

Nurminen Logistics — Code of Conduct

Practical rules for ethical, responsible and safe business

1. PURPOSE AND SCOPE

This Code of Conduct sets clear, simple rules for how we work at Nurminen Logistics. It applies to all directors, officers and employees in the Nurminen Logistics group. We also expect our suppliers, contractors and other business partners to act in line with these standards.

2. OUR COMMITMENT TO RESPONSIBLE BUSINESS

We are committed to responsible, ethical and transparent business across our operations and value chain. We comply with applicable EU and national laws and regulations in the countries where we operate. We follow internationally recognised standards of responsible business conduct related to human rights, fair working conditions, environmental responsibility and ethical business practices.

Nurminen Logistics reports yearly on sustainability in accordance with the Voluntary Sustainability Reporting Standard for SMEs (VSME). This Code supports our sustainability governance and helps us manage risks and impacts related to people, the environment and business integrity.

3. FAIR AND RESPECTFUL WORKPLACE

We treat everyone with respect and dignity and discrimination, harassment and bullying are not tolerated. We promote equal opportunity, diversity and inclusion. All decisions regarding an individual employee shall be based on merit, regardless of race, ethnicity, national origin, religion, gender, sexual orientation, age, disability, marital or family status, or any other characteristic.

4. HEALTH AND SAFETY

Safety is a shared responsibility across our operations, terminals, and partners — and everyone has the right to return home safe and healthy every day.

We always put health and safety first. In rail and terminal environments, risks can escalate quickly, which is why safety is never negotiable and is never sacrificed for speed, cost, or convenience. We comply with applicable health and safety laws and requirements, proactively manage risks, and continuously improve our safety performance.

Everyone is responsible for safety. We expect everyone working with or for us to follow safety instructions, use required personal protective equipment (PPE), and report hazards, near misses, and incidents without delay. If a task cannot be performed safely, we stop and reassess.

We pay special attention to traffic safety, fatigue management, loading and unloading safety, lifting and manual handling, and working around moving equipment.

We do not tolerate working under the influence of alcohol or drugs, or unsafe driving practices.

5. HUMAN RIGHTS

We respect and promote human rights. We do not use or tolerate child labour, forced labour or any form of human trafficking. We provide fair and safe working conditions and respect freedom of association and the right to collective bargaining where applicable.

We use a risk-based approach to human rights due diligence: we identify potential risks, prevent and mitigate them, and take corrective action if issues occur. We expect the same from our suppliers and other business partners.

6. ENVIRONMENT AND CLIMATE

We work to reduce our greenhouse-gas emissions by improving energy efficiency, optimising routes and loads, increasing load factors and overall capacity use, reducing empty moves, choosing lower-emission modes and fuels where feasible, and avoiding unnecessary transport.

We calculate our carbon footprint annually and work continuously to improve the quality, coverage, and reliability of the underlying data to ensure the most accurate assessment possible.

We support our customers in reducing transport-related emissions by offering rail-based logistics solutions, and by providing emissions information to support informed choices.

We comply with environmental laws and strive to prevent pollution, reduce waste and increase recycling.

We use resources responsibly (energy, water, materials) and pursue continuous improvement together with our partners and suppliers.

7. ANTI-BRIBERY AND CORRUPTION

We are committed to preventing bribery and corruption in all forms. We do not offer, promise, give, request or accept bribes, kickbacks (secret commissions / personal payments for awarding business) or other improper advantages — directly or indirectly.

We do not make facilitation payments, even in markets where such practices may be common. If you are asked for improper payment or feel pressured to act against this Code, you must refuse and report it.

Gifts, hospitality and expenses must be reasonable, infrequent and transparent, and never intended to

influence a business decision. Conflicts of interest must be avoided and disclosed to your line manager without delay if they arise.

We expect our suppliers, contractors and other partners to meet equivalent standards and we do not use third parties to do anything that we would not do ourselves. Concerns can be raised through your manager or our whistleblowing channel — retaliation is not tolerated.

To safeguard integrity and transparency in all our business dealings, we also monitor related party transactions and insider matters in line with our governance practices and all applicable laws and regulations.

8. PROTECTION OF ASSETS

Our assets enable safe and reliable operations — and protecting them safeguards our people, our customers' cargo, and our reputation. Company assets include our equipment and machinery, facilities, vehicles, IT systems and devices, company money and other financial resources, confidential information, and our brand. For financial assets we apply a strict control environment with multi level approvals and fraud prevention protocols. Financial and operative risks are managed in accordance with the enterprise risk management policy.

We all have a responsibility to use company assets responsibly and protect them from loss, theft, damage, misuse, and fraud.

We use company assets for legitimate business purposes and in line with internal policies. This includes protecting customers' cargo and related documentation.

If assets are lost, stolen, damaged, or misused, or if you suspect fraud or other security risk, report it immediately through your manager or our whistleblowing channel.

9. DATA PROTECTION, CYBERSECURITY AND RESPONSIBLE USE OF AI

We protect personal data and confidential information and use them only for legitimate business purposes. We follow security practices: strong passwords, multi-factor authentication, careful handling of emails and links, and prompt reporting of any suspected cyber incident. Nurminen also has a designated Data Protection Officer.

We use AI and automation responsibly. We check the accuracy of outputs, protect confidential data, respect intellectual property and privacy, and follow company guidance on approved tools. We do not upload confidential or personal data to unapproved tools or services.

We also manage cybersecurity risks in our operational technology (OT) and logistics systems, including terminal and rail operations. Suppliers and partners connecting to our systems must meet our minimum security requirements. Where we process customer or employee data with third parties, we use appropriate

contracts and safeguards, including data processing agreements and cross-border transfer mechanisms when required by law.

Nurminen Logistic PLC has instructions for its personnel, which are updated at least twice a year, for example on the use of AI and Information Security. In addition, Nurminen's operations comply with NIS2 requirements and regulations.

10. RESPONSIBLE COMMUNICATIONS AND SOCIAL MEDIA

We communicate responsibly and protect Nurminen Logistics' reputation. Only designated spokespersons speak on behalf of the company. When using social media, employees must be respectful, avoid disclosing confidential information, and make clear when views are personal. Company logos, images and customer references may be used only in line with internal guidelines.

11. FAIR COMPETITION AND ANTITRUST

We compete fairly and comply with competition laws. We never agree with competitors on prices, customers, tenders, capacity, routes or markets, nor exchange sensitive competitive information. Trade association participation must be carefully managed. If prohibited topics arise, we stop the discussion, leave if necessary, and report it to our manager or via our whistleblowing channel.

12. ANTI-MONEY LAUNDERING, SANCTIONS AND EXPORT CONTROLS

We do not facilitate money laundering or terrorist financing. We know our customers and business partners (KYC) and report suspicious activity as required by law. We comply with applicable sanctions and export-control regulations and screen parties and transactions where required in accordance with the group sanctions control policy and document the controls. We do not do business with sanctioned parties. Cash payments are avoided unless expressly authorised and justified.

13. SUPPLIERS AND BUSINESS PARTNERS

We choose suppliers and partners who share our standards. We expect them to respect human rights, provide fair and safe working conditions, protect the environment and prevent corruption. We reserve the right to assess and, where necessary, audit suppliers and partners, and to end cooperation if serious breaches occur.

Nurminen Logistics maintains a separate Supplier Code of Conduct. Suppliers and business partners are expected to comply with it in addition to applicable laws.

14. SPEAKING UP: ANONYMOUS WHISTLEBLOWING

We encourage everyone to speak up about concerns. Nurminen Logistics provides an anonymous whistleblowing channel that is available to employees and external stakeholders. Reports are handled confidentially, investigated promptly and fairly, and we strictly prohibit retaliation against anyone who raises a

concern in good faith.

How to report: Use our anonymous channel at <https://nurminenlogistics.ilmoituskanava.fi/#/>. Use local reporting options where required by law.

15. GOVERNANCE AND RESPONSIBILITIES

The board of directors approves this code and oversees its effectiveness. The ceo and executive management are responsible for implementation across all operations. The sustainability director maintains this code, coordinates communication and training, and provides guidance.

Reported concerns and investigations are handled through our reporting and whistleblowing processes, in cooperation with relevant functions as needed.

Managers must lead by example and support their teams in applying this code.

All employees must follow this code and complete required trainings. Breaches may lead to corrective action or disciplinary measures, in line with local law.

16. ACKNOWLEDGEMENT

I have read and understood Nurminen Logistics' Code of Conduct and I agree to follow it. If I am unsure, I will seek guidance and speak up about any concerns in good faith.