

# Supplier Code of Conduct

**At Posti Group Oyj (Posti) all our operations are based on responsible and ethical ways of working, and we carry out our business with integrity and in line with ethical standards expressed in our Code of Conduct, which also form the framework of this Supplier Code of Conduct. All suppliers, subcontractors, and other business partners shall commit to this Supplier Code of Conduct in their co-operation with Posti and in business interactions with their own employees, suppliers and other stakeholders.**

## Background and purpose

Tomorrow's Posti is a modern delivery and fulfillment company with progressive profitability. The purpose of our existence sums up both our professional pride stemming from hundreds of years of experience and our constant desire to stay ahead of our time: Responsibly delivering what matters to you – on your terms.

Posti is a reliable and open bearer of sustainability, and we realize our responsibility towards society, environment, and all our stakeholder groups. The principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the UN Sustainable Development Goals (SDGs) have been taken into account in the alignment of Posti's corporate responsibility. The UN Global Compact contains principles on human and labor rights, environment, and anti-corruption. The UN Guiding Principles on Business and Human Rights out-

line the corporate responsibility to respect human rights. The UN Sustainable Development Goals include principles to secure sustainable development.

We require the suppliers and other partners of Posti Group and its companies and their subcontractors ("the Supplier") to comply with the above-mentioned principles which have been taken into account in the alignment of Posti Group's corporate responsibility.

This Supplier Code of Conduct is owned by Posti's Sourcing unit and is approved by Posti Group's CEO on 12.1.2022. Posti has had a Supplier Code of Conduct since the beginning of the 21st century and the target audience is Posti's suppliers, subcontractors and other business partners. The document is reviewed annually by Posti's Sourcing unit and Sustainability unit. If you have any questions, please do not hesitate to contact Posti Sourcing unit.



## Compliance with laws and regulations

The Suppliers shall comply with all applicable laws and regulations to their operations as well as governmental guidelines and instructions in effect in the countries and regions where they conduct business. If local customs or regulations depart from this Supplier Code of Conduct, the stricter of these shall be complied with. Posti do not accept any non-compliance, and we never urge or instruct anyone to break law or regulations.

### Ethical Business practice

The Suppliers shall comply with responsible business practices in all their activities and conduct their business in a fair and ethically sustainable manner and with absolute integrity. In addition to complying with the laws and regulations in effect, the Suppliers are expected to act in accordance with good business principles. The Suppliers shall commit to not employing illegal, irregular or unethical commercial practices or procedures.

### Zero tolerance for corruption and bribery

Posti requires the Suppliers to have zero tolerance for corruption or bribery in any form. Posti expects that the Suppliers have standards and procedures in place to ensure that their employees or any third parties acting on their behalf do not offer, promise, give or accept any bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any other improper advantage. Bribes may not be paid, or any other unlawful financial benefits given to any authorities, customers, or other parties under any circumstances. In particular, it is prohibited to give or receive bribes, gifts or services that exceed normal and conventional hospitality.

### Conflict of interest

The Supplier shall avoid any situations where a conflict of interest between the Supplier and Posti may or can exist. The Supplier shall disclose to Posti all potential or existing conflicts of interest situations in its engagement with Posti.

## Data protection and information security

In principle, all Posti's information is confidential. The Suppliers shall adhere to applicable data protection laws, including security of personal data, as well as to respective. In order to comply with all laws and regulations and not to lose the trust, 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.

### Fair competition

Posti supports fair business dealing with its customers and competitors in accordance with competition law. The Suppliers shall compete in a fair manner in compliance with all applicable antitrust laws and regulations and shall have standards and procedures in place to ensure that their employees do not engage in any anti-competitive practices.

## Human and labor Rights

In all their operations, the Suppliers are expected to promote and respect internationally recognized human rights, including those set out in the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Suppliers shall make sure that they are not engaged in violation of human rights and interfere in all negative human rights effects of their actions.

### Diversity and Inclusion

Posti requires the Suppliers to treat all their employees fairly and equally, regardless of race, religion, gender, political opinion, age, nationality, sexual orientation, civil status, disability, or any other characteristic that does not relate to the individual's qualifications or the inherent requirements for the work. The Suppliers shall treat their employees with dignity and respect and not tolerate any type of harassment of their employees whether direct



or indirect, physical, or verbal. Equal pay for work of equal value shall be promoted in all positions. Wages and benefits must, at the very least, meet the statutory minimum requirements.

### **Child and Forced labor**

It is prohibited for the Suppliers, under any condition, to employ children who are below the minimum legal age for employment. If this legal age has not been determined, the minimum age is the age of completion of statutory schooling. Children over minimum age cannot be employed for any hazardous work or work that could be harmful to the child's personal development.

The Suppliers shall in no circumstances use any form of forced, bonded or compulsory labor in their business operations or contract with subcontractors or suppliers using child labor or forced labor. Mental and physical coercion, slavery, punishment, and any other form of human trafficking are prohibited. Employees shall be free to leave their employment after reasonable notice as required by national law or contract. All labor must be voluntary, and employees may not be required to lodge deposits of money or identity papers with their employer.

### **Freedom of association and collective bargaining**

The Suppliers shall recognize and respect their employees' freedom of association and their right to freely choose their representatives. The Suppliers shall also recognize employees' right to collective bargaining.

### **Employment conditions**

The Suppliers shall ensure that their employees understand their employment conditions. Pay and employment conditions are fair and reasonable and comply at a minimum with the national legislation or industry standards, whichever are higher. Working hours are agreed upon in compliance with the national legislation. Employees must have at least one day off each seven-day week.

Unauthorized subcontracting poses a risk to compliance with this Supplier Code of Conduct. The Suppliers shall inform Posti about the use of subcontractors in advance.

## **Health and Safety**

The Suppliers shall provide their employees with a safe and healthy working environment in compliance with all laws and regulations. Appropriate health and safety information, training and equipment shall be provided to the Suppliers' employees. The Suppliers shall also comply with any safety requirements agreed in any contract documents. At a minimum, The Suppliers shall at least provide their employees with drinking water, clean toilet facilities, adequate ventilation, emergency exits, proper lighting and access to first aid supplies or other provisions for emergency care.

## **Alcohol and drug use at work**

Posti is an alcohol- and drug-free workplace. The Suppliers shall have a policy or guidelines in order to take precautionary action regarding alcohol and drug abuse. Suppliers' employees may not work at Posti's sites under the influence of alcohol or drugs. Occasional drug tests can be performed on Suppliers' employees when they are working at Posti's sites if it is allowed in national (or local) legislation.

## **Environmental responsibility and climate impact**

Environmental responsibility translates into an awareness and reduction of the environmental and climate impact of one's own activities. The Suppliers shall demonstrate initiative in promoting environmental responsibility.

Posti is committed to reducing the environmental impact of its operations and has set ambitious, science-based climate targets that include value chain emissions in addition to its own emissions. Posti's target is to have 100% fossil-free road transportations, including the value chain, by 2030. Suppliers play a key role in the promotion of this commitment.

The minimum requirement is that The Suppliers shall comply with the environmental laws and regulations in force in each of their countries of operation. The Suppliers shall monitor, control, minimize



and appropriately treat emissions and pollutants and other waste generated from their operations. In order to enable the Suppliers to respond to these requirements, Posti encourages the Suppliers to develop their own environmental management systems and consider the climate impact of their operations and implement greenhouse gas emissions reduction measures.

### Monitoring and Reporting

Posti requires that the Supplier shall regularly monitor its compliance with Posti's Supplier Code of Conduct. Posti conducts systematic supplier

assessments and audits to ensure the compliance of this Supplier Code of Conduct. If a Supplier acts in violation of these guidelines, laws, or principles, Posti has the right to terminate the contractual relationship with the Supplier and stop all co-operation.

If the Supplier or its employees notice or suspect someone is breaking the law, this Supplier Code of Conduct or Posti's approved practices, policies, or guidelines, Posti encourages the Supplier representative to report on the suspicions without delay to Posti's Sourcing Unit. Posti's Suppliers may also report suspected violations with utmost discreet and confidentiality by using [Posti's SpeakUp channel](#).

