

2017



EEZERY

Crowdsourced Logistic Cloud



CODE OF CONDUCT

3.12.2017



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Crowdsourced Logistic Cloud

Introduction

Purpose and business benefits

This Code of Conduct is applicable to all EEZERY's operations and to any party ("supplier") that contributes to EEZERY's services, products and other business activities. EEZERY requires suppliers and their subcontractors to comply with the principles set out in this Code of Conduct. EEZERY's business operations worldwide are based on high ethical standards. EEZERY promotes fair competition in accordance with applicable laws. Employees are expected to adhere to the principles of fair competition in the conduct of business.

Scope

This Policy is in accordance with United Nations Global Compact and the OECD Guidelines for Multinational Enterprises. This Policy applies to all EEZERY companies and employees in all countries of operation. Companies under EEZERY's control and their employees are also included in the scope of application. EEZERY will strive to promote this Policy with all parties contributing to EEZERY's services, products and other business activities.

EEZERY shall abide by the local laws and regulations of each country in which it operates. In situations where the law does not give guidance, EEZERY applies its own standards based on its corporate values and culture.

In cases of conflict between mandatory law and the principles contained in this Code of Conduct, the law shall prevail. It is the responsibility of all employees to be aware of relevant laws or to seek legal advice to ensure compliance.

Business practices

Safeguarding corporate assets Safeguarding EEZERY assets – both tangible and intangible (such as intellectual property rights) – is vital to EEZERY's business success. Employees have a duty to use EEZERY assets only for legitimate business purposes and to protect them from loss or unauthorized use. It is forbidden to use the company's assets for unlawful or improper purposes.

Conflict of interest

In order to operate in a fair and open manner, it is important that all employees and the members of the Boards of Directors avoid any situation or interest which might interfere with their judgement regarding their responsibilities to EEZERY's employees, customers, suppliers and other partners. Should such a conflict of interest arise, it must be reported immediately by the person subject to the conflict to his/her immediate superior.

Anti-corruption

No abuse of power, nepotism or bribery, including improper offers of payments to or from employees or organisations, shall be tolerated. Gifts or similar benefits may only be offered to, or accepted from, a third party if modest in value and if consistent with reasonable hospitality given in the ordinary course of business.

Political involvement

EEZERY does not take political stands and therefore the company does not give financial or other kind of support or assistance to individual politicians, candidates, political parties or institutions. Neither the EEZERY name, nor any resources controlled by EEZERY, shall be used to promote the interests of political parties or candidates.

Insider trading

EEZERY expects its employees to act in the way required of insiders, even if they are not officially registered as insiders. Employees must keep all information and secrets that relate to EEZERY's present and future business operations strictly confidential. It is prohibited to misuse or disclose to any third party any information about EEZERY's business operations or information about specific projects.

Accounting and reporting

All accounting and reporting by EEZERY must be conducted in accordance with generally accepted financial accounting practices, and accounting records must give a true and fair view of the financial position. EEZERY shall strive to provide disclosure that is open, fair, relevant, timely and understandable.

Human rights and workplace practice

EEZERY supports and respects the principles set out in the United Nations Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption.

Non-discrimination and equal opportunities

EEZERY hires and treats its employees in a manner that does not discriminate with regard to gender, nationality, religion, race, age, disability, sexual orientation, political opinion, union membership, or social or ethnic origin.

EEZERY promotes the idea that all employees shall be treated with equal respect and dignity. Furthermore, we promote a culture of equal opportunities and diversity where appointments to jobs, wages, benefits and personal success depend on individual ability and performance.

Fair labour conditions

EEZERY does not accept child labour nor other forms of compulsory or forced labour. EEZERY supports the freedom of association, and all employees have the right to be a member of a trade union and to bargain collectively. Fundamental human rights shall be known, understood and respected and applied equally to all employees whether temporarily or permanently hired, or contracted.

Physical abuse

Employees shall not be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.

Wages and benefits

Employees shall be paid fairly and at least the minimum total wage required by national applicable laws.

Health and safety

EEZERY provides all employees safe and healthy working conditions and environments. Adequate steps to prevent accidents and injury to health shall be taken by minimizing the causes of hazards inherent in the working environment and by providing appropriate safety equipment.

Environmental practice

EEZERY supports a precautionary approach to environmental challenges and a responsible way of conducting its own business operations. EEZERY's environmental rule shall be followed and respected by all employees.

Responsibility of managers and employees

It is the responsibility of EEZERY managers to make sure that both the content and the spirit of this document are communicated, understood and acted upon within their organisations and to encourage employees to report behaviour that may be non-compliant with this Code of Conduct. Explicit or implicit approval of questionable actions will not be tolerated. Reports of violations of this Code of Conduct may be made anonymously and in confidence to the General Counsel of EEZERY.

Persons reporting violations in good faith will not be subject to retaliation. Failure to act in compliance with the Code of Conduct can result in appropriate disciplinary actions.

Deviations

Deviations violating EEZERY's commitment to fair business practice, safe and equal workplace and precautionary approach to environmental protection will not be accepted.

Approving deviations or changes of purely technical nature are within the authority of the Policy Owner.

Requests for deviations and approvals shall be stored in an appropriate manner.

EEZERY enterprise Oy, 3.12.2017, CEO Marko Romppanen