>> Code of Conduct Terrafame Ltd

Scope

Our Code of Conduct defines Terrafame's general responsibilities and obligations, which are specified in the company's more detailed policies and guidelines. The Code of Conduct also forms the basis for the Supplier Code of Conduct, compliance with which is a prerequisite for cooperation with Terrafame. The Supplier Code of Conduct is available on the company's website.

Our Code of Conduct is binding to all Terrafame employees, management and the Board of Directors. Every Terrafame employee is personally responsible for implementing and promoting the Code of Conduct. We also adhere to the principles of this policy when working with suppliers, customers and other stakeholders.

We expect our collaboration partners and other business associates to commit to respecting corresponding principles in their own operations and supply chains. We also expect our customers to act responsibly and with respect for human rights.

We do not tolerate any breach or violation of the Code, and any infringements must be remedied promptly. Misconduct can result in disciplinary, legal or sanctions imposed by authorities on individuals or Terrafame as a company.

We are committed to communicating the Code of Conduct to our employees as well as to our collaboration partners and other business associates.

We communicate the company's operations openly and transparently to both internal and external stakeholders. We report on our due diligence process related to human rights in the sustainability report published annually. Terrafame is also committed to voluntarily complying, to the extent applicable, with the Corporate Governance Code maintained by the Securities Market Association, as in force from time to time.

In addition to this Code of Conduct, we undertake in all situations to weigh the significance of matters and the impact of our business operations, to make ethically sustainable decisions and to choose alternatives and solutions that promote sustainable development, as well as to act with good judgment and due diligence.

Terrafame's Code of Conduct has been drawn up in such a way that it does not conflict with the Code of Ethics of the parent company Finnish Minerals Group Oy.

Business conduct

Our goal is to instill a strong culture of doing the right thing throughout Terrafame's value chain. Our approach is based on continuous improvement, inclusion, personal responsibility, learning and integrating sustainability more closely into business planning.

Regulatory environment

Our operations are based on compliance with laws, official guidelines and regulations, as well as the company's internal policies and guidelines. We are committed to complying with international sustainability standards and guidelines and to respecting human rights in all our operations in accordance with the law and the UN Guiding Principles on Business and Human Rights.

Our operations are guided by the following international key initiatives and principles:

— UN Universal Declaration of Human Rights
— UN Guiding Principles on Business and Human Rights
— ILO Declaration on Fundamental Principles and Rights at Work
— OECD Guidelines for Multinational Enterprises
— OECD Due Diligence Guidance for Responsible Business Conduct
— UN Global Compact initiative
— UN Sustainable Development Goals.

Human rights

We consider human rights impacts in all our decision-making for all our stakeholders. In accordance with the due diligence obligation concerning human rights, we have assessed the key human rights impacts of our operations and any associated risks that we are committed to prevent or mitigate. The most significant human rights impacts of Terrafame's own operations are related to the occupational and health safety of the personnel working in the industrial area, as well as the environmental impacts of the production. In the human rights impact assessment, we have identified potential risks related to violations of workers' rights and treatment, as well as occupational, health and environmental safety in the value chain.

We continuously monitor the impact of our operations on people, the environment and human rights, and we adjust our policies to minimise and prevent negative impacts. We monitor the effectiveness of our actions together with the relevant stakeholders. More detailed policies on human rights are set out in Terrafame's human rights policy, which is available on the company's website.

Ethical principles

Acting ethically is at the core of our operating practices. We are committed to responsible sourcing practices and act fairly towards our employees and business partners. We aim to prevent risks associated with business partners by identifying and addressing them even before we start working together. We comply with applicable national and international trade sanctions, export controls and anti-money laundering regulations.

In accounting, we comply with laws and generally accepted accounting principles. By following the company's approval practices, which include personal authorisations, monetary approval rights, and segregation of duties, we reduce both legal and financial risks. We are also committed to responsibility in tax matters. We report on our tax footprint as part of the Board of Directors' report, based on the instructions of the Government Ownership Steering Department of the Prime Minister's Office.

Terrafame has zero tolerance for corruption and other unethical influence, and the company does not accept direct or indirect bribery in any form. We comply with competition law and understand that we must avoid conflicts of interest in our business operations. Anti-corruption and anti-bribery policies are discussed in more detail in the company's anti-bribery and anti-corruption policy, which is available on the company's website.

Protection of assets and data

We understand the value of Terrafame's assets and data. Trade secrets are an essential part of Terrafame's assets.

We ensure the lawfulness of the processing of personal data by complying with national legislation and the EU's General Data Protection Regulation (GDPR), as well as applying their principles in our operations in practice. In addition, we ensure the protection of privacy by ensuring that the processing of personal data is carried out transparently, appropriately and with respect for the rights of the individual. We protect our own and our business partners' data with appropriate data security practices and technical and organisational measures to ensure business continuity.

We take care of our personnel

Social responsibility and taking care of our personnel are key aspects of our sustainability work. The safety, well-being and respect for human rights of our personnel is not only in line with our values and principles of sustainability, but also a prerequisite for success in business. Our permanent target is zero accidents. Our commitment to human rights is expressed in our human rights policy.

Our values are safety, commitment and efficiency. We build a culture based on learning and continuous improvement, in which everyone has an equal opportunity to participate and develop. Everyone in our working community implements our values and helps maintain and develop our culture. Our management is guided by our Leadership Principles.

In our working community, everyone has equal opportunities to participate and succeed, regardless of their job role, educational background, age, gender, language, nationality, social or ethnic background, religion, sexual or political orientation, or other similar factors. We do not tolerate discrimination or harassment. Diversity is an asset which we seek to promote. Our collaboration with personnel representatives is based on genuine discussions and development. In addition, we create opportunities for our employees to influence through communication in the working community and personnel surveys, for example.

We promote the competence of our personnel in many ways, ranging from orientation to training. Our remuneration is fair, equal, motivating and transparent.

Environment and climate

We acknowledge our industry's increased responsibility for the environmental impacts of operations. Our operations are based on compliance with laws and regulations related to the environment, climate and biodiversity, as well as our principles of sustainable development. Terrafame's sustainability policy is available on the company's website.

Environmental impacts

We invest in extensive environmental monitoring and efficient water management. We identify the permanent and wide-ranging nature impacts of our land-use. We promote the circular economy by utilising the side streams of production, for example.

Our goal is to continuously improve our environmental performance and environmental risk management through activities that exceed official requirements. Environmental responsibility is an essential part of Terrafame's decision-making and planning, and every Terrafame employee can influence the implementation of environmental responsibility through their own everyday choices.

We also identify the need of nearby communities to access up-to-date and accurate information about the company's impacts on waterbodies, for example. This is supported by active dialogue and communication.

Climate impacts

Helping mitigate climate change with our customers by promoting low-carbon electric transport is at the core of our business operations.

Terrafame's nickel sulphate has one of the lowest carbon footprints in the industry, but we aim to continuously reduce the direct and indirect climate impacts of our own operations, in line with the target of the Paris Agreement. Another goal is also to continuously improve the company's energy performance, energy management system and energy efficiency.

Value chain

We encourage collaboration partners throughout our value chain to assess their own environmental, climate and energy impacts and to implement measures to reduce their environmental load and emissions, as well as to improve their energy efficiency.

Stakeholder collaboration

The aim of stakeholder collaboration is to build mutual understanding and trust between the company and its stakeholders. We engage in an open and transparent dialogue with our stakeholders. We communicate both positive and negative things equally. We undertake to provide accurate, truthful and reliable information about the company's business, while protecting trade secrets.

All advocacy work must be in line with Terrafame's Code of Conduct and public commitments. The parent company FMG is responsible for group-level communication with political decision-makers from a lobbying perspective. Advocacy is carried out through industry associations, in compliance with the company's Code of Conduct.

Reporting misconduct

Terrafame offers both channels to bring up concerns and grievances (a grievance mechanism) and a separate whistleblowing channel designed for reporting serious violations. The whistleblowing channel can also be used anonymously.

Reporting concerns, grievances and misconduct is an important way to identify and prevent serious risks to individuals, Terrafame as a company, society or the environment. Personnel and stakeholders are encouraged to report any activity that is observed or suspected to be in violation of the Code of Conduct and our policies.

Own personnel

In questions related to Terrafame's compliance with or interpretation of the Code of Conduct or possible violations, it is recommended that employees always primarily contact their immediate supervisor. Incidents and observations concerning occupational safety, the environment and quality, as well as suspected incidents of discrimination, inappropriate behaviour, data security and personal data protection can be reported through the company's internal channels: M-files – Jatkuva parantaminen – Luo – Valitse sopiva ilmoitus (M-files – Continuous Improvement – Create – Select the appropriate notification)

External stakeholders

Terrafame's website includes a contact form for external stakeholders, which offers a direct channel for contacting the company's various experts. In addition, the section intended for Terrafame's neighbours on the website (in Finnish only) provides a channel for the neighbourhood of the industrial area to report observations concerning dust, vibration or noise, for example. Terrafame also meets representatives of the nearby neighbourhood in annual events which provide an opportunity to discuss matters of concern directly with the company's representatives.

Whistleblowing channel

A third-party reporting channel is in place for reporting serious misconduct, and reports can be submitted anonymously. The channel is intended for reporting suspected or observed violations within the scope of the Whistleblower Act. The link to the channel can be found in Terrafame's intranet. The channel is also open to external stakeholders. A public link to the channel can be found on Terrafame's website. Terrafame is also committed to ensuring the protection of whistleblowers, in addition to what is laid down in section 5 of the Whistleblower Act, to employees of contractors operating in Terrafame's production area using the company's whistleblowing channel.

Investigation process

All reports will be processed confidentially and investigated appropriately in accordance with pre-defined processes. The process descriptions of the operation of the internal reporting channels are available to personnel on Terrafame's intranet. The initial processing of reports submitted through the whistleblowing channel is the responsibility of the investigation personnel of a third party. More detailed information on the processing of reports can be found in the notification link.

Remedies

Corrective measures will be taken as necessary and their details will be determined on a case-by-case basis. In the case of proven adverse effects caused or contributed to by Terrafame's operations, corrective measures are taken in accordance with the law and official regulations. Terrafame also strives to use its influence to remedy disadvantages in situations where the disadvantage is indirectly related to the company's operations through the value chain, for example.

Every employee has the right to raise grievances safely and without fear of consequences. Terrafame does not tolerate any form of retaliation – physical, psychological or financial – against any employee who in good faith raises concerns about suspected or actual misconduct through any reporting channel, or participates in the investigation of misconduct

Approval and supervision

Terrafame Ltd's Board of Directors has approved this Code of Conduct and the human rights commitment contained therein on 17 December 2025. In addition, the Code of Conduct was discussed in the cooperation advisory board between Terrafame and its personnel on 20 November 2025. Terrafame Ltd's CEO is responsible for the implementation of the Code of Conduct. The Chief People and Governance Officer, a member of the management team, is responsible for monitoring the application of and interpreting the Code of Conduct.

The Code of Conduct is reviewed annually and updated as necessary. The document is public and available on the company's website.

Document created	**24 September 2020**
Approved by	**Board of Directors**
Document owner	**Chief People and Governance Officer**

Version	Date	Comments
001	24 September 2020	Original
002	17 December 2025	Full overhaul