

PONSSE CODE OF CONDUCT

PONSSE IS COMMITTED TO RESPONSIBLE BUSINESS

Ponsse Group is committed to carrying out its business sustainably and responsibly. This Code of Conduct is strongly supported by our corporate values: integrity, innovation, Ponsse spirit, and customer orientation.

This Code applies to all Ponsse employees and external people, companies and communities that are closely connected to Ponsse. All Ponsse employees must act in accordance with this Code of Conduct.

We expect that parties outside Ponsse also follow these principles, where relevant, when they do business with Ponsse or on behalf of Ponsse. External parties include Ponsse's business partners, suppliers and customers, as well as the PONSSE network.

The Code of Conduct includes guidelines concerning obligations towards Ponsse's business environment, employees, business partners and society. The Code of Conduct is supplemented by other Ponsse principles and guidelines, which are available on Ponsse's external or internal websites or attached to agreements.

COMPLIANCE WITH LAWS

We always act in accordance with the laws and regulations of the country in which we operate. It is the responsibility of all employees to be aware of relevant laws affecting their job duties and in case of doubt, to seek advice to ensure compliance.

Ponsse Plc, the parent company of Ponsse Group, is listed on NASDAQ OMX Helsinki Ltd and follows the applicable corporate governance laws and regulations valid in Finland. We ensure that the information provided to the market is accurate and reported in accordance with relevant laws, stock exchange rules and corporate governance codes.

In addition to laws, we respect the cultures, customs and values of the countries in which we operate. If local practices and Ponsse's guidelines are contradictory, we primarily act in accordance with this Code of Conduct.

Ponsse's management and legal department support the organisation in matters related to legislation and regulations.

HUMAN AND LABOUR RIGHTS

We respect internationally recognised human rights, such as international basic documents related to human rights and the ILO Declaration on Fundamental Principles and Rights at Work. Ponsse is committed to complying with the UN Guiding Principles on Business and Human Rights.

We do not accept child labour or other forms of forced labour in any circumstances.

We support the freedom of association and respect the right to organise in trade unions. Our employees have the right to join or not to join a trade union and to bargain collectively.

We do not discriminate against our employees or job applicants based on age, origin, nationality, language, religion, conviction, opinion, political action, trade unionism, family relations, health, disability, sexual orientation or other personal reasons.

We seek to build a workplace that is desirable for all of our employees, where they will be treated with equal respect and dignity. We also seek to promote a culture of equal opportunity and diversity. We do not tolerate any form of disrespectful behaviour, harassment or workplace bullying.

SAFETY AND HEALTH

We provide a safe and healthy working environment in compliance with applicable laws and regulations, and are committed to continuously improving occupational health and safety. Our objective is to prevent accidents and to mitigate health and safety risks in the workplace.

We expect our personnel and the PONSSE network to take responsibility for their own safety and the safety of others in the workplace. A person who has witnessed an accident, identified a hazardous situation or made another safety observation must report it immediately in accordance with the company's or their operating environment's instructions.

We develop innovative products and services, and aim to minimise health and safety risks relating to their use. We promote these matters in our product development and with our quality assurance methods, as well as through the development of our other processes and guidelines with our partners.

ENVIRONMENT

We manage and develop Ponsse's business taking environmental aspects into account in all our activities. We follow applicable environmental laws and other practices that protect and sustain the environment in all our operating areas.

We identify the lifecycle environmental impacts of Ponsse products and services, and we are committed to developing innovative harvesting solutions in line with sustainable development. We take environmental aspects into account in our product development, monitor our environmental impacts in our value chain, and actively try to reduce environmental damage caused by our operations. We systematically measure and assess our progress against our environmental objectives and report our progress openly.

INTEGRITY AND GOOD CORPORATE GOVERNANCE

We are a trustworthy partner to our stakeholders, including our business partners, suppliers and customers. The establishment of any business relationships must be based on objective criteria.

We expect Ponsse employees to be loyal to Ponsse and to promote the best interest of Ponsse. People working for Ponsse must not exploit their position to pursue their own interests, and situations where personal interests may conflict with those of Ponsse must be avoided. In addition, situations

that could create the impression of a conflict of interest must be avoided. Employees must always be able to carry out their tasks objectively and impartially.

We are committed to responsible sourcing. We expect our business partners to comply with applicable laws and regulations. At Ponsse, we actively promote our stakeholders' responsible operations, for example, by attaching an agreement concerning responsible operations to the agreements signed with suppliers and requiring them to promote sustainability requirements in their own supply chains. We always confirm agreements made with our suppliers and partners in writing, and we document them carefully.

We are committed to combating corruption in all its forms, including extortion and bribery. We do not use bribes or other unlawful payments, nor do we authorise these payments to gain or maintain business.

We neither offer nor accept any favours, gifts or benefits which could be reasonably assumed to influence decision making inappropriately or even give such an impression. We abstain from hospitality within the limits of normal entertainment expenses.

We require that Ponsse's cooperation and sponsorship agreements are in line with this Code of Conduct and support Ponsse's corporate image. We openly communicate Ponsse's major partnerships and donations on our website.

MONEY LAUNDERING

We do not accept or facilitate money laundering, and we comply with legislation related to the prevention of money laundering everywhere in the world. We know who our business partners are. We conduct business only with reputable parties involved in legitimate business activities, with funds derived from legitimate sources.

FAIR COMPETITION

We promote fair and honest competition. We comply with applicable competition laws regardless of the market area, and refrain from entering into or carrying out any illegal practices. We do not violate competition laws, for example, by discussing delicate matters, such as prices and anti-competitive practices, or by agreeing them with our competitors.

COMPANY ASSETS AND INFORMATION

Employees are responsible for taking good care of Ponsse's assets, including physical and intellectual property, as well as financial assets. Employees are obliged to use assets only for legitimate business purposes and to protect them from loss or inappropriate use. Our assets may not be used for unlawful or improper purposes.

We expect our employees to process Ponsse's or its stakeholders' sensitive information with the utmost confidence and appropriately ensure confidentiality. We respect and protect personal data, and employees processing it are expected to exercise special caution when collecting, using and storing data.

IMPLEMENTATION AND COMPLIANCE

At Ponsse, supervisors are in charge of introducing the Code to existing and new employees. Failure to act in compliance with this Code may result in appropriate disciplinary actions.

We encourage our employees and other stakeholders' representatives to report any possible concerns or violations of this Code to the management of Ponsse. Our employees should contact their own supervisor or a human resources representative in the first instance. All stakeholders' representatives can report an incident using their own name or anonymously through Ponsse's ethical whistleblowing system. Reports are investigated confidentially and impartially by Ponsse's Whistleblowing Team. There will be no adverse consequences for any persons reporting such violations in good faith. A link to the whistleblowing system maintained by our external partner, and further information about the whistleblowing system and processing of reports, is available on Ponsse's intranet and on our website.

UPDATING AND FURTHER INFORMATION

The Board of Directors of Ponsse Plc has approved this Code of Conduct on 8 June 2020. This Code of Conduct is an update of Ponsse's first Code of Conduct, approved by the Board of Directors on 12 December 2016. The Board of Directors regularly reviews the content of the Code of Conduct and updates it when necessary.

Additional instructions concerning the application of this Code may be given in separate guidelines. If questions arise regarding the interpretation of the Code or compliance with it, please contact Ponsse's Chief Financial Officer (CFO) Petri Härkönen.