

# **Code of Conduct**

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# **Ethical Guidelines**

Varova's ethical guidelines define the ethical principles that guide its employees and partners in their actions, practices, and behaviour, without exceptions. The guidelines do not replace personal judgment or provide answers to all ethical situations but help recognize such issues and respond correctly.

# Scope and Application

These ethics rules apply to all Varova employees and management. The company expects its partners and representatives to follow similar ethical and moral standards.

# Laws and Regulations

Obeying laws and regulations is the basis for all our business operations. Legal responsibilities depend on the mode of transportation and follow Finnish laws and international agreements like CMR.

As a member of the Finnish Freight Forwarding and Logistics Association, Varova adheres to industry standards (NSAB 2015, IATA, FIATA). Any uncertainties are resolved with supervisors and experts.

## **Business and Employees**

Varova follows Finnish laws on equality and diversity, actively supporting gender equality and fair working conditions. The company promotes employee development, training, and well-being while ensuring a safe workplace.

Varova does not tolerate discrimination based on nationality, age, beliefs, opinions, health, disabilities, or personal factors. Workplace harassment and sexual misconduct are strictly prohibited.

## Subcontractors and Partners

Varova ensures that subcontractors meet legal requirements and does not tolerate unethical business practices. Global partners must follow local laws, including bans on corruption and child labour.

# Corruption, Money laundering and Bribery

Varova strictly opposes corruption and does not allow cash payments. Expenses of business meetings and events shall be reasonable and are not expected to result in any reciprocal services or benefits. Management can help set appropriate limits.



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#### **Sanctions**

Varova follows all national and international sanctions, avoiding business with sanctioned individuals, organizations, or states. Compliance with sanctions is crucial, and all employees and partners must uphold these principles.

#### Procurement

All purchases adhere to company guidelines. Large purchases require management approval. Varova does not expect favours in return for business transactions.

# Data Security

Varova complies with all applicable laws and regulations regarding data security. As an Authorized Economic Operator (AEO), it maintains strict security measures. Confidential customer and Supply Chain information is restricted. Employees undergo security training and follow detailed procedures to protect sensitive data. IT providers must comply with privacy laws.

Our privacy statement explains what personal data we may collect from users of our services. We also describe the purposes for which we may possibly use this data. As the data controller, we require all IT service providers we use to maintain confidentiality, ensure appropriate data security, and commit to the principles set forth in personal data legislation.

## Workplace Safety

Varova ensures safety for all employees. Employees must report all safety concerns to their supervisors to prevent risks to health and well-being. We report all near misses and occupational accidents.

## Environment

We seek eco-friendly solutions, reducing emissions and optimizing resources. Employees work in rented office spaces, where landlords manage and control the property. Varova minimizes waste and paper use while encouraging energy efficiency. The company prefers electric vehicles.

## Whistleblower

Employees can report serious misconduct that violates company values and ethical guidelines through a confidential whistleblower system. This includes fraudulent, dishonest, unethical, or irresponsible behaviour that threatens the business.



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