsähallitus.
- ▶ We administer a substantial amount of geographic information on state-owned land and water areas. We ensure its comprehensiveness, extent and integrity throughout its lifecycle. We promote the availability and use of open data.
- ▶ We recognise the importance of information and intellectual property rights and the need to protect them. We protect all confidential information, prevent the unlawful change of information and ensure the availability of information. We make every effort to ensure undisturbed functioning of information systems at a specified service level. We pay particular attention to information security and data protection.



### THIS IS HOW I ACT

- All our activities are guided by consumer safety. I will make every effort to ensure that our services, service structures, worksites and buildings are safe to use.
- I will take good care of my tools, keep them in good condition and only use them in my work tasks.
- I am personally responsible for my own user and access rights and will not allow anybody else to use them.
- I will regularly enter the data and documents under my responsibility to Metsähallitus databases.
- I will not discuss confidential matters in public places or in social media.
- I will immediately report any threats or security defects affecting the property administered by Metsähallitus or Metsähallitus activities.

## WE RESPECT HUMAN RIGHTS

- ▶ We recognise the stakeholder groups relevant to our activities, listen to them and engage in close cooperation with them. We recognise the aims and needs of local residents, our stakeholders and our interest groups concerning the use of state-owned land and water areas.
- ▶ We do not tolerate any discrimination on the grounds of age, gender, origin, language, belief, religion, opinion, disability, health, sexual orientation or other person-related reasons in our activities, services, work community or supply chain.
- ▶ We safeguard the prerequisites of the Sami culture in the Sami Homeland by negotiating on important issues with the Sami Parliament so that agreement can be reached before any decisions are made. In important plans concerning land use and the use of natural resources, we take into account the needs of Sami culture, based on local Sami traditions. We conduct negotiations with the Sami users of the areas, designated by the Sami Parliament, throughout the planning process and give reasons for our decisions.
- ▶ We develop joint planning methods to reconcile the needs of entrepreneurs operating in state-owned land areas with their recreational use from the perspective of overall benefits and vitality of the regions.
- ▶ We respect all human and fundamental rights, including linguistic rights. We also expect all our contractual partners to respect human rights.

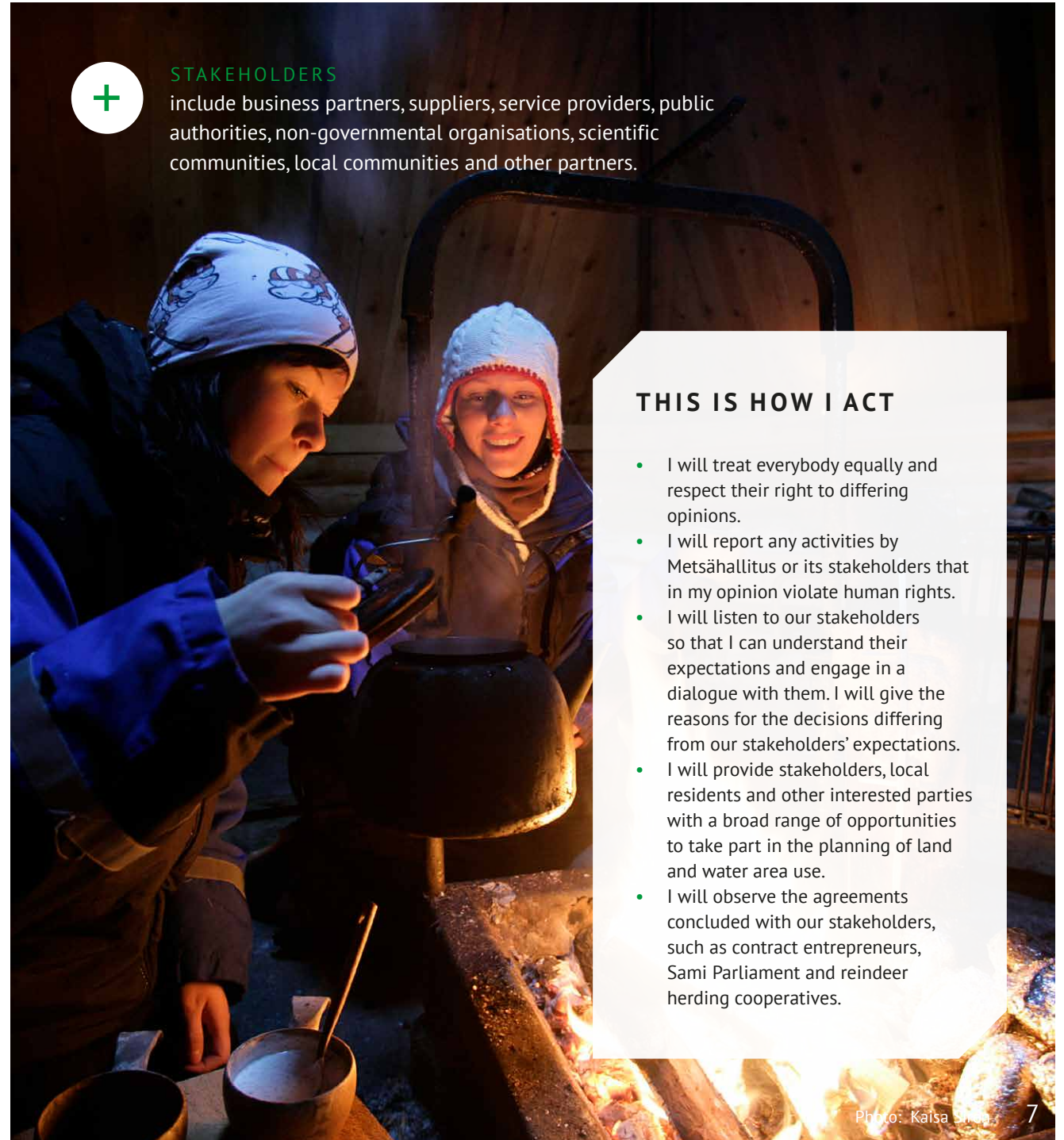


### STAKEHOLDERS

include business partners, suppliers, service providers, public authorities, non-governmental organisations, scientific communities, local communities and other partners.

### THIS IS HOW I ACT

- I will treat everybody equally and respect their right to differing opinions.
- I will report any activities by Metsähallitus or its stakeholders that in my opinion violate human rights.
- I will listen to our stakeholders so that I can understand their expectations and engage in a dialogue with them. I will give the reasons for the decisions differing from our stakeholders' expectations.
- I will provide stakeholders, local residents and other interested parties with a broad range of opportunities to take part in the planning of land and water area use.
- I will observe the agreements concluded with our stakeholders, such as contract entrepreneurs, Sami Parliament and reindeer herding cooperatives.



## WE CREATE AND MAINTAIN A GOOD WORKING ATMOSPHERE

- ▶ We value cooperation skills, responsible performance and innovation. We treat everybody fairly and equally.
- ▶ We actively promote a management culture that is in accordance with Metsähallitus values. We support an open organisational culture and encourage active exchange of views.
- ▶ We systematically promote equality and non-discrimination among our personnel. We do not tolerate any exploitation, harassment or bullying in our work community. We do not discriminate against anybody on the grounds of age, opinion, religion, gender, sexual orientation, health or other person-related reasons in recruiting or during employment relationships.
- ▶ Our aim is to have zero occupational accidents. We are actively working to reduce absences caused by sickness and to keep the motivation of our employees at high level. Ensuring the working capacity of our personnel and the functioning of the work community is a high priority.
- ▶ We observe all applicable instructions and work to ensure a high level of occupational safety.
- ▶ We support the objectives of continuous learning through on-the-job learning and self-directed learning.
- ▶ We encourage all Metsähallitus employees to take more responsibility for self-development and for developing their own work.



### THIS IS HOW I ACT

- I will promote an open and trust-based discussion culture and working atmosphere.
- I will observe all work and operating instructions.
- I will report all occupational safety deficiencies so that the problems can be corrected without delay and nobody's work is affected.
- If I notice harassment, I will report the incident so that the situation can be appropriately and confidentially dealt with and corrected.
- I respect other people's opinions even if they differed from my own. I support my colleagues.
- A supervisor's duty is to set goals and help employees to achieve them and deal with deficiencies without delay.
- I will use online training opportunities provided by Metsähallitus and also take active part in the other training courses offered to the employees.

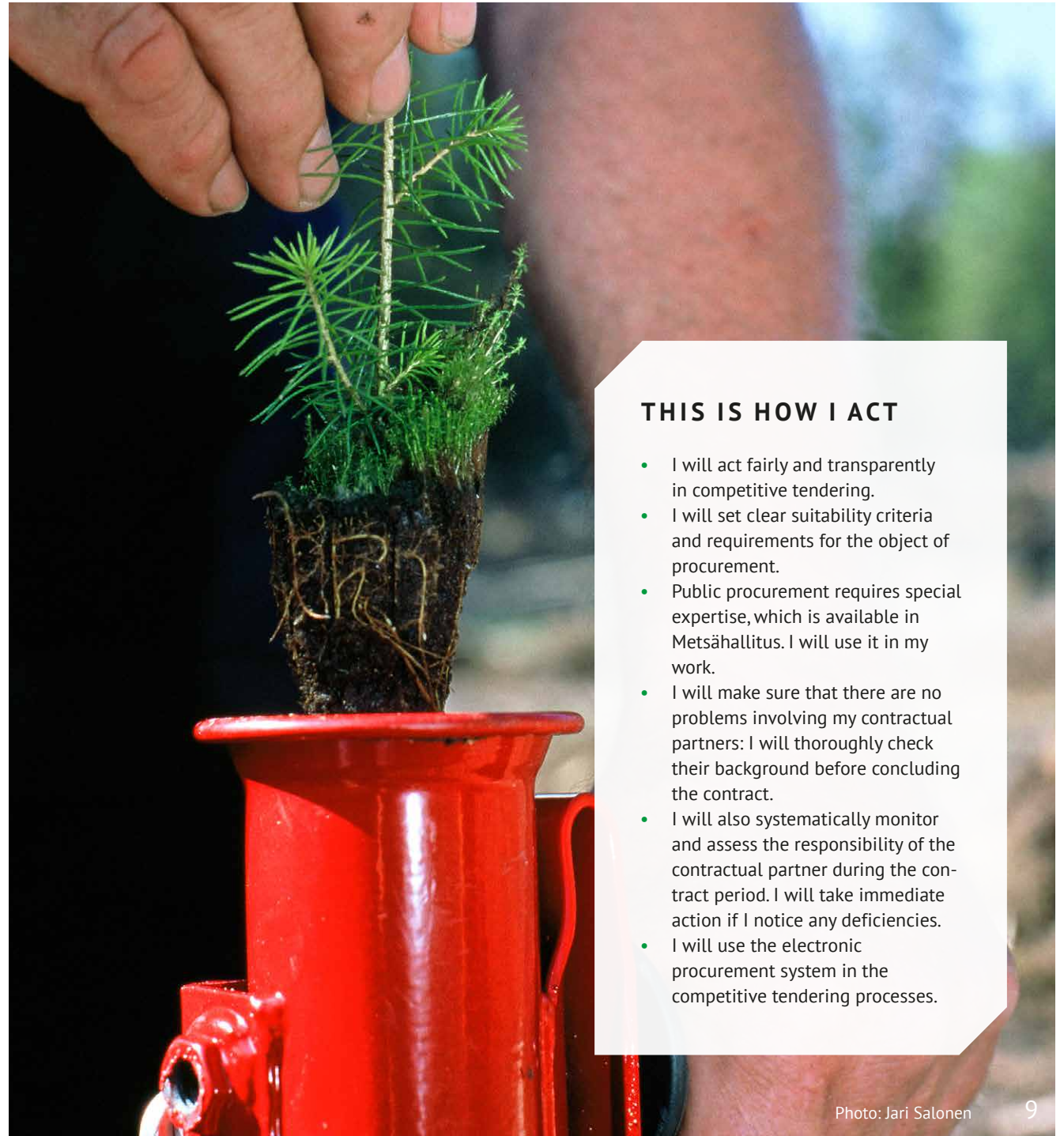


## WE MAKE RESPONSIBLE PROCUREMENTS

- ▶ We are committed to responsible procurement. We comply with the Act on Public Procurement and Concession Contracts and the Act on the Contractor's Obligations and Liability.
- ▶ Reliable contractual partners are important to our operations. Therefore, it is also essential that our partners act in a responsible manner.
- ▶ We select our contractual partners through competitive tendering using fair and transparent criteria.
- ▶ We take into account economic, social and environmental aspects of responsibility when selecting our contractual partners and monitor them regularly and systematically throughout the contract period.
- ▶ We expect that all contractual partners of Metsähallitus act in accordance with the law and support free competition, responsible procurement and the principles laid out in this Code of Conduct.
- ▶ We also expect that the contractual partners require compliance with responsibility principles in their own supply chains.

### THIS IS HOW I ACT

- I will act fairly and transparently in competitive tendering.
- I will set clear suitability criteria and requirements for the object of procurement.
- Public procurement requires special expertise, which is available in Metsähallitus. I will use it in my work.
- I will make sure that there are no problems involving my contractual partners: I will thoroughly check their background before concluding the contract.
- I will also systematically monitor and assess the responsibility of the contractual partner during the contract period. I will take immediate action if I notice any deficiencies.
- I will use the electronic procurement system in the competitive tendering processes.



## WE AVOID CONFLICTS OF INTEREST

- ▶ Every Metsähallitus employee must act in accordance with the obligations and interests of Metsähallitus when matters are considered and decisions made.
- ▶ A Metsähallitus employee is disqualified from involvement in a matter when their relationship with the matter or with the parties involved may endanger the employee's impartiality.
- ▶ Metsähallitus makes every effort to avoid situations that may also endanger its reliability and credibility when assessed by outsiders.
- ▶ In their work, Metsähallitus employees may not take part in the consideration of matters from which they, parties close to them, or the

associations represented by the employees or parties close to them may receive economic or other benefits.

- ▶ In their secondary jobs or elected positions, Metsähallitus employees must avoid situations in which they have to take a stand or consider matters that concern the interests or obligations of Metsähallitus.
- ▶ We respect the freedom of speech, trade and association of Metsähallitus employees. However, in an employment or public service relationship, these freedoms are limited by the non-compete clause, loyalty obligation and confidentiality obligation.



### CONFLICT OF INTEREST

means a situation where a Metsähallitus employee is disqualified involving in a matter due to matters concerning the employee's

- personal interests
- the interests of a party close to the employee
- the interests of an association represented by the employee, which may be in conflict with the interests of Metsähallitus.



### THIS IS HOW I ACT

- I will always act in accordance with the interests of Metsähallitus and avoid situations leading to conflicts of interest and disqualifications.
- I will discuss the possible grounds for my disqualification as soon as I realise that such grounds may exist.
- If I realise that I am disqualified from taking part in decision-making, I will disqualify myself from the decision-making and ask a deputy to take my place.
- I will not accept any secondary jobs or elected positions that could seriously interfere with my tasks in Metsähallitus.
- I will not establish business relationships that are in clear conflict with the interests of Metsähallitus.
- I will keep in mind that when representing Metsähallitus, I represent the decisions reflecting the views of Metsähallitus.
- Also when in private capacity, I will act responsibly in all situations where I might be associated with Metsähallitus. I will observe the Metsähallitus guidelines on conflicts of interest and related parties in all my work.
- I will always consider how the matter would be viewed by outsiders or reported in the media.

## WE DO NOT TOLERATE BRIBERY OR CORRUPTION

- ▶ We have zero tolerance for all types of bribery and corruption. Corruption means all activities in which the aim is to improperly influence business operations or decision-making so that somebody receives unfair advantages.
- ▶ Metsähallitus or any person employed by it is not allowed to pay, offer, ask, demand or accept bribes or other unlawful benefits that may impact the objective and impartial execution of their tasks. Moreover, Metsähallitus employees are not allowed to urge, instruct or induce anybody to accept or give bribes directly or indirectly.
- ▶ One should always act with caution when offering or accepting hospitality or gifts. Only ordinary and modest hospitality and gifts are acceptable. Offering and accepting money and gift vouchers is prohibited in all situations. Moreover, hospitality and gifts should not be accepted repeatedly from the same party.



### THIS IS HOW I ACT

- Before giving or accepting gifts or hospitality, I will assess whether the situation involves something unusual or unacceptable. If I am not sure, I will ask for advice or say no.
- I will write down the names and job descriptions of the persons taking part in trips, representative events and other similar occasions, the dates of the events and the sums involved.
- I will keep in mind that acceptable (ordinary and modest) hospitality and gifts are given and accepted openly.
- The mere attempt to influence somebody in a wrong manner is bribery.
- If I experience bribery attempts or other unacceptable influencing, I will immediately notify my supervisor, Legal Affairs or Risk Management.

## EVERYBODY IN METSÄHALLITUS MUST OBSERVE THESE PRINCIPLES

- ▶ Every Metsähallitus employee, irrespective of their position or tasks must observe the principles set out in this Code of Conduct. We expect every Metsähallitus employee to study them and to observe them.
- ▶ Every Metsähallitus employee must adhere to the Code of Conduct and know how the principles set out in it impact the decisions that they make in their daily work. We also expect our partners to share these principles.
- ▶ Our aim is to make the Code of Conduct part of our daily work. We will provide our personnel with training in matters concerning the Code of Conduct and responsible and ethical approach. Every Metsähallitus employee is expected to take part in the training each year. We will also carry a yearly risk assessment to monitor the effectiveness of the Code of Conduct.
- ▶ If you are unsure how the Code of Conduct applies to specific situations, you should first turn to your supervisor or Legal Affairs.
- ▶ Staff members in managerial positions must provide information about the principles, guidance in matters concerning them and adherence to the principles in their own areas of responsibility.
- ▶ The Code of Conduct is a key part of ensuring compliance in Metsähallitus. Compliance consists of individual acts by individual Metsähallitus employees.



### THIS IS HOW I ACT

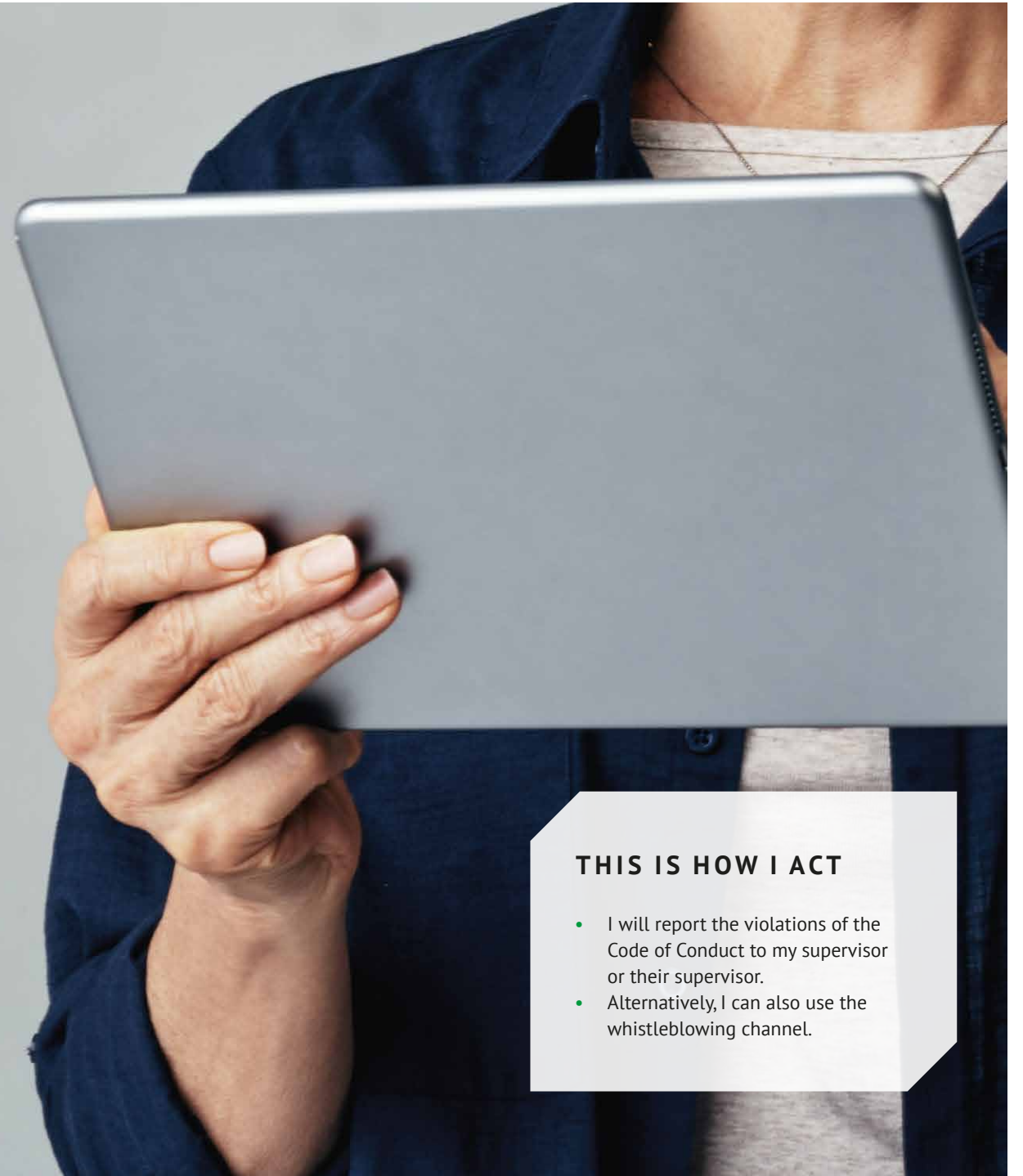
- The Code of Conduct contains the rules for responsible and ethical activities in Metsähallitus.
- I will familiarise myself with the Code of Conduct and observe it in all my work.
- I will take part in training events and keep my expertise up to date.

# REPORTING CONCERNS AND VIOLATIONS

- ▶ Violating the Code of Conduct weakens the reputation of Metsähallitus and the trust in our activities among our stakeholders, and it may also cause significant risks and damage to Metsähallitus.
- ▶ If you notice or suspect action that is in violation of the Code of Conduct, you should notify your supervisors immediately.
- ▶ We are committed to an organisational culture in which the employees can, without hesitation, tell about their concerns and suspected violations of the Code of Conduct. We will ensure that anyone who in good faith brings forth suspicions and takes part in the investigation of suspected violations will not suffer any negative consequences as a result.
- ▶ You should first report any violations of the Code of Conduct to your supervisors or their supervisors. You can also report your suspicions to our whistleblowing channel. Anonymous reports are also accepted.
- ▶ All reports are investigated confidentially, carefully and without delay. Any violations or suspected violations of the Code of Conduct are only made known to the parties that need to be involved in the investigation of the reports and in the implementation of the required measures.
- ▶ Information received through the reports will help Metsähallitus to develop its activities and tackle deficiencies.

## THIS IS HOW I ACT

- I will report the violations of the Code of Conduct to my supervisor or their supervisor.
- Alternatively, I can also use the whistleblowing channel.



# MEETING EXPECTATIONS



**METSÄHALLITUS**

[www.metsa.fi](http://www.metsa.fi) | Twitter ja Facebook: @Metsahallitus

Instagram: @metsahallitus\_forststyrelsen