



HRX Group Code of Conduct

1. Introduction

HRX Group is recognized for both our operational capabilities and our commitment to ethical conduct and integrity. In a constantly changing global environment, where we engage with diverse cultures, economies, and legal systems, a solid ethical foundation is necessary. That's why we've developed our Code of Conduct.

This document serves as the basis for our ethical guidelines, ensuring our actions align with standards of honesty, fairness, and respect. It addresses the challenges of our industry, providing clear guidance to foster an environment of trust and mutual respect. This Code reflects the principles that define us: integrity, accountability, and respect for all.

This Code applies to everyone within our organization, from top leadership to new recruits, as well as our contractors and partners. It represents our collective commitment to ethical business practices and legal compliance, helping us maintain the trust of our clients, partners, and the communities we serve.

2. Compliance with Laws and Regulations

At HRX Group, we understand the importance of complying with the legal requirements in every region where we operate. This is not just about following the rules; it's about staying engaged with the evolving legal landscape to ensure that our practices are up-to-date and adaptable.

We cover a broad range of areas important to our operations, including transportation and logistics regulations, labor laws, anti-corruption measures, and data protection like GDPR in the EU.

We've established working processes to ensure compliance at all levels, including the adoption of best practices and continuous oversight. Our Directors and Team Leaders stay informed about new laws and adjust our procedures as needed.

Our culture of transparency and accountability encourages open communication and provides secure channels for reporting concerns. This approach not only reduces legal risks but also reinforces HRX Group's reputation as a reliable partner in the logistics industry.



3. Ethical Business Practices

3.1 Integrity and Honesty

At HRX Group, integrity and honesty are the basis of our operations. These principles guide every interaction and decision, both within the company and with external partners. We strictly prohibit any form of fraud or unfair practices.

We don't only follow laws and regulations; we conduct business in a way that is fair and respectful to everyone involved. Transparency is key, and all employees are expected to act truthfully and ethically.

We ensure clear communication, transparent business practices, and fair dealings. We honor our commitments, understanding that honesty fosters long-term relationships based on trust.

We ensure everyone understands these values and their application in daily business through regular communication. We also maintain an open-door approach for reporting ethical concerns without fear of retaliation. Violations are addressed with appropriate actions, reinforcing our commitment to high ethical standards.

3.2 Conflicts of Interest

At HRX Group, we recognize that conflicts of interest can undermine our decision-making and damage trust. Employees must avoid situations where their personal interests might conflict with the best interests of HRX Group, its clients, or stakeholders.

Conflicts can arise from personal relationships, financial investments, or other situations where impartiality might be compromised. Employees are expected to identify and avoid these conflicts and report them to management if they occur.

When a conflict is reported, we handle it with discretion and take appropriate action to protect the integrity of our processes. Prevention is key, and we offer clear support to help employees handle these situations.

By managing conflicts of interest effectively, HRX Group maintains its commitment to ethical practices and strengthens trust with clients and partners.



3.3 Anti-Corruption

HRX Group is committed to ethical business practices and firmly opposes corruption. Our stance against corruption includes prohibiting bribes, kickbacks, and any other corrupt practices that could harm our operations or reputation.

We know corruption has serious consequences, and our fight against it isn't just about following the law. It reflects our core values.

Our approach includes careful due diligence, regular communication, and a commitment to transparency. We conduct checks, when necessary, to ensure our partners share our commitment to ethical practices, and employees are informed about relevant laws and regulations.

HRX Group gives employees the authority and support to stand against corruption. We also expect our network of vendors and subcontractors to adhere to our standards.

When corruption is detected, we investigate thoroughly and take corrective action. These measures show our commitment to continuous improvement and ethical clarity in the logistics industry.

4. Respect in the Workplace

4.1 Diversity and Inclusion

At HRX Group, we believe diversity and inclusion are important to our success. We focus on creating a workplace where everyone, regardless of background or beliefs, is valued and respected. Our actions and practices are designed to ensure fairness and respect for all.

Discrimination, harassment, and abuse are not tolerated and go against our corporate culture. By embracing diversity and fostering inclusion, we create a stronger, more cohesive team that is better equipped to achieve our goals.



4.2 Health and Safety

The health, safety, and well-being of our employees are important at HRX Group. We are committed to creating a work environment that meets safety standards and promotes health.

Our strategy includes complying with safety laws and regulations, as well as adopting best practices that align with industry standards. Safety is ingrained in our daily operations, and we support employees to contribute to a safer workplace.

We focus on continuous awareness initiatives to provide our team with the knowledge to manage risks. We also promote open communication about safety concerns and actively involve employees in creating safety measures, including organizing sessions dedicated to safety topics.

HRX Group provides comprehensive health insurance and supports mental and emotional well-being, recognizing the importance of overall health and safety.

5. Confidentiality and Data Protection

5.1 Confidential Information

At HRX Group, protecting confidential information is important to maintaining trust with our clients and partners. Every employee is responsible for safeguarding this data, which includes internal and external information.

We implement data protection measures and ensure that access is limited to authorized personnel. Confidentiality clauses are also included in contracts with external partners.

By following these practices, HRX Group maintains the integrity of our client relationships and protects our competitive edge.



5.2 Data Protection

HRX Group is committed to data protection, aligning our practices with GDPR to ensure privacy and security. We prioritize safeguarding personal data and ensure all processing activities are conducted with care.

We have developed a GDPR framework that outlines our data protection strategies, intended for use within the organization. This straightforward approach builds trust in our commitment to data security.

6. Environmental Responsibility

We integrate environmental considerations into our decision-making at every level, meeting and surpassing basic compliance requirements.

We have achieved ISO 14001 certification, reflecting our structured approach to managing environmental responsibilities. Regular audits help us identify areas for improvement and track our progress toward environmental goals.

HRX Group also adopts technologies and practices that contribute to sustainability, such as fuel-efficient vehicles and renewable energy sources. To achieve our goal of becoming a carbon-free transport company by 2035, we calculate our annual greenhouse gas emissions and adjust our strategies accordingly.

By embedding environmental responsibility into our operations, HRX Group aims to minimize our impact and inspire positive change in the industry.

7. Reporting Violations

HRX Group values integrity and accountability, encouraging employees to report any breaches of our Code of Conduct or unethical behavior. We protect whistleblowers from retaliation and ensure reports are handled with care.

We commit to conducting thorough investigations and taking appropriate action. HRX Group fosters a culture where speaking up is valued and protected.



8. Prohibition of Child Labor

HRX Group is committed to the ethical treatment of all individuals within our operations and supply chains. We do not permit the use of child labor in any form. This approach aligns with our values of respect, integrity, and responsibility.

We comply with all relevant laws and international standards regarding the minimum age for employment, ensuring that no individual under the legal working age is employed by HRX Group or any of our partners, subcontractors, or suppliers. We require the same level of compliance from all entities we work with.

If child labor is identified, HRX Group will take immediate corrective action, which may include ending contracts with any partners or suppliers found in violation. We will work with the appropriate authorities to address the situation and ensure that affected individuals receive the necessary support.

Our stance against child labor is clear and reflects our commitment to ethical business practices and the protection of human rights.

9. Enforcement and Sanctions

Adherence to our Code of Conduct is crucial at HRX Group. Breaches are met with appropriate actions, ranging from warnings to termination, depending on the severity. We ensure transparency in our investigations and maintain confidentiality throughout the process.

This enforcement demonstrates our commitment to ethical standards and reinforces accountability at HRX Group.



10. Policy Review and Updates

HRX Group recognizes the need for a Code of Conduct that reflects current laws and ethical standards while anticipating future challenges. We regularly review and update our Code to ensure it remains relevant and effective.

This process is inclusive, involving leadership and employees, and ensures that any updates are thoroughly evaluated and communicated across the organization. Our approach to policy review reinforces our commitment to ethical conduct and continuous improvement.

Pekka Mykkänen

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