



# Code of Conduct

Approved by the board, December 18<sup>th</sup> 2020  
Revised, March 2024



# ***Introduction***

Within Best Transport we have a long term perspective on our business with the vision to deliver honest sustainable last-mile and express services to our customers. Best Transport shall run its business based on integrity, business acumen, honesty and respect for customers, employees subcontractors and business partners.



Needless to say we shall do business according to international and local laws and regulations but on top of that we also need ethical standards. To describe our ethical standards, we have developed Best Transport Code of Conduct (the Code).

The Code emanates from, and complements, the company's key values - Customer focus, Cooperation, Engagement and Innovation – and applies to all our employees, management and the members of the board. For our subcontractors and business partners an adopted partner version of the Code is a part of our contract.

The Code sets standards for our ethical behaviour and serve as a guiding tool to help you to act correctly and make the right decision. Also, it should help you to understand our policies and to support our strategy and vision. However, the Code cannot cover every issue that may occur in our business. Therefore you should always use common sense when conducting business on behalf of Best Transport as the company's reputation and business depend on our – and your - actions and behaviour.

All employees, managers and members of the board are expected to read, understand and adhere to the Code when representing the company. If you are uncertain about any law, regulation or policy including the Code you should turn to your immediate manager, country manager or company management to ask questions.

If you don't find the guidance needed, or if you find yourself in doubt of the right answer in any given situation, ask yourself the following questions before you make your decision:

- Is it lawful?
- Is it ethical?
- Is it consistent with the Code?
- Would your action reflect well on the company and yourself?
- Would you want to read about it in social media or in the news?

If your answer is 'Yes' to all of these questions, proceed. If you answer 'No' to any of the above questions, refrain from proceeding! If you are still unsure, initiate a discussion with your immediate manager and seek guidance.

The aim of the Code is that all involved parties feels that Best Transport does honest business with good co-operation.

# ***Business integrity***

## **1.1 Competition**

Best Transport respects free and fair competition. All agreements, regardless of contract form, must always be negotiated in compliance with fair competition principles. Best Transport does not take part in any agreements – written or spoken – which limits competition. Therefore, you must not participate or be party to:

- Price-fixing
- Market sharing (dividing markets)
- Limitation or controlling of production or capacity
- Exchange of information concerning prices or other terms and conditions to third parties

## **1.2 Anti-corruption**

Best Transport are convinced that our services are competitive and price worthy. Therefore, we have a zero tolerance to offering or receiving bribes. The prohibition of bribery includes the transfer of any kind of asset and is not limited to monetary transfers such as personal kickback, gifts, loan, fee, remuneration or any other thing of value to or from another person or groups of persons as an incentive to influence or promote a certain act or decision. This also includes favouring a subcontractor on non-commercial terms.

You must not accept or offer a bribe of any kind. If you are asked to pay a bribe, the incident must be recorded and reported to your immediate manager, the company management or through the whistleblowing system.

## **1.3 Gifts and donations**

Entertainment, hospitality and exchange of business gifts are considered common practice in the markets Best Transport are acting. What is considered reasonable will vary depending on country and counterparts' culture.

Within Best Transport you are allowed to accept and offer gifts if the value does not exceed a reasonable level and are within the applicable laws and the gift, entertainment or hospitality is not intended to influence the recipient. In any instance monetary gifts are not allowed. Within Best Transport we shall not offer nor accept gifts or entertainment during a tender process or when negotiating with a business partner.

## **1.4 Whistleblowing service**

Best Transport's third-party whistleblowing service WhistleB provides an opportunity to anonymously report suspicions of misconduct. Through the whistleblowing service, one can also report any suspicions against people in senior positions at Best Transport, such as the company's CEO and the board. The whistleblowing service can be accessed through Best Transport's websites ([besttransport.se](http://besttransport.se), [besttransport.no](http://besttransport.no) and [besttransport.dk](http://besttransport.dk)) and on the company's intranet.

*The way we run our business and relations with business partners is based on integrity, business acumen, honesty and respect.*

# ***Human rights & social responsibility***

## **2.1 Human Rights**

At Best Transport we fully recognise the Universal Declaration of Human Rights (UDHR) in accordance with UN Resolution 217. We recognise our responsibility to observe those rights that apply to our activities involving our co-workers and the communities in which we work and live.

## **2.2 Social responsibility & equal opportunities**

At Best Transport we strongly believe that social responsibility and equal opportunities are essential for the company's future success. We believe that people with different backgrounds, of different gender etc gives us new perspectives that positively contributes to the success of the business.

We hire and treat our employees in a manner that does not discriminate with regards to gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social or ethnic origin. Needless to say, it is however important that all employees recognise the need of being able to commit to the company's processes and procedures regardless of background.

## **2.3 Safe and harassment free working environment**

We always want to provide a good working environment. We are also committed to providing the conditions for safe and healthy working environments for all of us working at Best Transport. We must all be proactive when it comes to protecting health and the working environments. Although Best Transport and its managers have the primary responsibility, all employees are also responsible for their own safety when performing their work and must therefore comply with all safety regulations and processes as well as exercise proper care to prevent accidents.

No form of harassment is tolerated within Best Transport. This includes, but is not limited to, harassment related to intimidation, discrimination, sexual, racial or otherwise, as well as acts or threats of violence.

## **2.4 Right of association**

We respect every employee's right to freedom of association and preference within institutional and recognised co-worker associations. We respect the rights of co-workers to join, form, or not to join, a co-worker association of her or his choice without fear of reprisal, interference, intimidation or harassment.

## **2.5 Fighting modern slavery**

Best Transport is committed to the fight against human trafficking, forced labour and debt servitude to avoid any form of modern-day slavery or human trafficking in our supply chains and in any part of our business.

## **2.6 A working place free of abuse of alcohol and drugs**

At Best Transport, we do not tolerate or allow alcohol abuse or the use/distribution of illegal drugs on any of our premises or when performing your duties. No one may work under the influence of alcohol or any substance that prevents co-workers from performing their work duties safely and effectively.

## **2.7 Working conditions**

Best Transport does not accept employment conditions that do not meet the minimum standards of national and local legislation.

- Employees are entitled to receive written confirmation of the terms of employment.
- Signed collective agreements shall be respected and followed.
- Working hours and minimum wages shall comply with national legislation.

## ***Environmental sustainability***

As one of the leading last-mile and express companies in the Nordics we are committed to take on our share of the responsibility to reduce the environmental impact of our business.

We shall actively work towards environmental sustainability and making the best possible use of our resources. Every employee has an important role to play in living up to this commitment in our daily work. All managers have a special responsibility to clearly communicate that environmental impact is a factor considered in business decisions, especially when it comes to long term re- and new investments. This will ensure that environmental commitment is central in the organisation.

At Best Transport we strive to run our business with less use of fossil fuel and that our terminals and offices are as energy efficient as possible. Our ambition is clearly expressed in our long term sustainability plan, which in turn is linked to UN's global Sustainable Development Goals.

## ***Customer focus & good co-operation***

At Best Transport we are committed to give our customers leading edge last-mile and express services based on Speed, Reliability, Innovation, Flexibility with continuously long term reduced environmental footprint. We strive to fully understand our customers' needs so that we can give them an honest and trustworthy proposition based on what we can do. In order to succeed we recognise the importance of building good climate for co-operation based on honesty and mutual respect between us and our customers. We never share information or data between customers, if not first approved by the customer whose information or data we would like to use.

## ***Final words***

At Best Transport we strive to have an open culture of inclusiveness. All employees and managers are encouraged and should feel empowered to come forward to discuss ideas, improvements, different views and in good faith raise any concerns regarding how to act in a specific situation. Each of us could potentially find ourselves in a situation where we are uncertain or have concerns. We should feel encouraged and empowered to share our views and to discuss uncertainties and concerns.

So, how shall you act if you have doubts about a certain action or decision or have thoughts about a co-worker's behaviour in relation to the Code? It is always best to address a situation or issue in a plain, straightforward manner directly with the person involved. But we also recognise that there might be situations when a co-worker might feel uncomfortable doing this. In that case you are advised to talk to your immediate manager, or, if necessary, the country manager or company management. On rare occasions an employee at Best Transport may feel uncomfortable to address an issue or a violation to the Code. The employee has the opportunity to use the whistleblowing system to report such violation anonymously. The whistleblowing system can be accessed through Best Transport's websites ([besttransport.se](http://besttransport.se), [besttransport.no](http://besttransport.no) and [besttransport.dk](http://besttransport.dk)) and on the company's intranet.

It's the responsibility of each manager of Best Transport to communicate, discuss and demonstrate the content and the true spirit of the Code by leading by example. At the same time – all employees have a personal responsibility to read and ponder over the Code and to actively ensure their behaviour supports compliance and the spirit of the Code.