

## **Niemi Palvelut Oy**

### **Principles of Corporate Responsibility**

## Contents

<b>1. PRINCIPLES OF RESPONSIBLE BUSINESS PRACTICE .....</b>	<b>3</b>
1.1 Compliance with laws.....	3
1.2 Responsible financial management .....	3
1.3 Promotion of competition.....	3
1.4 Conflicts of interest .....	3
1.5 Customer relationships .....	4
1.6 Relationships with subcontractors and other partners .....	4
1.7 Good working environment .....	4
1.8 Environmental responsibility.....	5
1.9 Implementation of the principles of responsible business practice .....	5
1.10 Updates .....	5
<b>2. ENVIRONMENTAL POLICY .....</b>	<b>6</b>
<b>3. HR PRINCIPLES.....</b>	<b>7</b>
<b>4. QUALITY POLICY .....</b>	<b>8</b>
<b>5. DATA PROTECTION POLICY.....</b>	<b>9</b>

## **1. PRINCIPLES OF RESPONSIBLE BUSINESS PRACTICE**

As a family business we want to grow and develop our business in the long run and in accordance with the principles of sustainable development. In order to be successful, we must do our work responsibly and take into consideration the expectations of our customers, personnel and other stakeholders.

Our operations are based on the “Niemi approach” – common values. We are a family business whose first priority is the customers and personnel. Environmental protection is also an important part of the “Niemi approach”. Our activities must be in line with our values and promises.

These principles of responsible business practice define the way Niemi Palvelut Oy’s employees and managers work. Everyone working for our company must follow these principles in their work. We will specify this general code of conduct, where necessary, with more detailed principles and guidelines.

Our principles are available for anyone to see on our website at [www.niemi.fi](http://www.niemi.fi).

### **1.1 Compliance with laws**

We fully comply with the applicable legislation and agreements when working in Finland and other countries.

We all must be aware of the laws, regulations and guidelines, particularly those relevant to our own work, and we must be committed to following them. From our perspective, the most important regulations are those concerning road traffic, working hours and employment contracts. Supervisors are responsible for the required orientation and supervision.

### **1.2 Responsible financial management**

We make sure that our finances are handled accurately and in accordance with the relevant regulations. We take care of the company’s property and do not use it for illegal purposes. We safeguard the confidentiality of our company’s own materials as well as other materials in our possession.

### **1.3 Promotion of competition**

We develop our industry’s general operating conditions and practices in industry associations together with other companies. We comply with the applicable competition legislation and we do not accept any kind of restrictions of competition.

### **1.4 Conflicts of interest**

Our personal interests may not conflict with the company’s interests.

We do not participate in business activities competing with our company or in the business activities of an organization engaged in a business relationship with our company and we do not pursue personal gain in business relationships.

We do not pay or accept bribes or other illegal payments.

We do not offer or accept any hospitality, gifts or benefits that could be deemed to influence decision-making in our business relationships or could be deemed to exceed the limits of reasonable hospitality.

Our company's donations, sponsoring activities and other stakeholder collaboration must be in line with our business principles and support the achievement of our objectives.

We comply with the FIDI Anti-Bribery and Anti-Corruption Charter (FIDI ABC Charter).

### **1.5 Customer relationships**

Our success is based on satisfied customers and long-term customer relationships. Surveys show that for a long time customers have considered us to be the best company in our industry. Our aim is to maintain this position and strengthen it further. Therefore it is of utmost importance that our actions are in line with our promises.

We monitor customer satisfaction through regular surveys and our customer feedback system and use the information to constantly develop our services.

### **1.6 Relationships with subcontractors and other partners**

We need subcontractors and other partners in our work. Collaboration is most likely to be productive for both, us and our partners, when our interaction is open, we trust each other and adhere to our agreements.

We expect our partners to comply with laws and regulations. Also our partners' practices, reliability, quality, prices and supply capacity must meet our company's requirements. Personal reasons may not influence our choice of partners.

We introduce our principles to our partners and promote the application thereof in our mutual collaboration.

### **1.7 Good working environment**

We want to offer a good, encouraging and safe working environment. Our supervisors must promote a leadership culture that is in line with our values and these principles. We encourage our personnel to take part in the development of our workplace community, for example through initiatives and by answering surveys.

When developing our workplace community, we pay particular attention to occupational well-being and occupational safety. We aim at a high quality level in everything we do to ensure the satisfaction of our customers as well as cost-effectiveness.

We treat all our current and potential employees equally with regard to our work and recruitment principles and practices. We are committed to equal treatment in all employment relationships and we do not tolerate any kind of discrimination, harassment or bullying.

We participate in labour market organizations' activities and respect our employees' freedom of association and right to collective bargaining.

### **1.8 Environmental responsibility**

We want to lead the way within our industry with our environmental measures. Each one of us is responsible for the state of our environment. Even though our environmental impact is low in comparison to large companies, we have an obligation and an opportunity to constantly reduce our environmental burden and promote sustainable development within our industry. We take environmental aspects into consideration in our decisions and practical work and use our environmental expertise as a competitive advantage.

Our environmental aims and objectives have been recorded in our company's environmental policy. We develop our environmental management systems as well as our environmental practices and indicators based on the principles of continuous improvement.

Our personnel are offered the required training and guidance on environmental matters. We communicate our objectives, practices and results openly to our stakeholders and expect our partners to support the achievement of our objectives through their own actions.

### **1.9 Implementation of the principles of responsible business practice**

Supervisors are responsible for familiarizing current and new employees with the principles. The company's management monitors the implementation of the principles. The personnel should always contact their supervisor, management or another person familiar with the situation if there is uncertainty regarding the principles and complying with them.

A violation of the principles should always be reported to one's supervisor. Immediate supervisors and the management, where necessary, are responsible for investigating all violations and deciding on the possible further measures. Those reporting violations will not face negative consequences.

Practices that are in breach of the principles must be corrected without delay. Severe violations lead to disciplinary measures and even to the termination of employment.

### **1.10 Updates**

Niemi Palvelut Oy's Board of Directors has adopted these principles of responsible business practice on 11 May 2016. The principles are reviewed once a year by the management to make sure that they are in line with the applicable regulations and the company's objectives.

## **2. ENVIRONMENTAL POLICY**

As the market leader we want to be a pioneer in environmental protection and lead the way for other companies within our industry. We monitor the main environmental impacts of our work carefully, provide training to our personnel and develop our practices based on the principles of continuous improvement to minimize the burden on the environment.

Our environmental aims and objectives:

- We measure the main environmental impacts of our activities (energy consumption, emissions, waste etc.), report on the results of our environmental work and set new demanding objectives each year.
- We ensure that our transportation vehicles are as new as possible and utilize the possibilities of new technology to reduce fuel consumption and emissions.
- We service our transportation vehicles regularly to minimize fuel consumption and emissions.
- We plan our transportation activities so that our customers' loads can also be combined to reduce the environmental impacts and customers save in costs due to the reduced transportation distances.
- We maintain and develop the properties we use to reduce energy and water consumption.
- When recycling our customers' items, we comply with the order of priority prescribed by the Waste Act and thus our primary aim is to reduce the quantity and harmfulness of waste generated. The aim of the recycling system we have developed is primarily to utilize all materials through reuse and secondarily as energy. Our aim is to produce no landfill waste.
- We encourage our customers to use recyclable packing materials.
- We train our personnel to know our environmental impacts and to do their share to reduce them in their work.
- We train our subcontractors to support our environmental aims and objectives.

By doing the above we can show that we know our environmental impacts precisely and we make an effort to reduce them in order to serve our customers as responsibly and cost-effectively as possible.

This environmental policy has been adopted by Niemi Palvelut Oy's Board of Directors on 11 May 2016 and will be reviewed once a year by the management.

### **3. HR PRINCIPLES**

Our HR management is based on our company's values and the principles of good business practice. Our success as a service company depends strongly on our employees' motivation, job satisfaction, competence and service-minded attitude. We invest in the continuous development of these factors through our management. We measure our results and set new demanding objectives every year. Everyone working for our company is responsible for promoting a good workplace community.

Our HR principles and objectives:

- We fully comply with all laws and agreements related to our HR functions. Our personnel have freedom of association.
- We respect all employees' human dignity and right to privacy.
- Our workplace community is equal and we do not tolerate any kind of discrimination. We do not tolerate any threats or harassment targeted at our employees.
- We invest in occupational safety and well-being.
- Together with the occupational health care representatives, we conduct workplace reviews and improve work ergonomics, occupational well-being as well as balancing work, family life and other free time.
- We monitor our employees' job satisfaction and occupational well-being through annual surveys.
- We carry out annual performance review discussions with all employees.
- We offer our employees an opportunity to undergo training and advance their career within our company.
- Our pay system encourages independent development and high-quality leadership.

By doing the above we ensure the constant positive development of our workplace community and customer satisfaction and safeguard our company's future and jobs.

These HR principles have been adopted by Niemi Palvelut Oy's Board of Directors on 11 May 2016 and will be reviewed once a year by the management.

#### **4. QUALITY POLICY**

Niemi is a family business whose first priority is the customers and personnel. Our operations have always been based on satisfied customers. Everyone working for our company must understand the importance of customer service and be committed to doing their work in a professional and service-oriented manner and in accordance with our company culture.

Our aim is to be a very high-quality service industry company. Therefore, we are constantly developing our services, operations, expertise, working conditions, equipment and company culture. Satisfied, competent, hard-working, reliable and service-oriented personnel provide the highest level of customer service.

Our quality principles and objectives:

- We provide the highest quality of service for our customers within our industry.
- We ensure our customers' satisfaction with the quality of service through constant customer satisfaction surveys. The survey results are utilized in service development and personnel training.
- Our aim is always to establish long-term customer relationships that are based on mutual trust.
- We handle deviations in terms of service quality fairly and without delay. The lessons learned from deviations are utilized to develop service quality.
- We work systematically in accordance with the agreed processes and guidelines.
- We ensure our personnel's competence by offering training at all levels.

By doing the above we ensure the constant positive development of customer satisfaction and safeguard our company's future and jobs.

This quality policy has been adopted by Niemi Palvelut Oy's Board of Directors on 11 May 2016 and will be reviewed once a year by the management.

## **5. DATA PROTECTION POLICY**

We at Niemi believe that the services we offer put us in a position of trust. Therefore, we pay serious attention to anything that could compromise the data protection of our customers or personnel. This data protection policy defines how Niemi aims to ensure lawful processing of all personal data and a high level of data protection. Our aim is to ensure that the data of our customers or personnel is never compromised.

### **Collection, use, storage and disposal of data**

All collection and use of personal data is based on a person's consent or other grounds defined in the law. The data obtained is only used for a justified purpose in order to produce the service and only for as long as it is necessary. Once the data is no longer needed, it will be disposed of appropriately. Data will only be disclosed to a specific recipient on separately specified grounds or on other grounds defined in the law.

### **Customer's access to their own data**

As the controller, Niemi is responsible for ensuring that the personal data file meets the requirements of the law and that the documentation required by legislation has been prepared regarding the data file. The data subject has the possibility to review or request corrections to the data by contacting Niemi in writing.

### **Ensuring data protection**

When implementing data protection, we pay particular attention to ensuring that unauthorized people do not have access to the data physically or through a machine. Matters related to data protection are taken into consideration in our employees' orientation and further training as well as in the user management of our systems. User management allows us to limit the availability of data to those who need it. All Niemi employees are bound by a documented obligation of confidentiality. If the processing of personal data is outsourced, a separate written agreement will be concluded.

### **Responsibilities and organization**

Unit managers are responsible for the implementation of data protection in their units. They are also responsible for the implementation if the processing of data is outsourced. All Niemi employees are responsible for complying with the data protection policy.

### **Procedure if data protection is compromised**

If it is suspected that data protection has been compromised, the case will be investigated immediately and the person(s) concerned will be informed. Data protection is compromised if the Niemi data protection policy, the related guidelines or the applicable legislation regarding personal data has not been complied with. If the act fits the description of a punishable act based on the legislation, the case will be referred to the authorities for investigation. In other situations we will assess the seriousness of the act and address it in accordance with the company's sanction policy.

### **How is the quality of data ensured?**

The aim is always to verify the quality and correctness of data from the person in question or from other reliable sources.

This data protection policy has been adopted by Niemi Palvelut Oy's Board of Directors on 11 May 2016 and will be reviewed once a year by the management.