



Matkahuolto's Ethical Code of Conduct for Partners

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Dear Partner,

By working together with our network of partners, for example in public transport, Matkahuolto's societal impact goes beyond its direct effects. Through our network, we are able to link actors to one another and enable a nationwide provision of services. Everything we do is governed by the relevant legislation, regulations and guidelines and by our ethical principles. Working with partners who share our values and bear their social responsibility is of paramount importance to us. We want to ensure good business practices throughout the supply chain and develop our operations in an increasingly responsible and ethical way together with our partners. In 2022, we compiled an ethical code of conduct for Matkahuolto employees and the following year we published a common code of conduct for our partners. The purpose of the Ethical

Code of Conduct is to help us all to act in an ethically sustainable way and to avoid practices that would be contrary to the laws that govern us, the commitments we have made or the conduct expected of us. As our network of partners plays a key role in our operations, we strive to build longterm, trustbased and mutually beneficial relationships with our partners. The Ethical Code of Conduct for Partners also provides guidelines for what to do if, despite everything, we discover activities that violate the Code. I strongly believe that when we work together in accordance with these ethical principles, our cooperation will become even stronger.

Mika Husso

CEO

Oy Matkahuolto Ab



Partnering with Matkahuolto

Matkahuolto strives to maintain an atmosphere of openness and ethically sustainable practices in its operations. In its Ethical Code of Conduct, Matkahuolto is committed to working only with partners and suppliers that comply with the law, respect human and labour rights and take into account the environmental impact of their operations. Matkahuolto requires its partners and suppliers to agree to comply with its ethical guidelines for suppliers and partners based on Matkahuolto's Ethical Code of Conduct.

This Ethical Code of Conduct for Partners ("**Code**") sets out the minimum standards that Matkahuolto's partners ("**Partners**") must follow in addition to the laws and regulations

governing their business. If the requirements of the Code differ from the laws and regulations applicable to the Partner's activities or from the Partner's own corresponding code of conduct, the Partner should comply with the requirements that are the most stringent. The Partner must ensure to an adequate extent that the Partner's own suppliers and subcontractors are committed to conducting their business in accordance with responsible practices that are, as a minimum, consistent with the essential parts of this Code.

The Partner must also, upon request, demonstrate its commitment and ability to comply with the requirements of this Code or its own equivalent ethical principles through appro-

priate management systems, policies and guidelines, training, resourcing, risk management and/or other appropriate means, taking into account the nature and scope of its business. This Code forms part of the agreement between Matkahuolto and the Partner, any breach thereof will be considered a material breach of agreement by the Partner. For some products or services, Matkahuolto may also have separate ethical or sustainability requirements in addition to this Code, compliance with which is subject to an agreement between the parties.

1. We are committed to responsible business practices

Always compete within legal limits

Comply with all applicable laws and regulations and binding decisions of the authorities. Strict and accurate compliance with the rules is a prerequisite for partnership with Matkahuolto. Compete fairly and in accordance with the competition laws in force at the time. Ensure that your staff are sufficiently skilled in competition law and understand the legal procedures.

Zero tolerance for corruption

Avoid situations where there may be a conflict of interest between the Partner and Matkahuolto, inform Matkahuolto immediately of such situations, and also try to avoid situations where decisions regarding your business would be made, due to a conflict of interest, in favour of a third party and not in line with your business interests.

Maintain zero tolerance for corruption and bribery in business and refuse to give, receive or pass on bribes, facilitation payments or kickbacks.

Avoid excessive business-related hospitality or business gifts that may inappropriately influence decisions related to your business.

Ensure privacy and security

Make sure that all processing of personal data is appropriate and careful and complies with legal requirements.

Keep sensitive information about Matkahuolto confidential and protect it in accordance with general good practices using adequate data protection mechanisms. Do not use information about Matkahuolto for purposes other than those agreed.

Make sure that your products and services are safe to use and meet the quality standards set for them.

Partnering with Matkahuolto

1. We are committed to responsible business practices

Examples

Cartels

It is against competition law to agree with competitors on the prices of products or services, on participation in tenders, or on arrangements whereby competitors will only operate in certain markets or with certain customers.

Compliance with the law

The Partner aims to offer services to Matkahuolto and its other customers at the lowest possible price by using the cheapest possible service providers. The Partner has reason to believe that one of its service providers will not be able to provide its services to the Partner at the agreed price without using illegal labour or otherwise acting unlaw-

fully. It is the Partner's responsibility to investigate the circumstances and ensure that the supply chain is not operating in violation of the law.

Hospitality and gifts

Matkahuolto is currently tendering for the services that the Partner is interested in offering to Matkahuolto. The current service provider knows the key person at Matkahuolto and that the person is involved in car sports. The service provider offers the key person the opportunity to go to the Jyväskylä World Rally Championship for the weekend at the service provider's expense.

The key person of Matkahuolto is obliged to refuse to attend the event. During tenders or substantial

commercial negotiations, no gifts or benefits may be accepted which would otherwise be permitted as reasonable and customary and which are not intended to influence decisionmaking. In this case, the benefit offered may not even be reasonable or customary and would easily appear to outsiders as an attempt to influence decision making to the detriment of the Partner and others.

Processing of personal data

The Partner acts as a subcontractor to Matkahuolto, which involves the processing of personal data of Matkahuolto's customers. The parties agree on changes to the service, which also result in changes to the needs for the processing of

personal data. Matkahuolto and the Partner must identify the possible need for changes in the processing of personal data in good time before implementing the service changes and the deletion of data that will become redundant as a result of the change.

Confidential information

Matkahuolto discloses confidential information to the Partner in order to provide the service. It is the responsibility of the Partner to ensure that its employees are bound by and respect the appropriate confidentiality obligations and that the information is used only for the agreed purpose.



2. We respect human rights

Responsibility for human rights extends throughout the supply chain

Respect universal human rights and support their realisation in your own activities and in your supply chain.

Ensure, through due diligence and appropriate procedures, that you or your supply chain are not complicit in human rights abuses and that you identify, prevent and remedy any negative impacts of your actions.

Intervene and take prompt corrective action if you observe human rights violations.

Example

Human rights

The Partner recruits labour from outside the EU using a local recruitment consultant. The Partner must ensure that the recruitment consultant is reputable and does not charge recruitment fees or other charges that could easily lead to conditions such as forced labour for the recruited persons.

The Partner must also ensure that employees coming to work in Finland have sufficient information about their rights. The Partner's staff must also be informed that they can, if necessary, report any irregularities they have detected to Matkahuolto's whistleblowing hotline.

For more information on human rights, see the Human Rights Centre's guide on the responsibility of businesses to respect human rights and the website of the UN Global Compact Finland.



3. We recognise the rights of employees

Employee rights

Do not employ children under the age of 15 (or below the minimum legal age, if higher) and ensure that the employment of young people under the age of 18 does not jeopardise their education, health, safety or psychological development. If child labour were to be detected, a solution must be found in the best interests of the child.

Ensure that all work is voluntary, that no debt-bonded or other forced labour is used or profited from, and that employees are not required to leave identification documents or money with the employer or charged recruitment fees.

Recognise the right of employees to organise, to form a union, to belong (or not) to a union and to bargain collectively.

We comply with legislation and collective agreements

Put employment contracts in writing and ensure that employees have the opportunity to terminate their contracts after a reasonable period of notice in accordance with national law or the employment contract.

Provide all workers with at least 24 hours of uninterrupted rest over a seven-day period and, in the absence of applicable laws and collective agreements, ensure that regular working hours do not exceed 48 hours per week (or 60 hours including overtime).

Pay your employees at least the reasonable minimum wage in accordance with national law or the applicable collective agreement, in addition to overtime pay.



3. We recognise the rights of employees

Examples

Safeguarding employees' rights

The Partner provides transport services and there is a labour shortage in the sector. The relative share of immigrants in the sector's workforce is growing significantly. Many of the recruits do not speak Finnish or English as their mother tongue and their knowledge of Finnish labour law and workers' rights is limited.

The Partner must ensure that even those with limited Finnish language skills or knowledge of Finnish labour law receive adequate basic information about their rights and, for example, their right to organise freely. For example, the Partner could agree with the employee

representative on measures to familiarise people from a migrant background with the basic principles of labour law, and direct them to seek further information from public services, such as the Finnish Institute of Occupational Health guidelines in 13 different languages.

Overtime

The Partner's business is developing and growing strongly. The increasing number of customers and the requirements of new ones mean more work for the Partner's staff. The Partner's management is increasingly receiving signals from the organisation that overtime is becoming a permanent practice rather than a temporary condition.

The number of sick leaves related to work-related fatigue is also on the rise.

The Partner must take measures to remedy the situation and bring the workload of the staff to a level that they can manage within the working hours and overtime in accordance with the law, collective agreements and employment contracts, and taking into account the well-being of the staff. Measures should be mapped out in consultation with staff or their representatives and, where possible, in cooperation with occupational health.



4. We take care of our employees

A safe and non-discriminatory working environment is an employee's right

Treat all employees fairly and equally regardless of ethnic origin, religion, gender, political opinion, age, nationality, sexual orientation, disability or any other characteristic not related to a person's qualifications or the inherent requirements of the job. No physical, psychological, verbal or sexual harassment, bullying or abuse of employees should be tolerated.

Provide employees with a safe and healthy working environment where injuries and health

risks are prevented and appropriate training is provided on how to avoid health risks that may be present in the workplace, as well as fire safety, hazardous working practices and first aid. In addition, take the necessary measures to prevent hazards and accidents, such as appropriate protective procedures, work practices, emergency plans and protective equipment.



4. We take care of our employees

Examples

Discrimination, harassment and bullying

The Partner conducts an anonymous job satisfaction survey, which reveals that discrimination, harassment and/or bullying occur in some of the Partner's locations. The Partner investigates the matter and finds that there has been at least some behaviour on the premises that some have found offensive and embarrassing, even if it was not intended as such. The Partner's management considers it necessary to address the issue and reminds the staff of the zero tolerance policy on harassment, discrimination and bullying and instructs immediate supervisors to closely monitor the situation.

Ensuring safety at work

In addition to its own staff, the Partner uses hired labour at its locations. There is a high turnover of agency workers. Due to the safety regulations related to the performance of the work and the operation of the business, the Partner and the agency agree on a procedure to ensure that the agency workers employed at the Partner's premises have received the safety training required by the Partner and are aware of the Partner's safety guidelines.



5. We look after our environment

We monitor and reduce negative environmental impacts

Identify, monitor, reduce and report to Matkahuolto, if requested, negative environmental impacts from your own operations and value chain, such as greenhouse gas emissions, waste or energy use. Promote and develop business models, practices and procedures that are in line with the circular economy.

Comply with agreements with Matkahuolto and related Matkahuolto guidelines on providing environmentally friendly services, and meeting and/or reporting on environmental sustainability criteria, if applicable.

Example

Addressing environmental impacts

The Partner is active in the transport sector and is in the process of investing in transport equipment. The Partner must take environmental considerations into account as part of its overall assessment when choosing transport equipment.

Among other things, Matkahuolto encourages the Partner

- to calculate the climate emissions caused by the Partner's activities, set a target for reducing them, identify emission reduction measures and monitor and report on its progress
- to explore the possibilities of different circular economy solutions to reduce waste
- to improve the energy efficiency of the Partner's operations with solutions suitable for the Partner and by encouraging the Partner's own subcontractors to reduce the environmental impact of their operations.



Monitoring

The Partner must, upon request by Matkahuolto or a third party designated by Matkahuolto, disclose information related to compliance with this Code and, if necessary, arrange for an audit of the Partner's operations at a time that does not unduly interfere with the Partner's business or prevent the Partner from fulfilling its legal or contractual obligations.

If Matkahuolto finds that the Partner does not comply with this Code, it will notify the Partner of the issues that require correction or improvement. The Partner must take corrective action without delay and provide adequate

evidence of its implementation. However, Matkahuolto reserves the right to cancel the products or services ordered, suspend the delivery of products or services and/or terminate the main contract with the Partner if the Partner has materially breached this Code or refused to take adequate corrective action without undue delay.

How to report abuses and concerns?

If the Partner or its employee discovers or suspects that someone is violating the law or this Code (or, in the case of Matkahuolto's own personnel, Matkahuolto's Ethical Code of Conduct) in connection with the cooperation between the Partner and Matkahuolto, Matkahuolto requests the Partner to report the suspicion without undue delay to its contact person at Matkahuolto or in confidence at <https://report.whistleb.com/fi/matkahuolto-ext>.





The Better Way