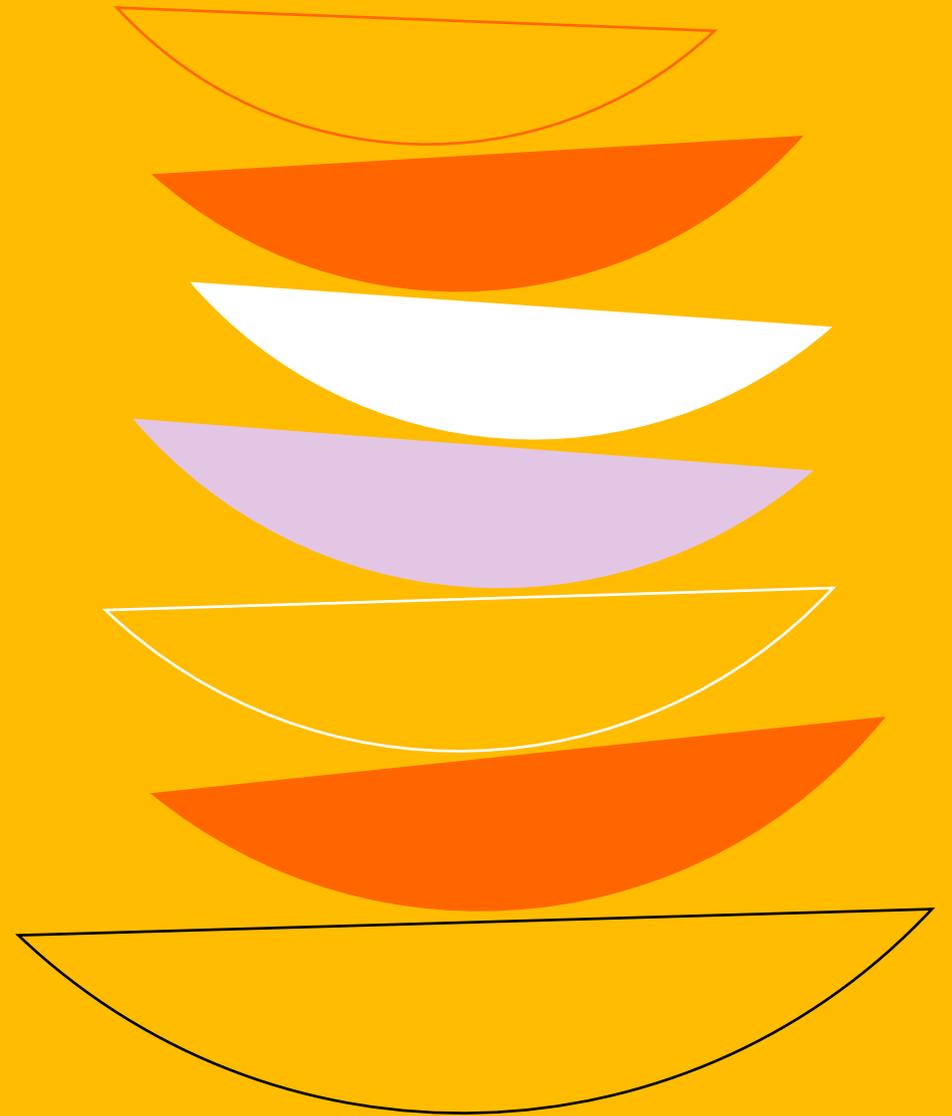


# Code of Conduct for Omniva Group



omniva

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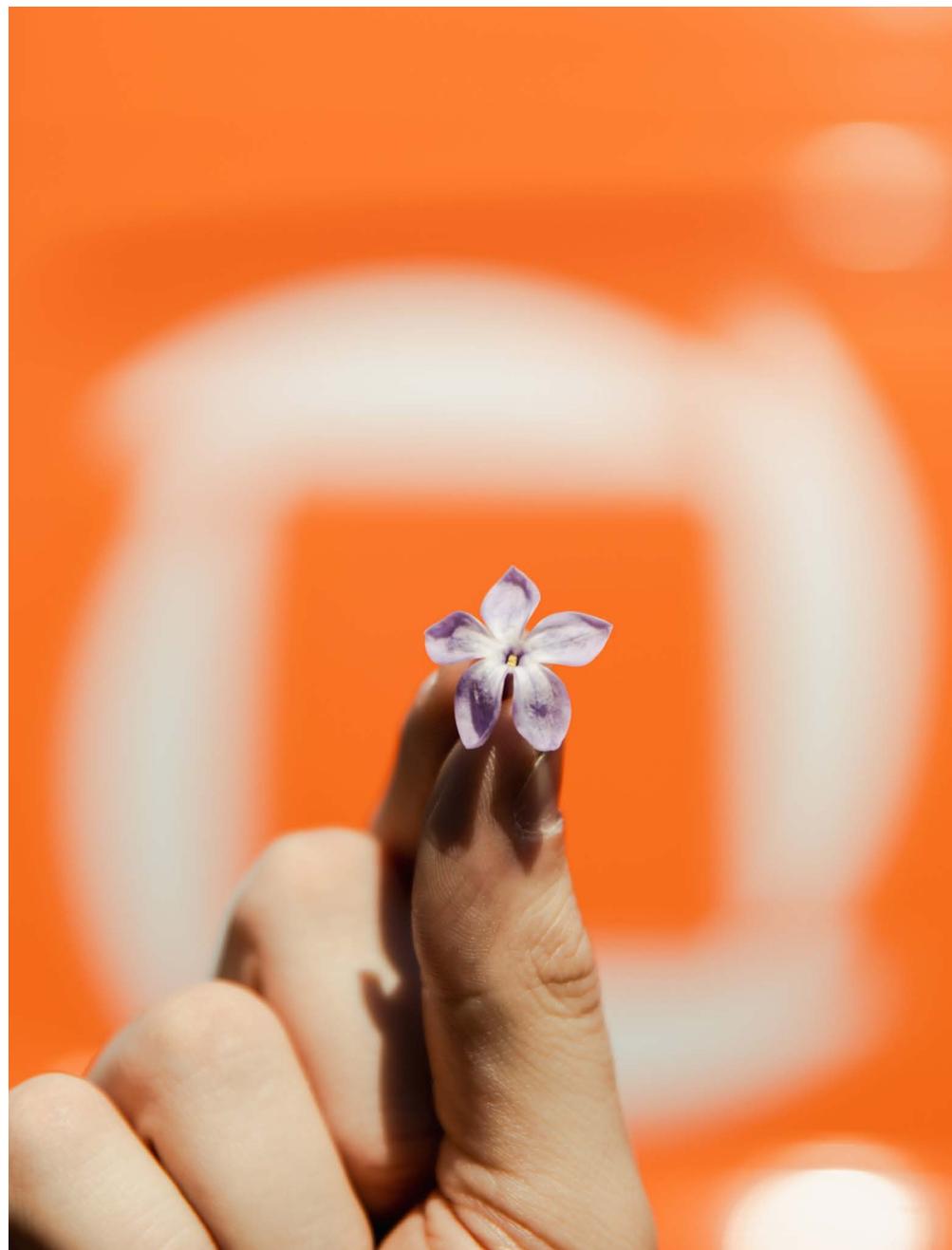
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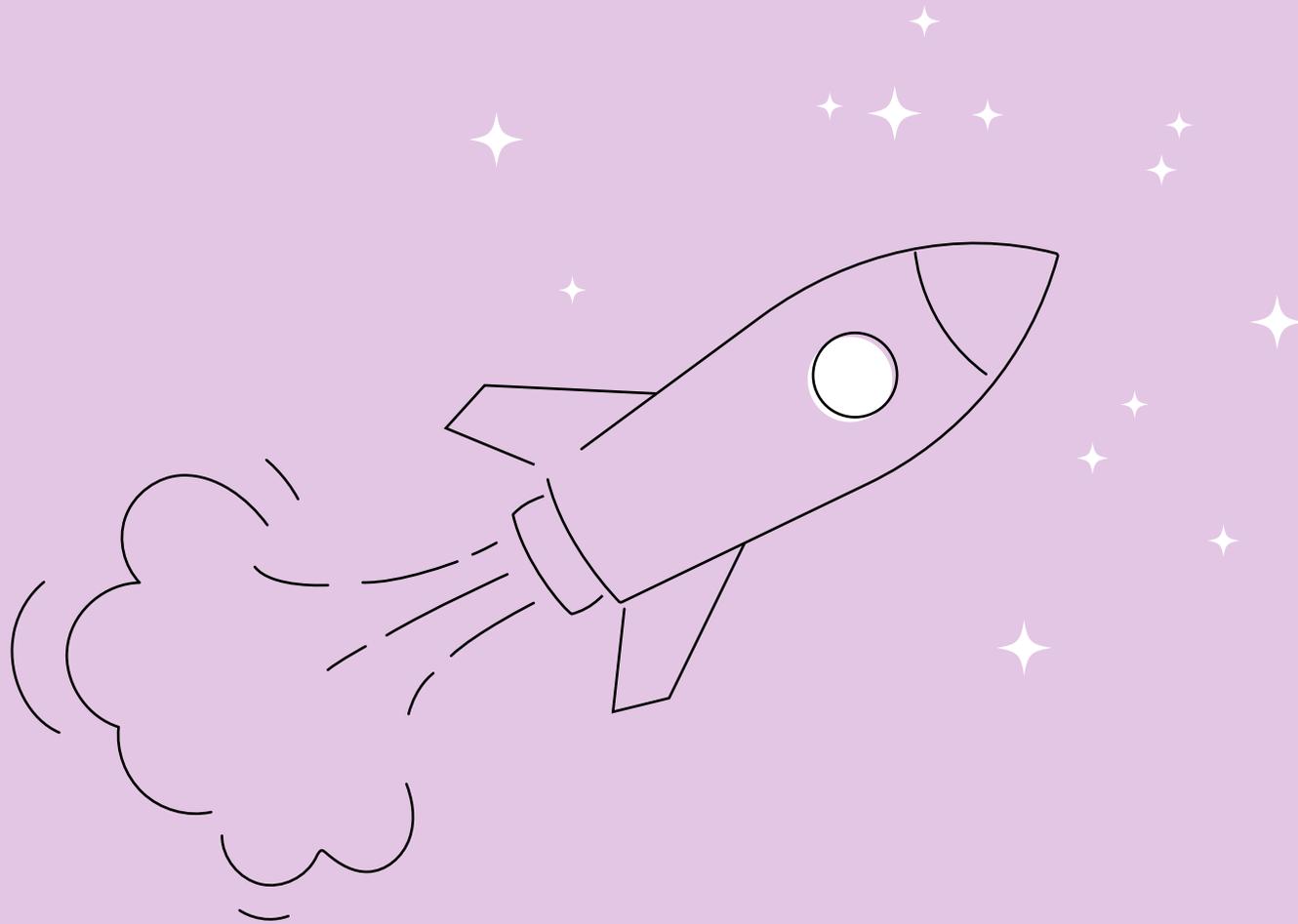
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# Introduction



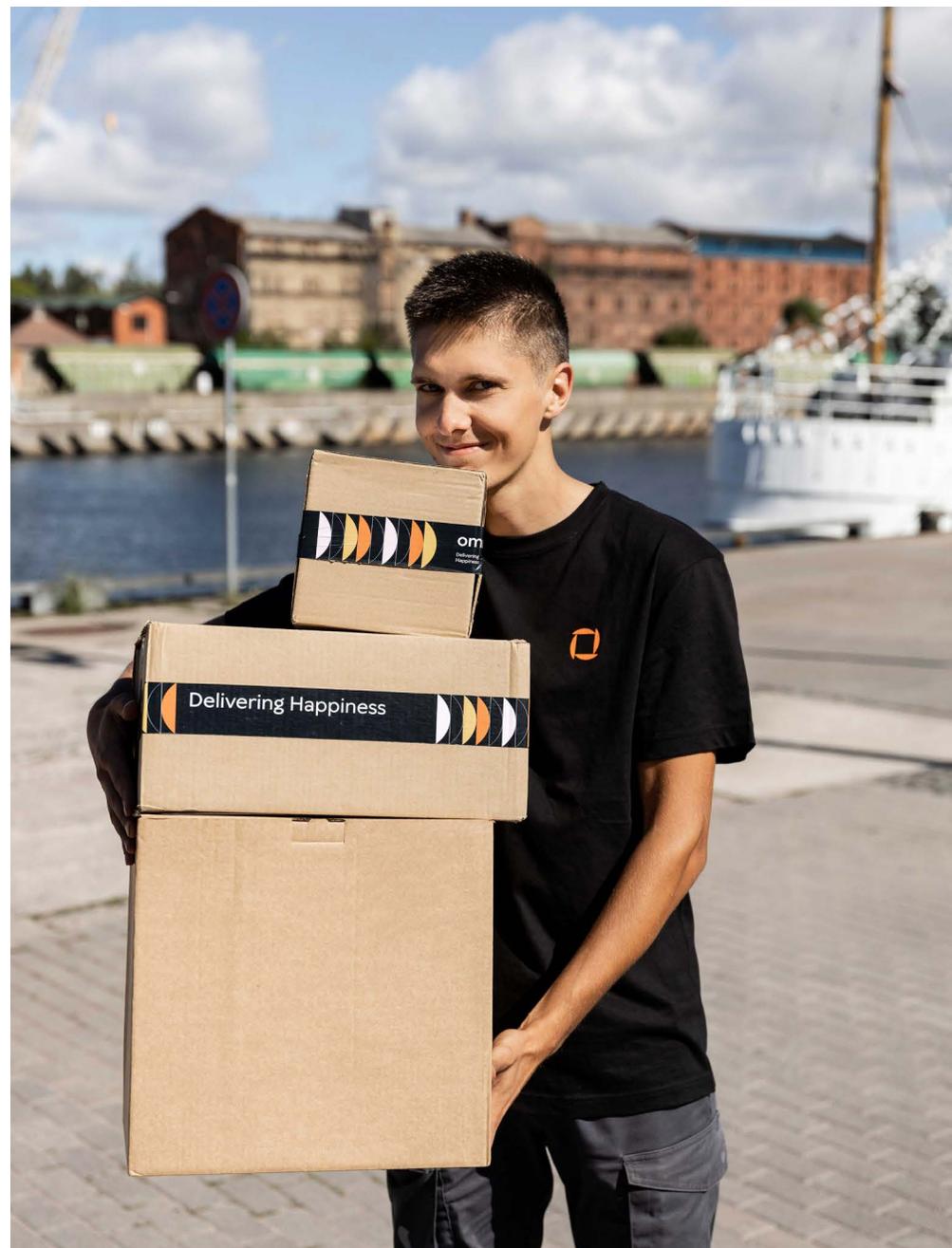
## Purpose and scope

Omniva Group (incl. our subsidiaries and affiliates, hereinafter Omniva) is committed to upholding the highest standards of integrity and ethical conduct to continue being a trustworthy partner to its employees, suppliers, and business partners. We apply international standards on human rights, working conditions, environment, and business ethics, and always strive to reach more than what is required by applicable laws and regulations. In order to maintain good long-term business relationships and positive cooperation, we expect the same level of responsible conduct from our employees, suppliers, and business partners.

**This Code of Conduct establishes and aligns business-related expectations which must be followed by:**

- Omniva's employees (incl. all members of the management board and the supervisory board);
- Omniva's suppliers and cooperation partners (hereinafter partners).

In case of conflict with the Code of Conduct, the national laws and regulations must be followed. This Code of Conduct is considered an integral part of the agreements between the partner or employee and Omniva and must be followed at all times.



## Company values

Omniva's daily decision-making and business operations are guided by our four core values which also enable us to deliver high-quality service to our partners and customers. This Code of Conduct and the supporting policies aim to further enforce our values.



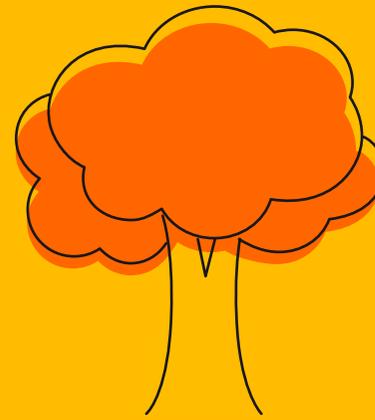
### We care

We always act with utmost care and respect, especially towards the deliverables that are entrusted to us and the environment that surrounds us. We value and actively listen to each other, our partners and our customers.



### We are open

We encourage fresh and innovative ideas which help us develop and grow as humans, experts, and as a company. We are not afraid to try new things – or to fail yet learn from our mistakes.



### We are trustworthy

We only promise what we can deliver, and always deliver what we promise. We always take responsibility for our work at Omniva!



### We enjoy our work and achievements

We encourage and help each other to always take the extra step, celebrate the achievement of our goals and praise each other for valuable contributions and productive teamwork.

Business  
integrity



## Conflict of interest

A conflict of interest occurs when an individual's personal interests (could) interfere with the interests of Omniva, thereby compromising the individual's judgment, decisions, or actions. A conflict of interest arises when an employee participates in the company's decision-making process in a manner that has an effect on the economic interests of the employee, their loved ones, or any legal persons related to the employee.

In order to avoid conflict of interest, Omniva's employees must not work directly under the supervision of their loved ones (family members, relatives by marriage, or other individuals who may influence our impartiality); or enter into contracts with any legal entities managed by or related to their relatives or close ones. In managerial positions, we refrain from hiring our family members or relatives by marriage as our subordinates. Furthermore, employees must not be members of management or supervisory bodies of Omniva's customers if this causes or may cause a conflict of interest.

In the case of forming any close relationships, employees must ensure that those relationships have no impact on their impartiality in performing their duties or cause conflict of interest. If necessary, the work organization must be rearranged.

**If you suspect a potential conflict of interest, ask yourself if:**

- the disclosure of this relationship or situation would have a damaging effect on you, your loved ones, the group, or
- if this relationship or situation could be somehow beneficial for you (or third parties) at the expense of the employer.
- If the answer is 'YES', there may be a conflict of interest, meaning that the situation must be discussed with the immediate supervisor (or a manager, if the situation concerns the immediate supervisor). If a conflict of interest has been identified, necessary remedial measures will be taken to eliminate it.



## Gifts, entertainment and bribery

Omniva prohibits bribery, extortion, and other forms of corruption. Therefore, Omniva employees and partners must not give, mediate, or accept any gifts or other benefits which may compromise the impartiality or the impartiality of the recipient of the gift/benefit or raise doubts of such impartiality having been compromised.

It is permitted to give and receive symbolic gifts which can unambiguously be interpreted as common courtesy to celebrate special occasions. This primarily means low-value souvenirs (e.g. a calendar, notebook, pen) or low-value gifts (e.g. flowers, chocolates) – more examples can be found below. In case of doubt about whether the gift influences the receiver's impartiality, the situation must be further discussed with the immediate supervisor.

We have a zero-tolerance policy for any form of fraudulent activity which includes but is not limited to fraud, money laundering, corruption, and theft.



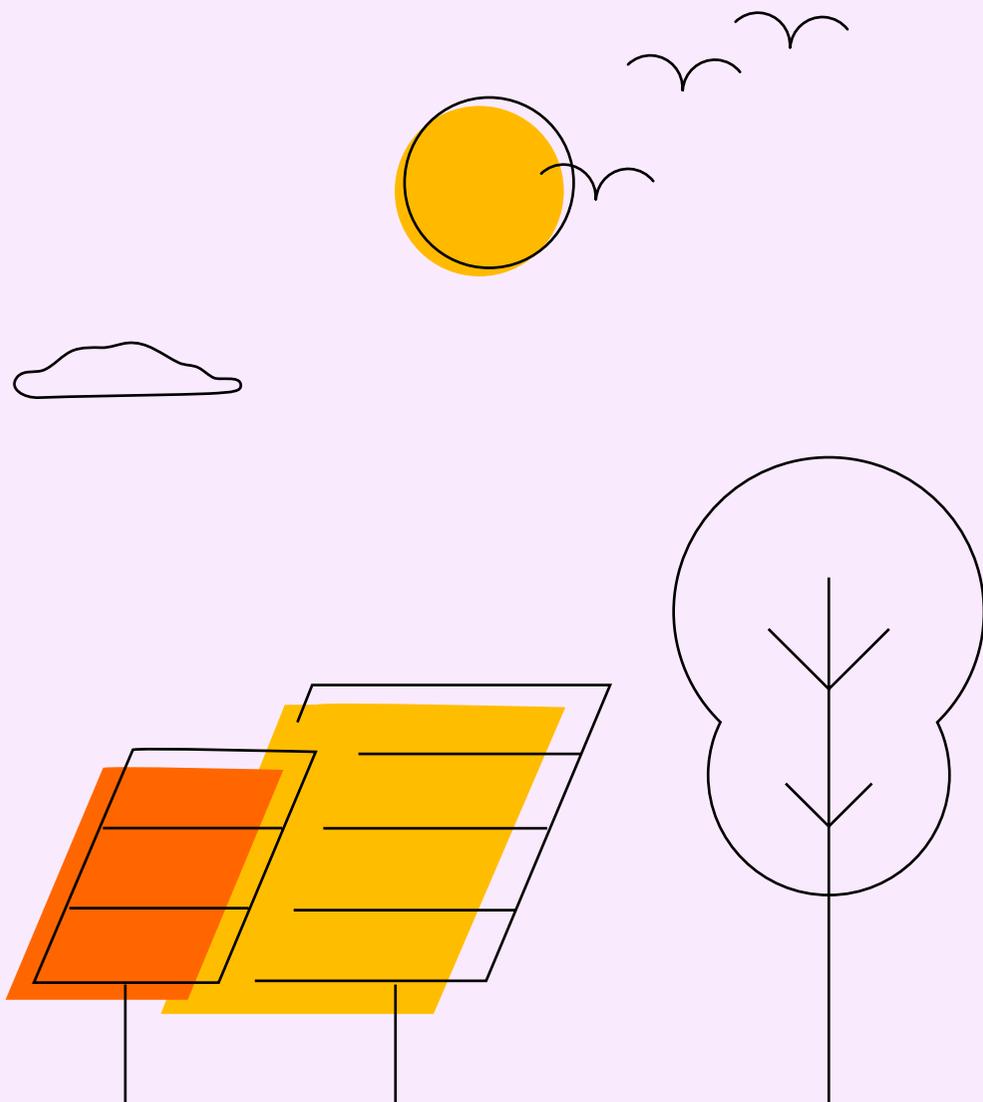
### In practice, acceptable gifts include but are not limited to:

- Small, inexpensive gifts such as a coffee mug or chocolates
- Promotional items such as branded merchandise which is distributed as part of marketing efforts
- Business-related materials, such as books or notebooks, also stamps or stamp collections
- Cultural gifts such as traditional items or souvenirs

Examples of gifts that can be a disguised form of bribery, (influencing employee's decisions or creating a sense of obligation toward the giver) meaning that their acceptance should be carefully considered and potentially discussed with your supervisor:

- Monetary compensation, such as cash or gift cards
- Expensive and lavish gifts, such as luxury vacations and expensive jewelry
- Employment opportunities





## Environmental responsibility

At Omniva, we recognize the vital importance of environmental protection and therefore conduct our business in an environmentally responsible and efficient manner. We are aligned with local and international laws and regulations while also actively seek opportunities to go beyond compliance requirements. Our annual, Group-wide carbon footprint assessment enables continuous monitoring, management, and ultimately – reduction – of our climate impact.

### In practice, we:

- comply with all rules, which relate to storing, handling, and offloading dangerous substances;
- avoid polluting the environment and reduce the amount of generated waste;
- prioritize efficient use of resources, including water, energy, and raw materials, in all of our operations;
- aim to reduce the environmental impact from transport and logistics where and as much as possible;
- ensure that our employees have the necessary practical knowledge, experience, and tools in environmental matters, to effectively fulfill their obligations.

In today's changing climate, environmental protection is everyone's responsibility which, means that all of Omniva's employees and partners are expected to join in and contribute to Omniva's environmental efforts.

## Respect for people

At Omniva, we are dedicated to upholding the principles of protecting human rights, ensuring the health and safety of our employees, promoting equality, and fostering a workplace free from discrimination.

### We respect human rights

Omniva recognizes and respects the rights that each and every individual is entitled to and upholds internationally recognized human rights principles defined in international agreements. These include but are not limited to the UN's Universal Declaration of Human Rights and the core labor rights of the International Labor Organization (ILO), covering topics such as child labor, forced labor, freedom of associations, etc. We adhere to all labor requirements and expect each and every one of our business partners to do the same without any exceptions.

To ensure a healthy workplace, we comply with applicable health and safety laws and regulations and have established safety protocols and trainings to minimize and possibly eliminate work-related accidents and injuries.

### We condemn discrimination

Omniva's organizational culture is free of discrimination, harassment, humiliation, bullying, and other impolite behaviors. All our employees, partners, and clients are treated lawfully, fairly, and equally, irrespective of their nationality, age, race, gender, language, origin, skin color, religion, disability, sexual orientation, political or other beliefs.

We embrace diversity in all aspects of our operations, including recruitment, decision-making processes, daily interactions, and the management of our Group. We firmly believe that diverse worldviews, as well as backgrounds bring unique perspectives and enhanced creativity, thereby contributing to our overall success.





## We support equality

We observe all legislation applicable in making any decisions concerning employment relationships (recruitment, employment, training and development, remuneration, and promotion) and refrain from discriminating against employees or candidates. We enter into and stay in employment relationships based on qualifications, values, and skills of the employee and ensure equal opportunities for all. Our remuneration principles are fair and transparent, and we actively strive to eliminate any gender pay gap.

## We foster kindness and respect

We communicate with our customers, colleagues, and partners in a polite, respectful, helpful, and attentive manner. We do not ridicule or shame an employee and it is unacceptable to bully a colleague, use offensive language or any kind of violence.

## Accessibility and inclusion

In Omniva, we commit to fostering an inclusive and accessible environment, ensuring that all individuals, regardless of their abilities, can fully participate in our community. We recognize the importance of diversity and strive to create an atmosphere that values and respects the unique perspectives and needs of every individual. Postal offices, parcel machines and different digital channels are all means to connect people and various communities. We believe that everyone should have effortless access to the benefits of our services via user-friendly and customized interfaces. We intend to continuously seek feedback from diverse customer groups and proactively address their needs. As an employer, Omniva fosters a workplace culture that values diversity. We firmly expect the same approach from all of our employees as well as partners.

## Fair competition, procurement, and purchasing

Omniva follows all rules of fair competition by providing services and offering goods in a professional manner and according to the agreed standards, methods, and rules.

Omniva's procurement and purchasing activities adhere to the highest standards of ethical business conduct and follow the principles of fairness and transparency. To ensure the full impartiality of our procurement processes, we avoid any conflicts of interest. Every potential supplier is made aware of the qualification and evaluation criteria and all are provided with equal opportunities. Supplier selection is free of any favoritism and is based on pre-determined evaluation criteria such as price, quality, delivery capabilities, compliance with standards, etc.

Omniva's environmental efforts extend also to our procurement and purchasing, where related processes and decision-making involve the sphere of sustainability. We evaluate potential suppliers based on their commitment to sustainable practices and seek partners who actively work towards reducing their environmental impact.

All procurement activities are accurately documented and archived. Transparency and accountability are fostered by documenting and submitting accurate data regarding our business practices, corporate structure, financial situation, and performance indicators, following the applicable laws and rules.



## Responsible marketing

Recognizing the influential power of marketing, Omniva acknowledges the importance of meeting high standards of conduct with regard to marketing activities. To ensure this, we act in accordance with the ICC Advertising And Marketing Communications Code which defines the principles for responsible marketing.

**Our commitments with regard to responsible marketing include but are not limited to:**

- providing honest and accurate information to ensure that our clients and wider society are well-informed about our services;
- being respectful, inclusive, and free from any form of discrimination based on national origin, gender, disability, etc.;
- not advertising directly to children under 13 years of age and paying extra care with regard to targeting more vulnerable groups such as disabled individuals.

Marketing practices extend beyond content matters, also involving topics such as customer privacy and data protection. To meet the high expectations in that regard, we always ask for the customer's consent prior to collecting or using their data and make sure to provide transparent information about our intent. Customer data is protected via robust safety measures to minimize the risk of accessing, losing, or misusing sensitive information.

## Customer service and satisfaction

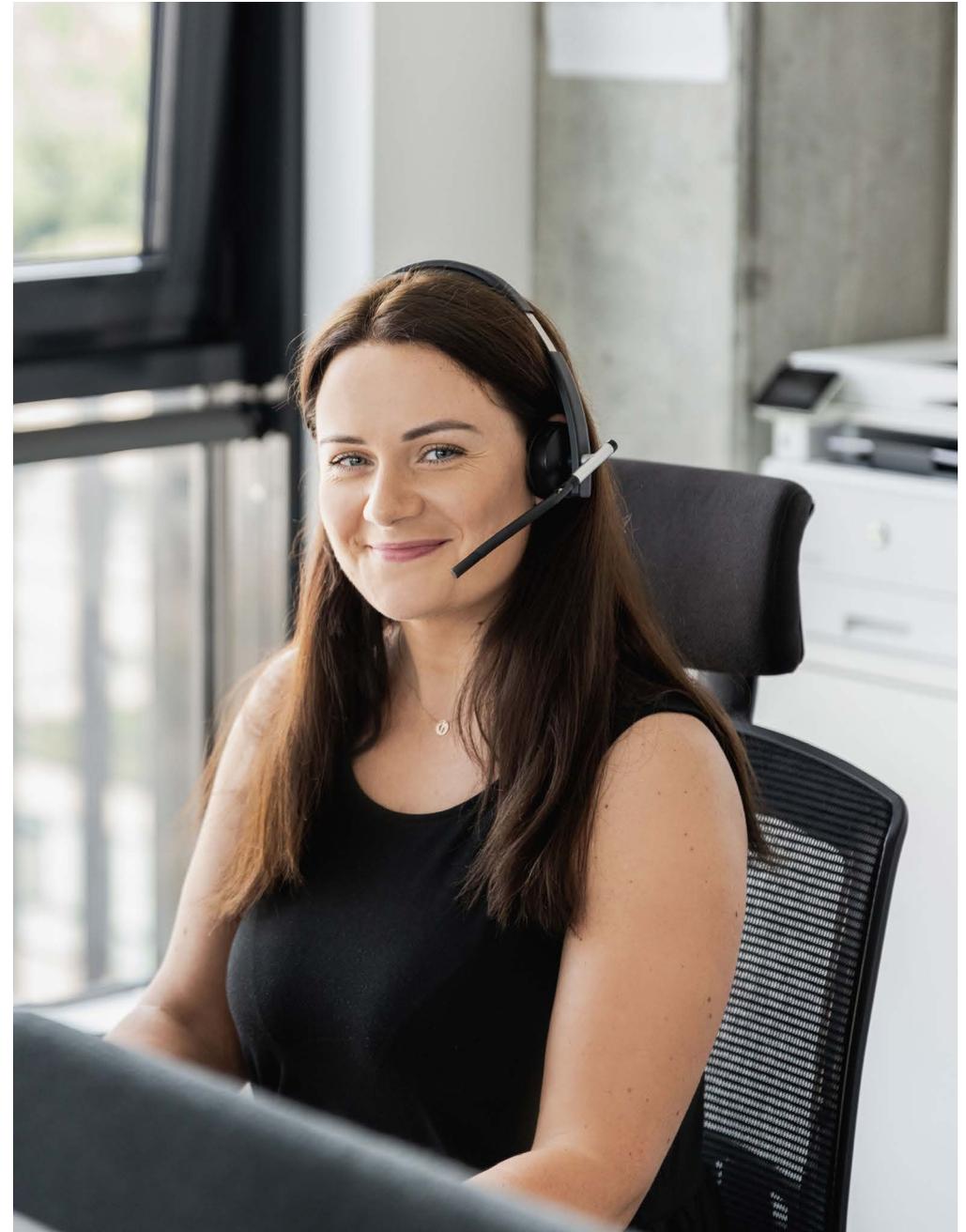
Omniva's purpose is to create value for customers by providing postal, parcel, and information logistics services. In this process, we are dedicated to providing exceptional customer service and ensuring customer satisfaction.

This goal rests on our central focus of being a trustworthy and reliable partner and is guided by our pledge to always:

- provide services transparently and fulfill our promises;
- prioritize the customer's safety and satisfaction;
- always strive to improve the quality of our services

Our customers are our priority. All of Omniva's employees are trained to address the customer's inquiries in a professional, respectable, and timely manner.

To ensure Omniva's continuous improvement and our customers' satisfaction, we welcome and actively seek customer feedback. After all, our customers can be viewed as our partners whose collaboration and cooperation are essential for Omniva's continued progress.



# Security



## Use of company assets, intellectual property, and resources

Our company's assets and intellectual property are essential components of our success and must therefore be protected and utilized responsibly.

Omniva's assets include but are not limited to equipment, tools, physical property, vehicles, software, etc., and must be used solely for legitimate business purposes related to Omniva's operations. Our employees and partners must handle the company's assets in a careful and responsible manner and refrain from their loss, damage, theft, or unauthorized access. Any related concerns or suspicions shall be reported immediately to the appropriate supervisor.

No less important is Omniva's intellectual property which includes but is not limited to copyrights, creative ideas, patents, and other information received while performing job duties. Such proprietary information must be handled in accordance with Omniva's guidelines, employment contracts, and other agreements between parties. Employees may not use or disclose intellectual property in any form without receiving previous written consent from the company or the group unless such right arises from the legislation. We respect the intellectual property of our partners, customers, and other external persons in the same manner.

Responsible use must also extend to Omniva's resources, including but not limited to cash, working time, means of transport, materials, etc. which shall be used appropriately, reasonably, and for fulfilling their job-related duties.

## Data and information protection



Protecting personal data and ensuring the privacy of our employees, partners, and customers is Omniva's top priority. We have established stringent guidelines and systems to ensure the safe handling of data and information at all times and in compliance with all relevant laws and regulations which apply to our employees and partners.

Our employees and partners must be mindful when handling Omniva's information and take all necessary steps to protect it. Discussing or commenting on internal matters such as future products, pricing, unpublished financial data, issues related to the services, etc. is prohibited in (social) media, public places (buses, cafés, stores, on the street, etc.), or in the presence of third parties.

Omniva's thorough policy on information protection also extends to IT infrastructure to safeguard against unauthorized access or tampering.

# Supporting information



## Oversight by the ethics committee

In order to ensure that ethical standards and the highest level of integrity are followed throughout the Group, we have created an information exchange, supervisory, and decision-making body – the ethics committee. The purpose of the committee is to ensure our activities' compliance with legislation and regulations, good business management practices, and Omniva's values by supporting the value and reputation of the company.

The committee is chaired by the Chief People and Change Officer and consists of up to six members who are appointed for three years. The company's management board approves the composition of the ethics committee and its working procedures. Board members may not serve on the committee. The ethics committee is responsible for monitoring and enforcing compliance with Omniva's Code of Conduct and related policies, and must report to the management board of the company.

Anyone requiring explanations or instructions in conduct-related issues or wishing to report any suspicions of Code of Conduct violation is encouraged to contact Ethics Committee by writing to the following addresses:

- [etika@omniva.ee](mailto:etika@omniva.ee) (in Estonia);
- [etika@omniva.lv](mailto:etika@omniva.lv) (in Latvia);
- [etika@omniva.lt](mailto:etika@omniva.lt) (in Lithuania);

## Speak-up line for confidential reporting

Omniva's Speak-up line and related procedure allows safe and confidential reporting of potential misconduct, violations, or unethical behavior. The system is managed by Internal Audit Department and guarantees anonymity and safety of the whistleblower.

Anyone who'd like to report potential misconduct or unethical behaviour is encouraged to contact us using the template available at:

- [www.omnivagroup.com/policies/](http://www.omnivagroup.com/policies/)(in English);
- [www.omnivagroup.com/et/eeskirjad/](http://www.omnivagroup.com/et/eeskirjad/)
- <https://www.omnivagroup.com/lt/nuostatos/>
- <https://www.omnivagroup.com/lv/politikas/>



## Expectations and reporting

Adhering to lawful and ethical behavior is crucial to Omniva's business operations, and we have zero tolerance for any violations of the Code of Conduct. This view is not only essential within our organization but also in our partnerships with external entities – we expect our partners to uphold the same high standards of conduct that Omniva follows. This adherence is subject to ongoing, ad-hoc monitoring and, if needed, further investigation. By maintaining a network of partners who share Omniva's values, we are able to foster a collaborative environment based on integrity, responsibility, and mutual trust.

In case misconduct has been identified, problems and conflicts are settled based on this Code of Conduct and the behavior of the parties is assessed based on relevant company policies. A violation may result in a warning or the termination of the contract/ agreement(s).

We assume that any information indicating unethical behavior is always provided in good faith, thus, once again, protection from potential retaliation and as well as confidentiality is guaranteed to anyone who provides the information. Any individual found intentionally providing false or misleading information will be subject to appropriate action.



## Other documents related to the Code of Conduct

Omniva may present its partners with additional instructions, policies, or requirements according to the nature of the partnership agreement and services provided, expecting those to be followed and met throughout the whole value chain.

**More detailed instructions, internal policies and requirements applicable for our employees can be found from our intranet.**

