



# HUB logistics – code of conduct

Ethical guideline to our employees



Ethical conduct is the cornerstone of our company, and its significance is growing day by day. Each of us must adhere to the ethical guidelines, as they are an essential part of how we want to present ourselves to the world. Ethical guidelines steer our actions according to the principles of fairness, honesty, and responsibility.

By following ethical guidelines, we build a strong foundation that supports our company's reputation and long-term success. It helps us establish trust among our customers, partners, and employees. It also ensures that we operate in a sustainable manner, considering the needs of the environment and society.

Together, we can set an example of how ethics and responsibility are core values of our company, making us proud of our affiliation. The guidelines instruct us on how to conduct our business to achieve our goals in a reliable and sustainable manner. Each of you is part of this important journey, and I hope you are committed to acting in accordance with our ethical guidelines.

Thank you for being part of this significant team and sharing our common values.

Joni Sundelin, CEO



## Summary

The ethical guidelines define our ethical principles, and the guidelines apply to every HUB employee at all levels of the organization. Our entire staff is committed to adhering to this ethical guidance in their work.

In addition to following the guidelines, sound judgment should be exercised, and honesty should be maintained in all situations. Supervisors ensure that the guidelines are accessible to employees and discuss them with the staff. The guidelines are available on the intranet and are reviewed as part of the orientation program.

We are committed to responsible operations concerning the environment, social responsibility, and the economy.

Our actions are guided by integrity, consideration of conflicts of interest, and respect for trade secrets.

Our customers are at the center of our operations. We understand our customers and act in their best interest.

We operate openly and transparently, adhering to the laws, agreed-upon rules, and best practices that guide our operations.

We are dedicated to implementing sustainability, equality, and equal opportunities in our compensation and career development processes.

We ensure a safe and healthy working environment for all our employees.

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# Objectives

Our vision is to be the fastest-growing and evolving logistics partner in information and material management. To achieve this, we must be a reliable partner from various perspectives. We need to conduct our business in accordance with ethical principles, established laws, and good practices. Adhering to laws, along with our own rules and regulations, prevents inappropriate behavior and allows intervention when necessary.

Our ethical guidelines help ensure that all employees understand our ethical principles and adhere to them. We require all employees to follow ethical principles and the legislation relevant to our organization in their daily work.

Our ethical guidelines establish key moral principles that guide the actions of each of us, both personally and as an organization. It provides concrete guidance for our operations and forms the foundation of our activities. The guidelines also describe how we handle relationships with customers, business partners, employees, and other stakeholders. Our guidelines communicate to our stakeholders, the communities in which we operate, and the world at large, the kind of organization we are and how we operate.



# Our values guide our actions

## **Active development**

We develop as one team. We create solutions together with customers and partners, celebrating achievements together.

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## **Appreciation**

We value our work and each other. We respect all roles, support diversity, and foster a sense of belonging.

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## **Engagement**

We understand our operating environment and recognize the significance of each individual task as part of the whole.

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## **Customer-centricity**

We are dedicated to the success of our customers. We focus on the customer experience and approach the surrounding world with curiosity.



# Part 1: A prosperous work community



# Equality and non-discrimination

We operate justly and fairly towards all our employees, valuing the worth and privacy of each individual. Temporary employees are welcomed on an equal footing with permanent employees. We recognize the individuality of our employees, creating a work environment that considers various needs and working methods.

We are committed to implementing responsible, equal, and non-discriminatory practices in our salary and career development processes. We evaluate individuals based on competence, skills, and accumulated experience. In recruitment, we emphasize the applicant's qualifications for the specific position. We pay equal wages for equal work, taking into account the employee's skills, years of work experience, and educational level.

We do not tolerate any form of discrimination, intimidation, physical or mental bullying, or harassment in our workplace. We address all cases of bullying and harassment immediately. We adhere to good management practices, including the equal treatment of staff.

All our employees are equal. No one is discriminated against based on age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, health, disability, sexual orientation, or any other personal reason.





## Exemplary leadership

Our leadership is based on openness, sincerity, courage, and trust.

We expect leaders to treat everyone fairly and equally. No one should be treated unfairly. We require all company supervisors and leaders to adhere to these principles. If we observe or suspect misconduct, we will address it immediately.

A leader's role is to set an example and follow common practices. Our leadership is committed to acting diligently and in the best interest of the company.

Corporate leadership must not act in their own interest because their decisions and actions can have broad impacts on the well-being of the company and its stakeholders, including employees, customers, and shareholders. Leaders must prioritize the company's interest and avoid conflicting interests that could lead to unethical or illegal conduct, harm the reputation, and undermine the organization's long-term success.



## Employee development

We encourage our employees to develop in their roles and expand their expertise. We expect staff to participate in courses and training to maintain their professional skills and knowledge.

We encourage versatility and enriching work both for individual interests and unit development. We offer development opportunities so that our employees can handle various tasks competently.

We maintain statutory qualifications, ensuring that employees have sufficient expertise to succeed in their work. We regularly organize inductions and training related to tasks and occupational safety.

# Safe work environment

We take occupational safety and employee protection seriously. We follow all safety rules and regulations, committing to ensuring the safety and good working environment of our employees.

We actively and comprehensively develop occupational safety. Occupational health and safety practices are based on assessments, anticipation, and risk management at the group and local levels. Employees are expected to take responsibility for their health and safety, following occupational safety instructions and rules.

We are a substance-free workplace. Any use, presentation, or encouragement of substance use is not part of our practices. Working under the influence of substances or drugs is strictly prohibited.



# Loyalty, honesty and openness

Employees must focus on and contribute to the company's affairs and business. We expect our employees to perform their tasks carefully and in the best possible way for the benefit of the company. Our employees always act as representatives of the employer. Employees must act in the company's interest and not cause harm to the company or its owners with their actions.

We operate honestly and openly in all aspects of our business. Openness promotes the resolution of potential conflicts and disputes. We seek help if something is unclear. We report immediately any misconduct we observe and handle it appropriately.

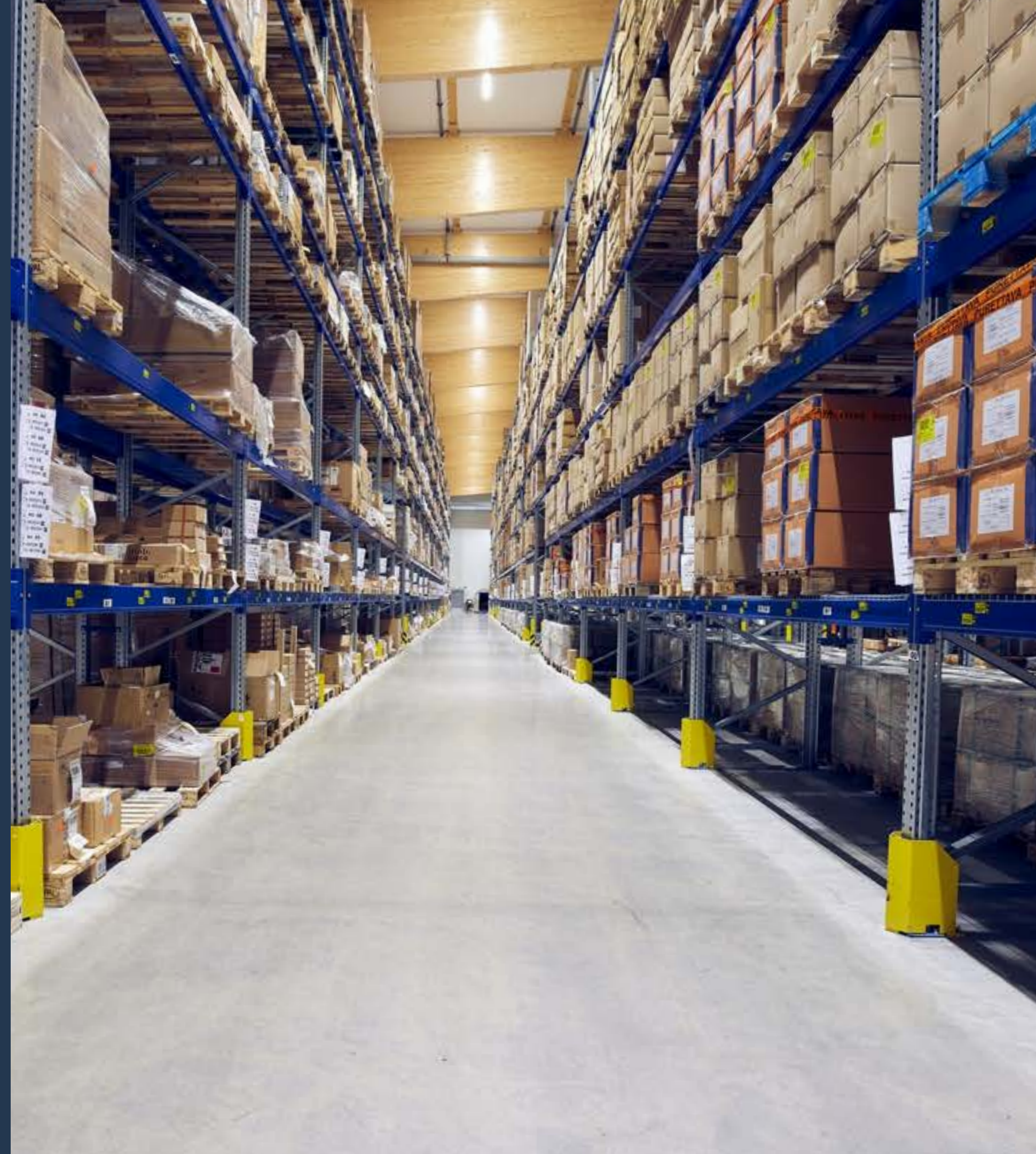
We communicate openly about our company's matters both internally and externally. Through honest and open communication, we maintain the reputation and success of our company in the competition. In all our activities, we strive to protect our trade secrets, assets, brand, and trademarks. Designated responsible individuals are in charge of communication.



# Part 2: Company

Compliance with laws, agreed rules, and operating principles

Our good governance is based on compliance with applicable laws, regulations, and directives, as well as active monitoring of our own practices and procedures.





## Company property

Company property should not be acquired for personal use, and it should not be used, transferred, or modified without permission. Company property must not be stolen, damaged, or destroyed, and physical property must be handled with the utmost care.

Employees are expected to promote and protect HUB's corporate image through their actions and behavior.

We expect our employees to protect the company's tangible and intangible assets, such as physical assets, hardware, office equipment and supplies, information systems, software, patents, trademarks, copyrights, and other proprietary information and expertise.

“Our actions are guided by integrity, consideration of conflicts of interest, and respect for trade secrets.”



## → **Respect for trade secrets**

We ensure the confidentiality of business operations. We respect trade secrets and the confidentiality of business information. We do not disclose confidential information of stakeholders, such as trade secrets, undisclosed business-related information, or confidential personal information, to external parties.

## → **Non-bribery**

Corruption and bribery are strictly prohibited practices. We do not accept bribes, gifts, or other benefits that could compromise our objectivity and honesty. We do not engage in illegal or unethical activities, such as theft, fraud, or corruption.

During a tender process, we do not participate in events organized by companies participating in the competition. These guidelines equally apply to activities related to authorities, political parties, or their representatives.

If we suspect fraud, bribery, or other misconduct, we report it immediately to our supervisor or the Whistleblowing system.

# Conflict of interest

We avoid situations where personal interests might cause conflicts of interest in our business.

Decision-making and issue preparation must be impartial and independent. Disqualification, or recusal, is a potential conflict of interest that means a person's inappropriateness to participate in preparing or resolving an issue.

Our employees must not, under any circumstances, offer direct or indirect support to political parties, organizations, or individual politicians to achieve their business advantage.

Members of the board, company management, and decision-making employees must disqualify themselves from decision-making due to conflicts of interest if their own or their close associates' personal interests may conflict with the company's interest. This could jeopardize the impartiality and honesty of decisions and undermine trust in the organization.

Disqualification helps prevent unethical actions and ensures that decisions are always made in the best interest of the company.



# Part 3: Stakeholder activities



## Board work

Board members act in the interest of shareholders. This means making decisions that promote long-term value creation and ensure the company's sustainable success. In decision-making, board members commit to considering all stakeholders, including shareholders, employees, customers, suppliers, and communities. A balanced focus on different stakeholders helps promote long-term sustainability.

## Customer-centricity and expertise

Our customers are at the center of our operations. We understand our customers and their business. We are skilled and knowledgeable in all our tasks. We never provide customers with incomplete or misleading information. Our actions are always guided by the interests of our customers and other partners. We treat our customers fairly in compliance with competition laws.

We regularly review the fulfillment of supplier requirements in cooperation meetings, supplier audits, and contractor liability inspections. We expect our subcontractors to:

- Adhere to international laws and applicable national legislation and regulatory requirements.
- Respect internationally recognized human rights as stated in the Universal Declaration of Human Rights.
- Adhere to international labor rights as documented in the International Labour Organization (ILO) conventions.
- Ensure the occupational safety and health of their employees.
- Comply with national minimum wage and working hour legislation.
- Conduct business in an environmentally respectful manner, adhering to applicable environmental laws and standards.
- Reject fraudulent forms of business relationships, such as bribery, money laundering, or corruption.
- Commit to providing necessary information about their corporate responsibility management, including economic, social, and environmental responsibility aspects, depending on HUB's annual GRI reporting requirements.

## Supplier code of conduct

We require adherence to our ethical principles from our suppliers, subcontractors, and other collaborators.

We use the Supplier Code of Conduct principles. Our subcontractors commit to following the practices defined in the ethical guidelines as well as quality and responsibility requirements in their operations.



# Part 4: Community and sustainability

# Our sustainability program

	 Meaningful work	 Safe working environment	 Profitable growth	 Towards greener logistics
<b>Objective</b> 	Each and every employee at HUB is proud of the work they do	It is safe to come to work every day of the year	Value-producing HUB.	Reducing emissions annually
<b>KPI</b> 	People power general index People power engagement index	Number of work accidents/ MTI, LTI1, LTI4 Number of occupational safety observations Sickness absence rate	Increase in turnover Ebt	Carbon footprint, CO <sub>2</sub> -emissions Recycling rate
<b>Actions</b> 	Annual personnel survey and determined measures based on the results, both at the group level and at each location.	Active safety communication Preventive work to prevent accidents	Adherence to good governance Risk analyses Acquisition of new customers and development of current customers Responsible procurement	Commitment to annual emission reduction Improving the recycling rate by different means

ISO certificates create the basis for high-quality and sustainable operations.  
Equal and equitable operation. Sustainable development goals.



## Community and responsibility

We are active and responsible members in our local communities.

We encourage our employees to participate in charity work and volunteer activities. As a company, we make at least one annual donation to charity.

We support children's and youth sports through sponsorship.

We adhere to the goals and measures outlined in our sustainability program.

"We are committed to responsible practices in terms of environmental, social responsibility, and economic aspects."



## Responsible Procurement

We procure high-quality raw materials, products, and services.

We support domestic and local expertise by procuring domestic products and services when possible.

We consider the lifespan and environmental impacts of products, equipment, and machinery.

We take into account and assess the recycling possibilities of products. Our purchasing policy guides our operations in procurement.

# We respect our environment



The foundation of our environmental responsibility is the ISO 14001 environmental management system, which provides a strong basis for our environmental work. We consider environmental and climate impacts in our operations and encourage each employee to make ecologically sustainable choices in their daily lives.

We are aware of the environmental impacts resulting from our activities and take them into account in all decision-making. Through responsible procurement and investing in environmentally friendly alternatives, we can reduce the environmental impacts of our operations. We are committed to reducing emissions systematically.

When operating in our client companies' premises and as part of our clients' production, we aim to support our clients in achieving their sustainability goals. We support and encourage our customers, for example, in energy-saving measures and waste audits.



## Ethics in our business and financial responsibility

The financial responsibility of our company involves a continuous effort to maintain profitable business operations while considering the expectations of our stakeholders. Our goal is to be a profitable player and to maintain and further employ jobs.

Profitability enables continuous growth and the maintenance of our competitiveness. It is also essential for us to take care of our staff and fulfill our social responsibilities. Economic growth must be achieved through responsible and ethical means.

### Misconduct and prevention

If an employee or any person otherwise associated with our organization suspects misconduct, they can report it through the whistleblowing channel. As the data controller, we protect privacy and handle personal data collected through the whistleblowing channel in accordance with data protection legislation and good data protection practices.

***If you suspect a violation of ethical principles, you should report it immediately to your supervisor or through the whistleblowing channel.***