



## **ATLAS BALTIC Ltd. Code of Ethics**

### **Preamble**

ATLAS BALTIC Ltd. and all affiliated companies (further referred as ATLAS BALTIC and ATLAS BALTIC Group) company Code of Ethics sets out the basis of the ATLAS BALTIC Group's relationship with customers, suppliers, staff and the law. It is derived from the Group's operating values and practices and the ATLAS BALTIC Spirit.

The ATLAS BALTIC Spirit's main elements are:

1. Two-way loyalty of staff to management and management to staff.
2. Commitment to quality service and a willingness to go the extra mile.
3. Valuing of people: demonstrating care for the interests of customers and all who do work for ATLAS BALTIC.
4. Building enduring relationships with customers and suppliers through long-term commitments and face-to-face contacts.
5. Honesty in communication with customers and all who do work for ATLAS BALTIC.
6. Compliance with all relevant laws, regulations and internal ATLAS BALTIC Group policies.

This Code of Ethics reflects these values and acts to preserve them. The Code addresses:

1. Global corporate ethics
2. ATLAS BALTIC customers
3. ATLAS BALTIC staff, subcontractors, consultants and suppliers
4. Community and environment

### **Global Corporate Ethics**

1. The ATLAS BALTIC Group respects and abides by the laws of the countries in which it operates and all relevant supranational laws and regulations. Further, ATLAS BALTIC people conduct their business in full understanding of, and in compliance with, ATLAS BALTIC Group policies including those covering corruption, bribery, money laundering, whistleblowing and trade sanctions.
2. The ATLAS BALTIC Group respects the rights and cultural practices of

people in the countries in which it operates.

3. The ATLAS BALTIC Group provides a work environment free of discrimination and harassment based on age, ancestry, colour, marital status, medical condition, mental disability, physical disability (including persons infected with the HIV virus or persons with AIDS), national origin, race, religion, sex, sexual orientation or veteran status.

### **ATLAS BALTIC Customers**

1. ATLAS BALTIC's customers can expect ATLAS BALTIC employees to do all within their power to meet their needs and exceed their expectations.
2. ATLAS BALTIC's customers can expect all ATLAS BALTIC employees to deal honestly with them and not commit any crime at their behest.
3. ATLAS BALTIC's customers can expect ATLAS BALTIC employees to work to create enduring and positive relationships with them.

### **ATLAS BALTIC Employees, Suppliers, Subcontractors and Consultants**

1. People who undertake work for ATLAS BALTIC do so cooperatively in a spirit of trust built on honest communication, professional conduct, fairness in business dealings and in full compliance with all laws and regulations.
2. The ATLAS BALTIC Group values highly the cultural diversity of all who undertake work for ATLAS BALTIC and nurtures their willingness and capacity to work together to achieve common goals.
3. ATLAS BALTIC employees ensure that workplace health and safety standards and practices are given priority and extend to all who undertake work for ATLAS BALTIC.
4. ATLAS BALTIC managers support the honest efforts of all staff to improve themselves and make provision for training and professional development to ensure staff are

appropriately equipped for the jobs they are required to do on behalf of customers.

5. ATLAS BALTIC managers recognize that all who undertake work for ATLAS BALTIC are connected to families and that the well-being of the family has an impact on their ability to work effectively.

6. ATLAS BALTIC employees will neither attempt to use their standing as employees of ATLAS BALTIC to derive a private business advantage for themselves, any associate or family member nor engage in any other activity which constitutes a conflict of interest between their private and professional roles.

### **Community and Environment**

1. ATLAS BALTIC managers are committed to creating a healthy and safe work environment for all who undertake work for ATLAS BALTIC.
2. ATLAS BALTIC companies are committed over the long term to creating a more sustainable environment through the development of effective recycling and waste management policies and practices.
3. ATLAS BALTIC employees recognize the importance of contributing to the well-being and development of the communities in which they work.
4. ATLAS BALTIC is committed to causing no harm to the environment.

Approved by

Viktoria Kekkonen  
Member of Board

ATLAS BALTIC Ltd.

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