

# Code of Conduct

Hyvän toimintatavan periaatteet

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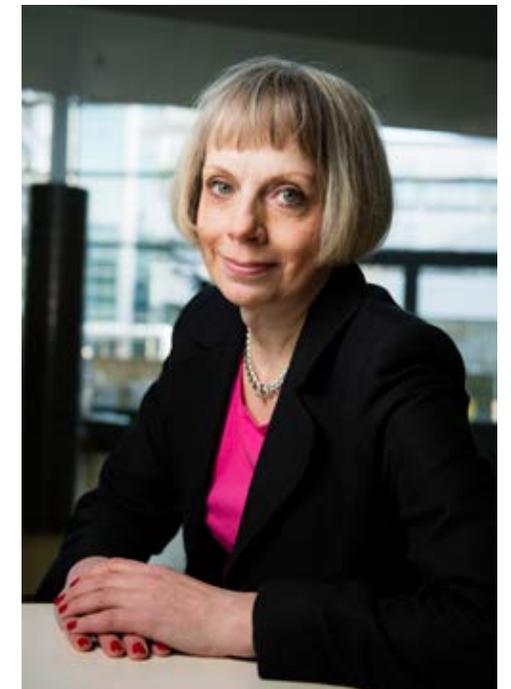
## Introduction

In accordance with Luke's strategy, we use research to create well-being and a sustainable future from renewable natural resources. Our research produces value and solutions to our customers - locally and globally. We develop our operations and operating models continuously and monitor the quality, responsibility and ethics of our operations.

In addition to the strategy, Luke's work and activities are governed by our Code of Conduct and our values. The Code of Conduct outlines the ethical principles according to which everyone at Luke works. The Code of Conduct thus forms a foundation for all Luke's operations and describes how we work and treat our personnel, partners and customers. As a research institute, it is extremely important to us that our work is of high quality, ambitious and reliable. Ethical standards of research, the neutrality of research and responsibility are the cornerstones of everything we do.

The principles of the Code of Conduct help us in our everyday work to identify the correct ways to act and to prevent any harmful practices. At Luke, we are firmly committed to acting according to these principles. The Code of Conduct applies to us all, and we expect that not only we but also our partners observe it.

*Johanna Buchert*



## Statutory procedures and good governance

- Luke is a public research institute that is governed by the Act and Decree on the Natural Resources Institute Finland.
- In addition to scientific research, Luke has certain statistics-related and other official duties based on legislation and regulations.
- Observing laws and regulations is the basis of all our operations. We observe good governance, i.e., we act according to the principles of independence, neutrality and impartiality. We operate in a transparent way and openly report on our operations.
- Luke's official duties and activities related to statistics are based on scientific data, and they are executed in accordance with the responsible conduct of research and the Statistics Code of Practice.
- We guarantee the privacy of data providers and the absolute confidentiality of the data provided by them.
- In our statements and reports, we take the different branches of science that Luke represents into account according to the "One Luke" principle.
- We act in good cooperation with our partners, and expect them to observe Luke's statutory procedures and the principles of good governance.



### *Here's how I must act*

I follow good governance and use resources wisely.

I observe the obligations of confidentiality and secrecy.

I ensure that the relevant permissions are in order.

I ensure for my part that agreements are primarily made in writing and that the agreements are in Luke's interest.

I base my comments and statements on objective scientific data.

I consider the instructions concerning statements and reports in my actions.

In any unclear situations, I contact my supervisor or Luke's legal department.



## Ethics and best practices of scientific work

- In all our research activities, we are committed to the guidelines for the responsible conduct of research published by the Finnish National Board on Research Integrity (TENK). Every researcher is responsible for the responsible conduct of research.
- In research activities and official duties and as a statistical authority, we act impartially, independently, honestly and responsibly, observing high ethical standards of science.
- Our research operations and official activities are scientifically at a high level and based on principles generally accepted by the scientific community. Our statistics activities are carried out in accordance with the principles of the statistics field and the European Statistics Code of Practice.
- We follow the principles of open science. We invest in the open sharing of research materials and treat all users of the data and statistics we produce equally.
- We follow the guidelines issued by TENK on the ethical principles of research with human participants and ethical review in the human sciences in Finland.
- We take animal welfare into consideration in experimental research.
- Research information we produce with public funding is openly available, ensuring the quality, openness and reliability of our research.
- Through customer-funded projects, we develop the social effectiveness of research, and act in them confidentially and according to the same ethical principles as in other research activities.



### *Here's how I must act*

I take the questions related to ethics into account already when planning my research or preparing my applications for funding.

I act according to the Luke project model.

I secure the best experts and resources for my project to ensure a high-quality end result and customer satisfaction.

I make sure that research data produced with public funding is openly available.

Before publishing research results, I verify the need to protect them and their potential for commercialisation. I file a notification of invention in good time to secure the commercialisation of research.

If I detect any breach of research ethics, I contact the researcher or team in question.



## Stakeholder activities and societal engagement

- Our objective is to use research to produce:
  - welfare and sustainable future from renewable natural resources to society
  - value and solutions to our customers
  - impartial and independent information to support decision-making, social debate and sustainable and profitable operations in industries in the natural resources field.
- Our operations are networked and effective. They proactively support decision-making, the competitiveness of trade and industry, and balanced regional development.
- We work in cooperation with national and international partners, as well as companies and citizens.
- We promote social debate based on scientific information. We increase cooperation between producers of information and various stakeholders and ensure and maintain citizens' trust in research-based decision-making.
- We encourage our experts to participate in social debate and be visible in traditional media and the social media within their own area of expertise, as well as to bring perspectives based on scientific information to the debate.
- In societal engagement, we act impartially and ethically and indicate the uncertainties and limitations related to scientific information.
- When communicating about research results, we follow the principles of ethical scientific communication.



### *Here's how I must act*

I make sure that the principles of neutrality and independence are implemented in my specialist duties.

I familiarise myself with Luke's instructions on communication.

The solutions and recommendations I produce are based on studied scientific information.

In all my public actions, I clearly indicate the role in which I participate in the discussion: whether I'm acting as a private individual or a representative of Luke.

I always act honestly and never advance my own interest in my role as a researcher, or attempt to influence decision-makers or stakeholders in order to promote my own interest.

I openly report if I act as a private individual in civic organizations or interest groups related to my field of research.

If I detect any activities that conflict with these operating principles, inappropriate influencing or, for example, attempted bribery, I report the matter immediately to my supervisor and the Senior Vice President of Administrative Affairs.



## Confidentiality and protecting data

- In all our processing of personal data, we observe the obligations concerning data protection and confidentiality, as well as the information security regulations of the government administration.
- We always handle the business and trade secrets of our customers and other partners confidentially, regardless of whether the information is related to an actual or a potential customer relationship.
- We respect the privacy of our customers and employees.
- We handle data appropriately and securely, observing a good practice on information management.
- We implement the measures required by data protection legislation to protect the rights of data subjects.
- Our personnel is trained in the secure handling of information. We maintain and continuously develop our competences related to information security.
- We disclose information in accordance with our guidelines on the disclosure of information and the requirements of the relevant legislation.



### *Here's how I must act*

I participate in data protection and information security training on a regular basis.

I act in accordance with our guidelines on data protection, information security, the disclosure of information and confidentiality.

I identify confidential information, such as customer information and other business or trade secrets, and ensure their appropriate and confidential handling.

In questions related to data protection and information security, or any non-conformances concerning them, I contact the data protection officer or information security manager when necessary.



## Operations based on the values of our working community

- All our operations are guided by the basic values we have defined for ourselves. Are shared values are as follows:
  - **Impartiality and impact.** Everything we do is based on scientific information, and our work has an effect on the world. Our operations are transparent and open.
  - **Trust and openness.** We are worthy of trust and appreciate each other's work. We are flexible about working hours, workspaces and mobile work.
  - **Cooperation and respect.** We work in good cooperation with each other and with our stakeholders - #moretogether!
  - **Courage and enthusiasm.** We inspire each other and encourage bold discussion and decisions, as well as the development of our working community.
  - **Sustainability and responsibility.** Our operations are guided by the principles of sustainability and responsibility.
- We openly present our values when recruiting new employees. We expect that both new and old Luke employees commit themselves to the values of our working community.
- We believe in the power of example: anyone can be an ethical leader at Luke, regardless of their position! However, supervisors bear a special responsibility for setting an example and ensuring smooth everyday work that is consistent with our values within our working community.
- We value diversity and observe the principle of equal treatment in recruitment and all other practices, instructions and procedures related to employment relationships.
- We implement a constant caring model at Luke and maintain our personnel's wellbeing at work.
- We encourage finding a good balance between work and private life through the use of flexible working hours and the possibilities of mobile work.
- We invest in continuous on-the-job learning and professional development.
- We do not accept harassment, discrimination or any other inappropriate treatment at the workplace.



### *Here's how I must act*

I undertake to act in accordance with Luke's values in all situations.

I follow Luke's Code of Conduct.

I familiarise myself with Luke's guidelines on wellbeing at work and occupational safety and health and act accordingly.

I accept the fact that we all sometimes make mistakes. I act in accordance with the constant caring model and boldly and directly bring the matter up with the people involved if I notice any activities that conflict with the values of our working community. If necessary, I resort to the official reporting procedure.



Glasses

Glasses

Luke  
[Photo]  
[Name]

## Safety culture

- We ensure occupational safety and a safe and clean work environment, and identify, prevent and rectify potential causes of hazard.
- We observe instructions and guidelines concerning occupational safety and health and the safety of premises, and uphold Luke's safety culture together. Supervisors bear a special responsibility for the implementation of the safety culture.
- We train our personnel in matters concerning safety. We maintain our competences and qualifications to be able to anticipate the risks of our work and act appropriately in situations involving disruption.
- We maintain appropriate contingency, emergency and continuity plans that secure the undisturbed continuation of our operations.
- We do not accept any threatening or otherwise inappropriate behaviour towards our personnel.



### *Here's how I must act*

I follow Luke's safety instructions and immediately report any defects, hazards, near misses and safety threats I detect to my supervisor, the labour protection officer or the safety manager.

I use protective equipment as instructed and ensure that others do the same.

I follow the instructions for using machines and equipment.

I use and store my tools carefully, keep them in an appropriate condition and only use them for my work duties.

When planning a work trip abroad, I verify the safety situation in the destination country, read Luke's travel guidelines, know my responsibilities and follow the provided instructions.



## The environment and climate

- In line with our strategy, we produce solutions to local and global environmental and climate challenges through research activities.
- We follow the principles of Luke's new environmental policy in our operations.
- We study the sustainable and responsible use of natural resources with a comprehensive approach, taking into account the principles of sustainable development and the environmental impact of our operations.
- In our operations, we observe the requirements of an environmental management system for research platforms implemented in accordance with the ISO 14001 standard.
- At our Helsinki office, we observe the WWF Green Office environmental management system, which includes energy-saving technical solutions and practices, decreasing waste and taking the environment into account in procurement.
- We encourage climate-friendly practices by favouring remote meetings, decreasing travel and encouraging the use of public transportation. The multi-locational work environment and modern tools that we are using support remote work.
- We ensure that our personnel have the necessary competences in environmental matters required by their duties.



### *Here's how I must act*

I take Luke's strategy, vision and mission into account when planning new research projects.

I take responsibility for the environmental impact of my activities and take the principles of Luke's environmental policy into account.

In everything I do, I follow the principles of sustainable development and decrease the environmental load.

- I save energy.
- I decrease the amount of waste.
- I favour walking, cycling and public transportation.
- I strive to decrease unnecessary travel.



## Responsible procurement

- In matters related to procurement, we follow the procurement legislation, contractor's obligation legislation and Luke's procurement guidelines.
- We observe openness, non-discrimination and the equal treatment of tenderers in the procurement process.
- We take questions of disqualification and commitments into consideration as part of the responsible procurement process.
- We engage in cooperation with reliable partners that operate ethically, responsibly and in accordance with the relevant legislation.
- We set clear requirements and suitability criteria and, where possible, comparison criteria that support responsibility for items to be procured.
- We carry out responsible and sustainable procurement in accordance with Luke's values.
- In our procurement, we take safety, climate and environmental aspects into account, among other things.
- Where possible, we favour joint procurement through Hansel, where responsibility considerations play a central role.



### *Here's how I must act*

I contact Luke's procurement support when starting preparations for a procurement.

I use online procurement channels in accordance with Luke's procurement guidelines.

I assess my potential disqualification myself. In a situation involving disqualification, I recuse myself and do not participate in the processing, decision-making or agreement preparation for the procurement.

During competitive tendering, I do not participate in customer events organised by suppliers participating in the tendering and am not in contact with them.

I check the background of a party to an agreement carefully before committing to the agreement, and monitor the actions of the party during the agreement period.

Where possible, I choose services and products marked with environmental labels, and I also take into account energy markings, the environmental labels of the materials and the whole lifecycle costs of the procurement.

During the agreement period, I address any defects in writing and contact Luke's legal department, if necessary.



## *Financial management, bribery and corruption*

- In our financial management activities, we observe the currently valid legislation and official regulations, as well as Luke's rules of procedure and financial regulations.
- We take care of Luke's property responsibly and appropriately.
- We ensure responsible project finances and the responsible use of Luke's funding.
- We ensure sufficient resources and their efficient use.
- We avoid the occurrence of financial conflicts of interests.
- We carry out research funded by customers in a transparent, balanced and impartial way, following a consistent pricing practice.
- We do not tolerate any kind of bribery or corruption that could inappropriately affect our operations or decision-making or threaten our impartiality.



### *Here's how I must act*

As a project manager, I understand my important role in the implementation of responsible project finances throughout the whole of Luke. Because of this, I ensure that project finances are managed as well as possible.

I follow instructions issued by Luke and the authorities on accepting gifts and hospitality.

I can only give or accept personal gifts with a low value, including hospitality related to our research and customer work. Acceptable hospitality and gifts are given openly, are occasional in nature and do not result in any obligations or expectations for a favour in return for the party giving or receiving the gift.

In any unclear cases, I refuse the gift or hospitality or check with my supervisor in advance whether it is acceptable.



## Conflicts of interest

- Osallistumme vain lailliseen, hyväksyttävään ja arvojemme mukaiseen toimintaan.
- Kaikessa asioiden käsittelyssä ja päätöksenteossa ajattelemme Luken etuja ja velvollisuuksia, emmekä hyväksy oman tai läheisen edun tavoittelua työtehtävien hoidossa.
- Huomioimme toiminnassamme mahdolliset jääviydet, sidonnaisuudet tai sivutoimet sekä mahdolliset eturistiriitatilanteet, joissa vastakkain voivat olla Luken ja henkilökohtainen taloudellinen tai sidonnaisuuteen liittyvä etu.
- Vältämme tilanteita, jotka vaarantavat Luken toiminnan uskottavuuden ulkopuolisten silmissä tai jotka aiheuttavat taloudellista tai mainehaittaa Lukelle.
- Kunnioitamme perusoikeuksia, kuten sananvapautta, mutta otamme kuitenkin huomioon, että palvelussuhteissa niitä voivat rajoittaa lojaliteetti- ja salassapitovelvollisuudet sekä kilpailevan toiminnan kieltö.
- Henkilökohtaiset ystävyys-, sukulaisuus- tai sidonnaisuussuhteet eivät vaikuta päätöksentekoomme. Toimimme Lukessa omilla ansioillamme ja omalla osaamisellamme.



### *Here's how I must act*

I familiarise myself with Luke's guidelines on disqualification, commitments and secondary occupations, and take the relevant provisions into account in my actions.

If I suspect that I am disqualified or notice conditions that can be considered as a conflict of interests, I contact my supervisor or Luke's legal department.

I recuse myself if it can be expected that the processing of a matter may lead to financial or other benefit to myself, my immediate circle or a community they represent.

I present Luke's opinion impartially and neutrally when representing Luke, for example, in working groups or through statements.

I act responsibly in situations where it is possible that I will be perceived as Luke's representative, even if I'm acting as a private individual.



## Intervention and reporting

- Activities that violate Luke's values or Code of Conduct could weaken our reputation, compromise the trust in our operations and cause us damage and harm.
- It is the responsibility of everyone at Luke to observe the Code of Conduct, intervene in any defects and report them to protect our common interest.
- To ensure the appropriateness of our operations, it is our duty to intervene in any activities that violate legislation and regulations. We are obligated to report any suspected violations of law, as well as any activities that are in breach of this Code of Conduct or Luke's other internal guidelines or that are otherwise unethical.
- Openness and reporting on defects promote our responsibility and enable anticipating similar situations in the future.
- We do not tolerate any negative consequences resulting from intervention in misconduct and reporting it, such as threats or harassment. Any deceitful reports are not tolerated.
- The management and supervisors have a special obligation to follow the Code of Conduct and identify any suspected violations, as well as to set an example in highlighting the importance of following the guidelines within their working community.
- All reports are reviewed and processed confidentially and impartially without any undue delay, and in accordance with the requirements of regulations concerning reporting procedures



### *Here's how I must act*

I set an example and follow Luke's values and Code of Conduct.

I intervene myself or report to my supervisor, their supervisor or Luke's legal department if I notice or suspect any activity that violates the Code of Conduct, legislation or regulations.

I can also submit a report through Luke's reporting channel, anonymously if needed.





NATURAL RESOURCES  
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