

CODE OF CONDUCT

OUR BUSINESS

We are one of the leading companies in the Nordic region in the field of automotive logistics. Our company provides services and vehicle transport. Our customers are mainly car manufacturers and their general agents as well as retailers.

WHY DO WE NEED A CODE OF CONDUCT?

We want to create added value for our customers, employees, suppliers and owners. At the same time, we want to contribute to a sustainable society both nationally and internationally. In order to succeed, this requires that we and our partners act in a way that generates long-term trust and respect.

The Code of Conduct is an overall framework that provides guidance and advice on ethical issues and is complemented by detailed rules and guidelines for individual areas.

Axess Logistics is a member of the trade organisation ECG, European Car Group, which means that we comply with the ECG Code of Conduct and ECG Quality Manuals, and we expect our customers, partners and suppliers to comply with them, too, as appropriate.

WHO DOES THE CODE OF CONDUCT APPLY TO?

The Code of Conduct applies to:

- All Axess Logistics Group operations, from board and management to all employees, irrespective of their form of employment. The management and all executives should always set a good example with regards to ethical questions.
- All Axess Logistics business partners (customers, partners and suppliers). We expect our business partners to respect and comply with our Code of Conduct

OUR CORE VALUES

Competent – our broad technical knowledge and interest in what the automotive industry needs makes us best equipped to solve our customers' challenges

Effective – through continuous development of our IT systems and ongoing training of our employees, we create the conditions for smooth and effective total solutions

Solution-oriented – through close collaboration with our customers, we create solutions that simplify and improve the customer's everyday lives.

Innovative – we want to earn the title Lead Logistic Provider. We strive for this by creating a knowledgeable and curious employee culture that, together with our customers, helps develop the future's automotive logistics solutions.

From start to finish, our customers and business partners feel that we deliver these values in everything we do. Valuations, along with laws, rules and policies, form the basis of our Code of Conduct.

BUSINESS ETHICS AND BUSINESS PRINCIPLES

Marketing

Marketing and selling of our services should be characterised by openness and honesty and always comply with legal requirements and good marketing practices.

Bribery and corruption

We do not tolerate any form of corruption, bribery or extortion. This means, among other things, that:

- We act and make decisions without regard to personal gain for us or those related to us. We also do not use relationships with business partners for our own personal advantage.

- We avoid situations that can create or give the impression of creating conflicts of interest.
- If a conflict of interest can not be avoided, this should be reported openly to the line manager. If an employee is doing business outside Axess Logistics (so-called sideline job), this must be approved by Axess Logistics.
- We do not ever violate current law regarding any form of bribery. We do not give or receive gifts or services with a value that exceeds our established levels, and we do not participate in representation beyond normal business operations. We adapt to business partners' rules regarding gifts, representation, and more, should they be stricter than ours.
- We counteract economic crime in our industry. Economic crime distorts competition and leads to reduced social resources.

Confidentiality

If we receive information from our customers - about new models, volumes, etc. -, we will keep this information confidential, if requested by the customer. Information on gate codes, alarms and the like are always confidential. Likewise, information from our partners and suppliers should be treated confidentially if requested.

Rules on competition

We comply with current competition law in the markets in which we operate. This means, among other things, that:

- We do not accept any form of illegal anti-competitive measure, such as price collusion, cartel formation or abuse of market dominance.
- We do not commit ourselves to undue influence or manipulation that distorts competition.

Financial Responsibilities and accurate records

We accurately record, maintain, and report business transactions, including but not limited to financial accounts. Our submissions to the customers or regulatory authorities must be accurate and complete.

Export and import control and economic sanctions

We are engaged in business practices that comply with all laws and regulations regarding export and import control. All imports and exports must be declared correctly and transparently to the customs authorities.

Counterfeit parts

We have processes to detect and minimize the risk of introducing counterfeit parts and materials into delivered services. We require our suppliers to have effective processes to detect and minimize the risk of delivering counterfeit parts and materials to us.

Intellectual property

We protect and process intellectual property and fully respect the intellectual property of others.

HUMAN RIGHTS AND WORKING CONDITIONS

Equality and Diversity

Equality amongst everyone is a matter of course. Equality and diversity contribute to creativity and innovation, and they broaden our recruitment base, which enables us to achieve increased competence.

We do not accept any form of discrimination due to gender, ethnicity, religion or other beliefs, disability, sexual orientation or age. We act decidedly against possible violations and clearly distance ourselves from opinions that violate this principle.

Child Labour and Modern slavery

Axess Logistics and our supplier does not tolerate child labour or any forms of modern slavery or forced labour.

The minimum working age is the age of completion of compulsory school, but never less than 15 years. Young Employees shall not be exposed to work that is likely to harm their physical or mental health and safety.

Health and safety

Axess Logistics and our suppliers will provide a safe and secure work environment that meets or exceeds standards and legal requirements. We continuously work to improve the physical as well as the psychosocial work environment.

Responsible chemical management

Before we use chemicals in our activities, these must be risk assessed and approved. We give our employees easy access to safety data sheets for every chemical listed in Axess Logistics chemical system. We also work actively with substitution to replace harmful chemicals with less harmful ones.

Drugs and alcohol

Drugs and alcohol cause poor health and pose a major risk at work, which in turn leads to increased costs for both the company and society. It is therefore forbidden for all employees and business partners to stay at our workplaces or to do business on account of Axess Logistics's if they are under the influence of alcohol or drugs.

Freedom of association

We protect the right to freedom of association. Employees should be able to exercise these rights without getting hindered or risking harassment or reprisals.

Terms of employment

The terms of employment must always comply with current legislation. Signed collective agreements must be respected and adhered to. Hours should comply with national legislation.

Wages and Benefits

Axess Logistics shall always comply with applicable laws and collective bargaining agreements regarding wages and benefits. We also require our supplier to comply with applicable laws and collective bargaining agreements regarding this area.

CLIMATE AND ENVIRONMENT

To us, observing laws and environmental-related government requirements is a matter of course. Our environmental work is well integrated into our operations, and we continuously work to systematically prevent environmental risks and minimize our impact on the environment and climate. We focus on the areas in which our operations have the greatest climate and environmental impact, such as reducing emissions to the air from transport and facilities, and reducing water consumption and emissions of wastewater from our vehicle washing facilities.

Energy efficiency and renewable energy

We strive for efficient energy use in all our operations. We must support a transition to renewable energy sources where possible and use opportunities for energy exchange with the surrounding community where feasible. The work with energy efficiency should be seen as a continuous improvement process. All employees must be aware of and contribute to reduced energy use.

We as employees must know and take into account the negative effects our work tasks can have on climate and the environment. As far as possible, we must all strive to choose the options with the least negative impacts, e. g. when purchasing, choosing a company car or making a business trip.

We determine requirements for our suppliers

Our suppliers' impact on climate and the environment plays an important role in our climate and environmental work. When purchasing, this is an important aspect in the process of choosing a supplier. In agreements, we then clarify our requirements and guidelines for this area.

SOCIAL MEDIA

When using blogs and other social media such as Facebook, Instagram and Twitter:

- Keep in mind that the views you express in the blog / social media are your own and do not necessarily represent your company's or Axess Logistics views.
- Ask your line manager if you are unsure about what is appropriate to post.
- Show respect for the company, colleagues, customers, partners and competitors.
- Observe your duty of confidentiality vis-à-vis Axess Logistics regarding business issues, development, etc.
- Please note that it is forbidden to publish images with our customers' cars on public media. Please also note that there are also photography bans in ports, facilities and at our customers' premises.

APPLICATION AND COMPLIANCE

Managers at all levels are responsible for the compliance with the Code of Conduct, and they need to ensure that there are procedures in place that guarantee good internal control.

Managers should set a good example and be able to guide employees who are uncertain as to how the code should be applied in the daily work.

All employees have a responsibility to inform others if they suspect that the Code of Conduct is not complied with. First and foremost, their line manager. Should that not be appropriate, they should contact the Human Resources Department.

If an employee or business partner does not act in accordance with the Code of Conduct, an investigation of the matter will be made and measures will be taken. A business partner who fails to make sustainable improvements will seriously damage their relationship with Axess Logistics. Unwillingness to cooperate or repeated serious infringements of the Axess Logistics Code of Conduct and applicable laws may lead to reduced business contacts.

WHISTLE BLOWING

Axess Logistics strive to achieve transparency and to have a high level of business ethics. Our whistle blowing service offers an opportunity to confidentially make the organization aware of suspicions about irregularities. The service is an important tool to decrease the risks and to maintain the confidence in our organization by being able to identify and take actions against suspected irregularities at an early stage. Whistle blowing messages can be reported openly or anonymously. Communicate anonymously or confidentially through the reporting channel to the whistle blowing team: <https://report.whistleb.com/axesslogistics>.

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