



# Code of Conduct

## Code of Conduct

**The purpose of this Code of Conduct is to help us all to comply with laws and regulations and to act ethically and responsibly.**

We all make an impact. It is each and every one of us that makes Posti a responsible business partner, valued employer and good corporate citizen. This Code of Conduct contains key rules and instructions that all Post employees and Posti must follow.

The Board of Directors of Posti has approved this Code of Conduct on [April 28, 2021].

**COMPLIANCE** is observing and complying with the local laws and the applicable Posti policies, rules and guidelines – especially this Code of Conduct – in every country where we operate.

**INTEGRITY** is the conformity between the values and the actions of a person – i.e., always choosing the correct behavior in any given situation, even if no one is monitoring. Posti strives for ethical and responsible culture.

We also expect our stakeholders - our customers, partners and subcontractors - to comply with this Code of Conduct and its principles.



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# We Comply With The Laws And Regulations And We Are Responsible

**We must all comply with the laws and regulations applicable to Posti's operations. We demonstrate through our honest and ethical practices that we value and respect each other, our customers and partners, and our environment.**

**We achieve Posti's business objectives by means and behaviour that are in line with our Values and Leadership Principles.**

**We keep our promises. We are reliable and responsible as people and as a company. We adhere to a high standard of data protection in all our operations.**

All employees must always comply with the applicable laws and regulations as well as governmental guidelines and instructions in all Posti's operations. We do not accept any non-compliance, and we never urge or instruct anyone to break law or regulations. If laws and regulations deviate from the rules set in this Code of Conduct, we act by the stricter rule.

Every manager must set an example and be familiar with the laws and regulations related to their area of responsibility, comply with them, and know the consequences of non-compliance. Any possible non-compliance must be addressed.

## IN PRACTICE:

1. In our operations, we comply with the laws, regulations, and governmental guidelines, and we monitor the development of legislation.
2. As leaders, we demonstrate our commitment to the compliance culture and to compliance with laws and regulations. We regularly inform our subordinates about the importance of complying with laws and regulations and monitor the compliance. We require participation in mandatory training. Suspected misconduct will be investigated.
3. Our customers, suppliers and other stakeholders expect us to act professionally, responsibly, honestly and efficiently – and that is what we do. We focus on solutions and useful outcomes and act proactively.
4. We ensure that we operate safely and promote a safe work environment.
5. We keep good manners in mind in every situation
6. We communicate honestly and openly. We understand that our activities in our free time can also affect Posti's reputation. If I am not the appointed representative, I do not make a public statement on behalf of Posti. If I am asked for a comment, I shall always forward the request to the right, designated representative. When posting on social media, I clearly state that my opinions are my own personal opinions, not Posti's official.
7. We do not publish information that could harm Posti, its customers or other employees.
8. If we do not know how to interpret the rules, we ask for an advice.

# Human Rights, Equality And Non-Discrimination

**We adhere to fair employment practices and respect all internationally accepted human rights.**

All employees are treated fairly and equally, regardless of race, religion, gender, political opinion, age, nationality, sexual orientation, civil status, or disability. Equal pay for work of equal value is promoted in all positions within Posti. Wages and benefits must, at the very least, meet the statutory minimum requirements.

The strength of Posti is the diversity of our employees. Our employees have cultural backgrounds from more than 80 countries. We want to promote a work community, where all employees feel themselves accepted and where everyone can do her/his best and succeed every day.

We expect our suppliers, customers and partners to adhere to the same human rights principles.

We respect the human rights as defined in the UN Universal Declaration of Human Rights and basic labour rights defined by the International Labour Organization (ILO). We respect the freedom of associations and the right to collective bargaining. We encourage our employees to engage in dialogue with the company's management and report any grievances.

We do not use child or forced labour, and we do not co-operate with suppliers or subcontractors who use such labour.

## IN PRACTICE:

1. We do not tolerate harassment or offensive behaviour, whether it be sexual or otherwise personal in nature.
2. We do not accept any form of mental or physical, direct or indirect harassment or violence. Violence always leads to termination of employment. Offensive and inappropriate behaviour is not tolerated.
3. We do not accept child or forced labour in any form.
4. We respect the freedom of associations as well as freedom of being represented by trade unions and other employee representatives in accordance with local laws.



We expect our suppliers, customers, and partners to adhere to these same human rights principles. For more information, see the detailed principles set out in the Supplier Code of Conduct.



We respect all internationally recognized human rights and conduct our business in accordance with international and regional human rights initiatives, including:



1. United Nations Universal Declaration of Human Rights (1948)
2. International Covenant on Civil and Political Rights (KP Convention, 1966)
3. International Covenant on Economic, Social and Cultural Rights (TSS Convention, 1966)
4. The core labour rights conventions of the International Labour Organization (ILO)
5. The ten principles of the UN Global Compact
6. UN Guiding Principles on Business and Human Rights
7. OECD Guidelines for Multi-national Enterprises

For additional information, see also Posti Suppliers Code of Conduct.

# Ethical Business Practices

## Corruption and bribery

Corruption means abuse of power for one's own gain. Bribery means offering, giving, or receiving of a financial or other benefit for the purpose of influencing a decision, so that the decision would be taken on other but commercial grounds.

We have zero tolerance for corruption or bribery in any form.

### IN PRACTICE:

1. We will never accept or offer in connection with a business transaction any personal benefits, be they money or services.
2. We manage and ensure Posti's books, records and transactions accurately, honestly and on time.





## Gifts and hospitality

We do not accept, offer, or provide, in any circumstances, any unlawful financial or other benefits to authorities, customers, suppliers or other third parties.

We do not make, offer – or promise to offer – any payments or valuables to any third party with the purpose of getting a favourable business decision or action for Posti or another party.

All gifts and hospitality provided or accepted, by Posti employees need to comply with applicable laws and rules as well as Posti values and policies.



Always ask yourself: What would this look like through the eyes of an outsider?

For more information, see Approval Policy and Gift and Hospitality principles.

### IN PRACTICE: WE MAY OFFER AND ACCEPT MODERATE GIFTS AND HOSPITALITY IF THEY ARE:

1. lawful by nature
2. occasional to the same recipient or offeror – no appearance of bad faith or inappropriate behaviour should be created
3. appropriate to the situation
4. totally transparent in Posti decision making and accounting, and accepted by your supervisor
5. the value of a gift does not exceed the maximum of 100 EUR (for one person or entity at a time) or a lower local limit. Only upon the Compliance Officer's prior approval, a gift or hospitality exceeding this maximum value, may be offered, or received.

### HOWEVER, WE NEVER ACCEPT OR OFFER PERSONAL GIFTS OR HOSPITALITY FROM THE OTHER PARTY, WHETHER MONETARY OR IN FORM OF SERVICES, IN CONNECTION WITH A BUSINESS TRANSACTION:

1. in exchange for another benefit
2. for the purpose of improperly affecting a business decision
3. in connection with ongoing business negotiations or a pending offers

## Conflict of interest

In the working context, the interest of Posti should always come first before your personal interest or interest of a third party. Any actual or apparent conflicts of interest must be reported immediately, in advance, to your supervisor, the HR-department, Legal Affairs or Compliance.

The following situations must be considered as potential conflicts of interest:

- > secondary occupation, consulting project, co-ownership or ownership of the company that could affect your work or employment relationship with Posti
- > close relatives, close friendship
- > business relation with a competitor, customer or supplier or economic advantage related to a competitor, customer, or supplier

The following situations may also include a conflict of interest:

- > participation in a free trip or similar event of significant value by the supplier or customer
- > putting oneself in a situation where one has to give a counter-gift or a service to get something

Employees who have a personal relationship with each other such as cohabitation or marriage, parenting, or close friendship should not report to each other directly or indirectly.

## SECONDARY OCCUPATION:

If you would like to engage in a secondary occupation (besides the full-time job at Posti), conduct business in your own, co-owned or another company, or engage in management position of another company, You shall ask for a prior consent. Request for consent shall be made to my supervisor, and a consent shall be approved by your supervisor or her/his supervisor and HR together, and it shall

be recorded and archived (preferably in HR system).

Consent may be approved in case the secondary occupation if it does not interfere with the employee's responsibilities or it does not create a potential or apparent conflict of interest. Posti's working hours, tools or property may not be used for secondary occupation.

## IN PRACTICE:

1. we work for Posti. We do not work for, or assist, companies that compete with Posti
2. we do not engage in activities that compete with Posti
3. we immediately and in advance report any actual or apparent conflict of interest to our supervisor or HR function. When defining whether it is question of a conflict of interest, the decision shall be taken together by your supervisor (or her/his supervisor) and HR.
4. we immediately disclose, in advance, any transactions between Posti and a party with whom we have a personal relationship
5. there is a separate guidance and monitoring system issued by Audit Committee on possible transactions by Posti managers

# Cooperation With Third Parties

## Customers

One of the core goals of Posti is to succeed together with the customer. Our operations must be easy, fast, reliable, and responsible in every business situation. Customers' information is handled in a legal manner and we do not disclose customer information to external parties without a legitimate reason.

We treat all our customers with commitment, courtesy, openness, and respect. Excellent customer satisfaction is one of our most important business targets.



### IN PRACTICE:

1. We will not disclose any Posti's information to third parties or even internally, unless there is a legitimate need to do so, such as a contractual claim or a lawful request.
2. All interactions with our customers are always based on high compliance standards and professional, transparent, truthful, and accurate behaviour.
3. We respond to customers' complaints, and process them without any unnecessary delay and objectively, taking into consideration all applicable laws and regulations

## Suppliers

Posti treats its suppliers fairly. We ensure equal treatment of our suppliers and open competition.

Posti seeks reliable and honest business relationships with its suppliers, subcontractors, and other business partners. We focus our procurement activities on suppliers who can offer Posti competitive products and services. Strategic partners are selected for key sectors, enabling shared and collaborative product and service development.

In addition to economic and quality-related considerations, the sourcing criteria include environmental and corporate responsibility perspectives throughout the entire value chain.

Each Posti supplier shall comply with the Posti Supplier Code of Conduct. We expect our suppliers to commit to the same goals as Posti, i.e. to improve their operations actively and continuously in terms of the environment, social responsibility, and financial performance.



**IN PRACTICE:** We expect that all Posti's suppliers act in accordance with the following principles. The principles are defined in more detail in the supplier agreements and in Posti's Supplier Code of Conduct. The starting point is compliance with all applicable laws and regulations.

1. we do not accept bribes or illegal gifts or hospitality
2. we avoid conflicts of interest
3. we adhere to strict labour standards, including the health and safety of workers
4. we minimize the damage to the environment
5. we respect human rights, including equality and non-discrimination
6. we comply with Posti's security requirements



## Competitors

Posti supports fair business dealing with our customers and competitors in accordance with competition law.

All agreements, arrangement or measures that restrict competition and that could lead to a violation of competition law are prohibited in Posti.

### IN PRACTICE:

1. All contacts, discussions, or other actions in cooperation with competitors or competitors' representatives shall be implemented in a manner where the compliance with competition laws may be evidenced also afterwards. Consult Legal or Compliance in advance with a very low threshold.
2. All cooperation arrangements/agreements with competitors must always be consulted in advance with the Legal or Compliance.
3. Sharing of information, agreements or other arrangements with a competitor concerning prices, pricing policy, discounts, promotions, terms of sale, purchases, territorial markets, production cost or distribution are prohibited.



# Environment, Health And Safety

## Environment

**As a logistics company, our job is to transport things. Therefore, our operations also generate a lot of emissions. We are working on eliminating these emissions. We have set ourselves the ambitious goal of reducing our own emissions to zero by 2030. We are also committed to reducing other environmental impacts of our operations, such as value chain emissions and material efficiency and waste related impacts.**

Business groups and units are responsible for the environmental impact of their operations and their environmental projects. Each employee contributes to these efforts through their daily activities.



### IN PRACTICE:

1. We are aware of the environmental impact of our activities and strive to reduce it.
2. We comply with Posti's environmental rules and recommendations on, for instance, recycling, energy conservation and economical driving.

### OUR ENVIRONMENTAL MANAGEMENT IS BASED ON

- legal and regulatory requirements
- environmental management standards, in particular the ISO 14001 standard
- UN Global Compact principles and the Sustainable Development Goals (SDGs)
- International responsibility initiatives

Further information can be found in Posti's HSEQ, Health- and Safety, Environmental and Quality Policy and on Poster.





## Health and safety

We are committed to protecting the health and safety of every employee, and we want everyone to return home healthy at the end of each workday. We want our employees and partners to feel well.

To achieve this goal, we invest in proactive measures, comprehensive security procedures, clear responsibilities, effective security risk management, communication, and continuous process improvement. Our occupational health and safety performance is monitored regularly. We expect the same from all our partners.

### IN PRACTICE:

1. We, every Posti employee, follow the safety instructions and wear adequate protective equipment when we work at Posti or when we are at Posti's premises.
2. We take all possible measures to ensure health and safety at work of our staff, co-workers, and customers. Deviations are investigated and corrective actions are taken.
3. We report safety concerns to the appropriate employer representative or unit safety officer.
4. Working intoxicated or under the influence of drugs, as well as bringing them to work, is strictly prohibited and may result in termination of employment.

# Posti's Property And Information Security

## Posti's property

**Posti's funds and assets must be used in responsible manner, for legal purposes and only to promote Posti's business. The same principles apply to customer's property that has been handed over to Posti or kept or processed by us.**

Follow the Information Security Rules when handling intangible assets.

Report to your supervisor any non-compliance and possible damage to Posti's property.



### IN PRACTICE:

1. We always treat Posti's funds and assets responsibly, cost-consciously and prudently, and protect them from loss, damage, misuse, theft, abuse and destruction.
2. We use Posti's assets only for lawful purposes and for activities related to Posti's business.
3. We do not take any Posti's assets for our own use or make them available to others.
4. We protect confidential information
5. We protect and promote the reputation and positive image of the Posti brand.
6. When requesting an approval for an expense, benefit, and the use of Posti's assets, the information provided to the supervisor must be accurate and reliable.



## Information security

**Posti has a duty to secure the confidentiality, integrity, and availability of messages, other information and processing of information.**

In principle, all Posti's information is confidential. Particularly confidential, and in some cases secret, are for example, information on security arrangements, customers and their products, sales and sourcing contracts and information on shipments and their contents.

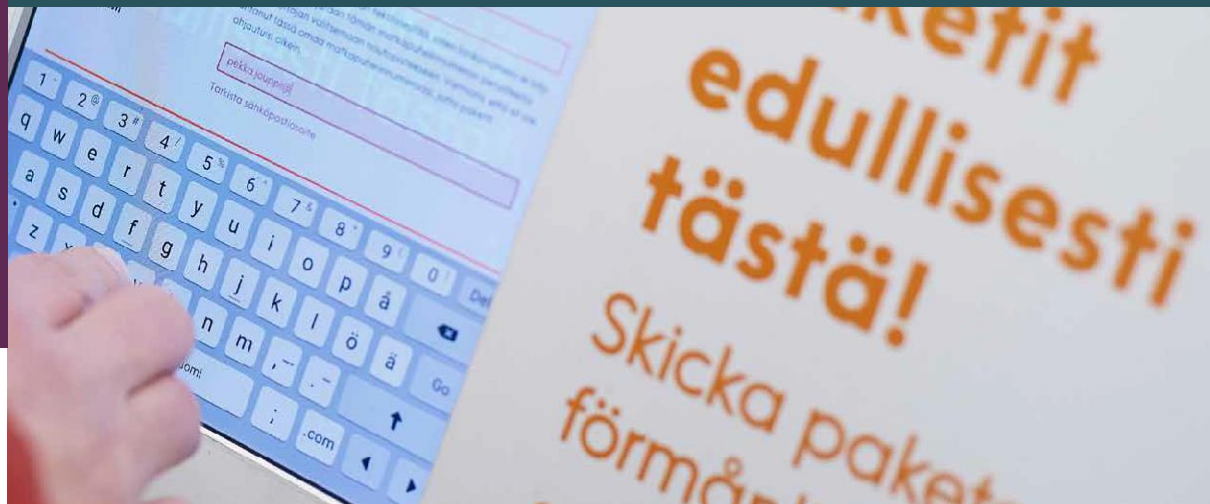
All employees must take care of the proper protection of Posti's assets. The information must be managed, used, disclosed, and shared in accordance with Posti's regulations.

For more information on the use of social media, see the Social Media instruction for Posti employees on Poster.

Any breaches or suspected breaches of information security must be reported to your supervisor or Posti ICT ServiceDesk phone: +358 20 451 4433  
email: [ictservice@posti.com](mailto:ictservice@posti.com), [IT Service Portal](#)

### IN PRACTICE:

1. We handle customer information only when it is necessary for the assignment.
2. We do not disclose information to third parties or even internally, unless there is a legitimate need to do so, such as a contractual claim or a legitimate request from an authority.
3. We use company tools for work-related tasks. Private use, if permitted, must not cause any harm or risk to company tools, systems or data.
4. For work, we use only company email, not other email address.
5. We handle access rights in an appropriate manner.
6. We do not use computers dedicated for production purposes for accessing the internet.
7. We do not install applications or other software on Posti's computers or other devices without special permission.
8. We adhere to good manners and act in accordance with the Posti's values on social media, and we never publish any confidential information directly or indirectly.



## Data Privacy

**The purpose of Data Protection is to protect all individuals – customers, their customers, employees, suppliers, and other stakeholders – against any violation of their privacy when processing personal data.**

Personal data is data relating to an identified or identifiable natural person. This includes information that enables identification directly or indirectly, for example by combining individual data with some other information.

Posti processes not only the personal data of its employees, but also information related to its customers and business partners. In order to comply with all laws and regulations and not to lose the trust of employees and external parties, the processing of all personal data must be appropriate, lawful and transparent in relation to those individuals. Personal data must be processed in accordance with the laws, regulations and Posti's guidelines.

More information in Posti's Data Protection policy and guidelines on Poster.

In case of a breach, report immediately to: [privacy.incident@posti.com](mailto:privacy.incident@posti.com). If you have any questions, send them to: [tietosuoja@posti.com](mailto:tietosuoja@posti.com).

### IN PRACTICE:

All personal data must be fairly and lawfully processed. This means:

1. data shall be collected, processed and stored only for pre-defined and reported purposes
2. data shall adequate, relevant and necessary for its purpose
3. data is accurate and up to date
4. data is retained only for the specified time, and kept only according to the defined retention time
5. data shall be processed in accordance with the rights of data subject's rights
6. data shall be protected by appropriate technical and organizational measures in accordance with the risk assessment.

# Consequences Of Misconduct

Posti adheres to zero tolerance for violations of the Code of Conduct. Failure to comply with this Code of Conduct or coercing another employee or a Posti supplier or business partner to violate this Code of Conduct will result in appropriate disciplinary actions, which may include dismissal and a claim for damages.

Certain illegal activities can also lead to criminal sanctions. Criminal activity, such as stealing or intentionally damaging a customer's property, serious violating data protection, or endangering the safety of other employees, or violence, will always result in termination of employment.

Each company within the Posti Group ensures that every employee is familiar with the current Code of Conduct and complies with it in all their activities.

## IN PRACTICE:

1. The consequences of misconduct may be a caution, warning, or the termination of employment, as well as liability for any damages attributable to the act in question.
2. In addition, certain unlawful acts may lead to criminal sanctions, such as fines or imprisonment. Posti will assess the illegality of the misconduct and report them to the proper authorities as needed.





# Reporting Alleged Misconduct

If you notice or suspect someone is breaking the law, this Code of Conduct or Posti's approved practices, policies, or guidelines, report your suspicions without delay. All suspected misconduct will be investigated properly, with utmost discreet and confidentiality.

We do not allow any form of retaliation against employee who reports a suspicion of misconduct in good faith. You do not have to know all the facts, just believe that the information you provide is true. However, it is not acceptable to knowingly make accusations, lie to investigators, or interfere with an investigation.

**IN PRACTICE:** You can report a suspected misconduct

- |                                                                                                          |                                                                                                                            |                                                                                                                        |
|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| 1. to your supervisor                                                                                    | Our subcontractors:                                                                                                        | 4. to internal audit                                                                                                   |
| 2. through anonymous communication channel                                                               | <a href="http://www.speakup-feedback.eu/web/postigroupexternals/fi">www.speakup-feedback.eu/web/postigroupexternals/fi</a> | Additionally, you can also send a letter to Posti Group Corporation, "Compliance", P.O. Box 105, 00011 POSTI, Finland. |
| Posti employees:                                                                                         |                                                                                                                            |                                                                                                                        |
| <a href="http://www.speakup-feedback.eu/web/postigroup/fi">www.speakup-feedback.eu/web/postigroup/fi</a> | 3. to compliance officer                                                                                                   |                                                                                                                        |

## HOW DO YOU KNOW IF YOU ARE DOING THE RIGHT THING?

In an ethically difficult or unclear situation, ask yourself:

If the answer to each of the questions is "yes", the act or decision is likely to be correct and in accordance with this Code of Conduct.

- > Is this act legal? Is this act ethically correct and honest?
- > Am I acting in the interest of Posti?
- > Is this act in accordance with our company's values, Code of Conduct and other Posti's Policies?
- > Am I ready to take the responsibility for this act?





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