



ATC Global Solutions Oy Ab
-and Travelcargo International Removals- division of-
ATC Global Solutions Oy Ab.

BUSINESS CODE OF CONDUCT AND CORPORATE RESPONSIBILITY POLICY

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BUSINESS CODE OF CONDUCT AND CORPORATE RESPONSIBILITY POLICY

1. INTRODUCTION

ATC Global Solutions Oy Ab- started in 2005 as a small family- owned business. Over the years, we have grown into gaining a significant place in the international removals business in Finland and into the Finnish logistics market, but our roots remain the same. We still believe -as when we started - that hard work well-done, big dreams & illusion and genuine care for our team and customers is the key to success.

Through the present document our intention is to highlight the ethical values and principles that underscore our business and which must always govern our activities.

2. OUR VALUES

We demonstrate our mission, vision, values, and principles of responsible business through policies on employment, environment, supply chain, and in the way we conduct our business and expect others to do.

The **values** we have at Travelcargo define who we are and how we work. They have remained the same since the start, and they will remain the same in the future, because we are convinced that working with high ethical standards is the only way to work.

- **People first.** We are a family company with strong family values which translates into caring and putting people first, no matter what, both customers and employees along with their families. We strive to provide excellent customer service, and we believe that it can only be achieved by providing a great work-environment.
- **Excellence.** Our standard is to deliver top quality services, working with expertise and being creative.
- **Responsibility.** We believe that we have a responsibility with society and we keep it in mind in everything we do.
- **Honorability.** We strive to find creative solutions that allow us to continue growing but that are cost-effective to the clients.
- **Reliability.** 100% engagement in our work and services.

3. BUSINESS CODE OF CONDUCT.

The core business principles, based on our company values that govern our activities are:

3.1. Compliance with effective laws and legislation always.

We carry on our business strictly in compliance with applicable law and regulations and in accordance with the highest standards of professional conduct and ethics. Where no legislation exists, we will seek to develop and implement our own appropriate standards.

3.2. Respect

- ❖ We respect people, their culture, dignity, and fundamental values.
- ❖ We do not allow any discrimination, harassment, abuse, or improper treatment of any kind.

- ❖ We interact with customers, other employees, suppliers, and in general, with any person interacting with the company in a fair way, regardless of their gender, gender identity, race, color, nationality, religion, political opinion, affiliation, age, sexual orientation, status, creed, incapacity, or disability.
- ❖ We believe family comes always first and that applies specially to our employees' families.
- ❖ We promote work-life balance, with remote working and flexible working hours. We believe our employees are responsible for their own work and we base our relationship with them on trust and respect.

3.3. Integrity and Transparency.

By conducting ourselves with integrity and transparency we generate trust, therefore:

- ❖ We believe in free, honest and fair competition, and we promote it.
- ❖ We do not personally profit from opportunities arising within our professional activity or from the use of the company's assets and information.
- ❖ We have Anti Bribery and Anticorruption Policies in place, which set out our standards related to the giving and receiving of gifts, hospitality and similar situations, and we also comply with FIDI's Anti-Bribery and Anti-Corruption Charter
- ❖ We provide our customers with accurate, truthful and understandable information on the products and services they buy from us and on our procedures when handling claims and resolving complaints. We commit to using clear, simple and understandable language when drafting contracts for our customers.
- ❖ When employing suppliers/ third parties, we base our decision on free competition. We contract our services in a transparent way, and we only engage suppliers who operate in accordance with best practices in ethical, social and environmental issues, and we review and audit our suppliers as a part of our quality programs.
- ❖ We comply with FIDI's Anti-Trust Charter.
- ❖ We have implemented Due Diligence, AML and Risk Management procedures to identify, assess and mitigate business, compliance and cybersecurity risks. diligence and AML policies in place

3.4. Excellence and Professionalism

We monitor our performance, set practical objectives for improvements and report our progress. Since excellence is one of our core values, we work rigorously and effectively, and customer satisfaction guides our conduct. We have Quality control systems implemented and in continuous development.

3.4.1. Customers relationships:

Customers are at the very heart of our business. We have in place customer feedback systems to consider customer needs and expectations and to continuously improve. We strive to find solutions that would allow us to continue growing but that are cost-effective for our customers. We recognize that our company has grown over the last years due to customer satisfaction and our aim is to continue providing quality services to satisfied customers. Our relationship with customers is always based on this code of conduct and striving for excellence.

3.4.2. Supplier, subcontractors and other partners

Our suppliers, subcontractors and partners play an important role in providing services based on excellence to our customers. We expect our suppliers, subcontractors and partners to uphold high ethical standards and comply and obey by all applicable laws and jurisdiction. Likewise, they must meet our standards set up for practices, reliability, quality and pricing. We maintain a documented quality control and assessment of our partners' services and conformity.

We introduce our principles of Social and Environmental responsibility, Code of conduct, Anti-bribery and Corruption, Anti-Trust and Confidentiality policies to our partners. We expect and trust our partners and suppliers to

adhere to the standards of professionalism set forth in them at all times in our mutual collaboration. We apply our Due Diligence policy when needed

When suppliers or software providers process personal data on our behalf, appropriate Data Processing Agreements (DPA) and confidentiality commitments are established.

3.4.3. Employees.

Our greatest assets are our people and the values and principles which motivate them. We respect and promote diversity, valuing the skills and contributions of each person.

Employees receive regular training on quality, environmental responsibilities, information security, GDPR, cybersecurity awareness and health & safety matters.

As a team, we are guided by a sense of dedication and a drive for excellence. We encourage our employees to be part of the company's development and to present and suggest at any times initiatives for improving and developing our professional services or our working environment.

3.5. Confidentiality

We uphold the confidentiality of the information that our customers entrust in us. Confidentiality of information among our customers, employees, management, suppliers and partners is one of the crucial aspects of trust underlying our business.

We have implemented policies and procedures on data protection, confidentiality and privacy that are regularly improved and revised. We protect the personal information of our customers, employees invest continuously in better information security systems and everyday tools and implement them to ensure our information security systems are current and as robust as they can be. We also require our third-party suppliers or companies with which we have dealings to safeguard the confidentiality of the information they may obtain in their relations with us, though DPAs when applicable.

We only use the information we receive for the purpose that it was given to, and we have policies and notices in place in compliance with GDPR and Finland's Data Protection Act regarding data processing.

We have implemented cybersecurity measures including multi-factor authentication (MFA), access controls, staff awareness training, phishing and smishing awareness initiatives, secure cloud-based systems and incident response procedures. Cybersecurity and data protection risks are reviewed regularly as part of the company's risk management process

3.6. Social and environmental responsibility

We have a commitment to society and the environment in conducting our business.

We integrate respect for human rights, equal opportunities and environmental sustainability into our objectives, in addition to financial benefit. We are committed to performing our activities under the principles of our Corporate Responsibility policy and we aim to mainstream this attitude throughout our entire service chain.

We will manage our business, products and services within the framework of our commitment to respect for the environment and people, settled in our Environmental policy. In a coherent way, we aim to support initiatives and projects that are respectful of the environment and that contribute to preventing, mitigating and responding to climate change, within our reasonable abilities.

3.7. Implementation and escalation procedure.

This document applies to all ATC Global Solutions Oy/ Travelcargo International Removals 'employees. All employees and management members are obliged to respect the values, principles and rules of this document, in their professional activity and internal interactions within the company, and their external relations with agents, customers, suppliers and society in general. We promote that our suppliers are governed by patterns of conduct and values that are like those set out here

We train our staff in this code of conduct, and we follow its implementation in our everyday life.

When doubts on its interpretation or practical application are present or a possible infringement must be notified, it should be done preferably via email to: tietosuoja@travelcargo.fi.

Violations of this code may lead to disciplinary actions.

Notifications of violations to this code of conduct will be handled without delay.

Reporting will always be confidential, and staff are aware that reporting will never affect negatively the reporter.

We aim to see our staff reporting of these matters as positive, since we believe following these principles will translate into a better and happier company for staff, management and consequently for customers.

4. CORPORATE RESPONSIBILITY POLICY

Our Corporate Responsibility Policy is rooted in our mission, vision and values. It is developed and complemented, in addition to the company's Code of Business Conduct with other specific company policies and procedures. Through this policy we recognize our obligation to act in a socially responsible way to our customers, to our staff, to our local community, and to the environment.

This policy reflects our strategy and basic operating principles in terms of corporate social responsibility. It is coherent and respectful with the principles described in the company's code of Conduct as well as with the rest of the policies and standards developed by the company that may apply.

We are committed to improving our performance in a way that is appropriate to our size of business and to the type of work we do.

4.1. Our commitments to the Environment

We aim to manage our business and provide our services on respect and protection of the environment, committing ourselves to the conservation of the environment and respecting the current legislation in this matter in each case.

We have implemented our Environmental Policy, where our lines of action are described. We support projects that help improve the environment in the long term. With our international removals, we are currently partners of #OURSEA, a charity campaign that aims to increase awareness of the condition of the Baltic Sea and raise one million euros for John Nurminen Foundation's work to protect the Baltic Sea and its heritage.

We comply with the current environmental standards in our country, and we work to improve internal processes and operations to enable a more efficient management of resources and minimize the environmental impact. We train our employees in our Environmental policy, and we try to promote a responsible attitude among employees, customers and suppliers.

Environmental objectives are monitored through the company's ISO 14001 Environmental Management System and reviewed annually through management review processes.

4.2. Our commitments with our clients:

Our customers are the center of our activity, and consequently, we will work to create solutions that would help them and minimize the impact in their environment.

- ❖ We only market and sale products tailored to our customers' needs. We review our marketing strategies to always ensure transparency.
- ❖ We seek to maximize the quality of our services by regularly monitoring customers' feedback and promoting employee's development discussions, to acquire a full picture of their views and expectations to improve our services.
- ❖ We aim to have an easy, accessible and active dialogue with customers and offer them agile channels for claims/complaints.
- ❖ We communicate transparently and clearly so that customers can make informed decisions, fully understanding services we provide, in accordance with the principles present in the company's Codes of conduct.
- ❖ We will always protect the confidentiality of customer data and uphold the highest standards of security.

4.3. Our commitments with our employees:

At Travelcargo, we value our employees and recognize that our workforce is the key to our success. Our employees create personal experiences that keep our clients happy and recommending us making our business develop. We were founded on the philosophy of **“creating a family business no matter what the size.”**

We want to provide a great working environment, free of harassment, intimidation and offensive or inappropriate conduct, and as such:

- ❖ We are dedicated to hiring, engaging and retaining a talented and diverse workforce from all around the world. We want our workforce to mirror the communities in which we live and work.
- ❖ We embrace the talents, perspectives and backgrounds of our diverse employees and offer an inclusive workplace setting.
- ❖ We are seeking to attract and retain talent.
- ❖ We strive to provide competitive levels of pay and benefits related to the industry and the local market.
- ❖ Our employees have access to services and training that support their well-being and encourage personal and professional growth.
- ❖ We are committed to maintaining safe and secure work environments that reinforce the principles of integrity and respect, and we have a **Health & Safety** policy that is reviewed annually.
- ❖ We support the elimination of workforce discrimination through our employment practices, particularly as demonstrated by our intense efforts into elimination language barriers at the company
- ❖ We respect our employees' right to decide if they wish to join, or not to join, associations or labor unions, however, we are clear in our commitment to communicate directly with our employees.
- ❖ We condemn all forms of exploitation of children, and we do not recruit child labor. We also support the elimination of all other forms of forced, bonded or compulsory labor and expect our suppliers to do so.

4.4. Our commitments in our business relationships.

- ❖ We aim to always ensure responsible management in our supply chain.
- ❖ We work only with suppliers that respect fundamental human and labor rights when carrying on their business.
- ❖ We expect and encourage responsible practices amongst our suppliers and partners (and their supply chains) by informing them of our business practices and what we expect of them or through contractual clauses when applicable.
- ❖ We audit regularly the social and environmental practices of some of our suppliers, and we act accordingly when findings are unsatisfactory.

❖ We expect and encourage our suppliers to adhere to all applicable laws and regulations of the countries, states and municipalities in which the business operates and to with integrity in all aspects of business and our business relationship.

4.5. Our Company commitments.

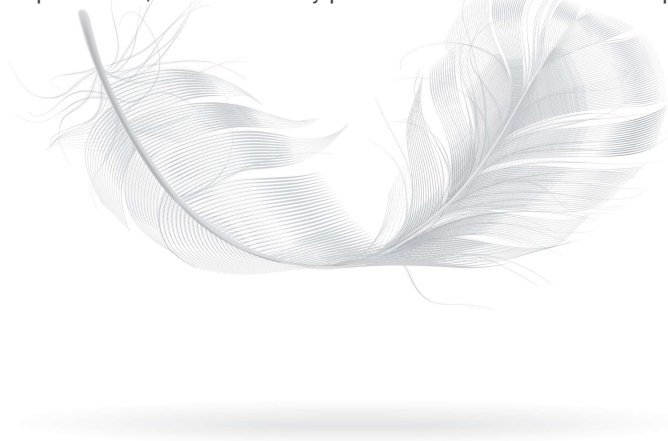
We are determined to carry out our work adhering to our values and always searching for excellence. We handled our management in general- and finances in particular- in a transparent and honest way, and in accordance with the relevant regulations.

We are committed to developing and aim to improve our performance continuously and use the resources necessary for it. We are committed to considering customers’ needs and expectations, technical developments, changing scientific evidence, and costs in the development and implementation of any new social and environmental policies and procedures and to aim to be at the best possible level at all times.

The company is committed to continuous improvement in quality, environmental performance, information security, cybersecurity and responsible business practices

We will follow implementation of this document on our staff, and we will communicate it to our suppliers and partners.

We will commence escalation processes / non-conformity processes whenever fail to compliance with these principles arise.



This document will be reviewed annually and updated when necessary. This document is available on the internal company's sites, as well as on our website.

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