

# Code of Conduct



**This Code of  
Conduct  
approved by  
Cargotec's  
Board of Directors  
defines our  
common way  
of working.**

We want Cargotec to be the undisputed market leader in cargo handling systems and related services by being the number one choice for our customers and by growing our business profitably. In order to achieve this we need to attract and retain the best people in our industry. At the same time, we live amidst a rapidly changing environment where ethically solid judgement on how we conduct business is required.

This Code of Conduct approved by Cargotec's Board of Directors defines our common way of working. It determines how we expect all Cargotec personnel to behave in their daily work. I expect all of us in Cargotec to carefully read and acquaint ourselves with this document. The Board of Directors will review this Code periodically and make changes or further clarifications when necessary.

Our corporate policies and guidelines provide additional support and detail to various issues for which the principles are outlined in this Code.

We are all responsible for meeting ethical and compliance standards in our accomplishments. Everything we have established could be jeopardised by the carelessness of just one or few of us. We want our personnel to be proud of working for Cargotec.

A true market leader leads by example; we need to earn the respect of our stakeholders and the communities in which we operate through the integrity and responsibility we show in our actions. We also require our partners to adhere to similar principles.

Helsinki, 3 March 2014

**Mika Vehviläinen**

President and CEO

Cargotec Corporation



# We want to be a good corporate citizen in each jurisdiction we operate in.

## Compliance with laws and rules of society

We at Cargotec are committed to full compliance with applicable national and international laws and regulations. We want to be a good corporate citizen in each jurisdiction we operate in. We value transparency and business integrity and recognise that economic, environmental and social performance together form the basis for endorsing sustainability in our business operations.

### The main international codes

Cargotec supports are:

- United Nations (UN) Universal Declaration of Human Rights,
- UN Global Compact,
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and
- OECD's Guidelines for Multinational Enterprises.

# Business conduct



# Business conduct

## Conflicts of interest

Cargotec's personnel and Board members are expected to act in the company's best interests. Consequently, they must avoid situations where their personal interests may conflict with those of Cargotec.

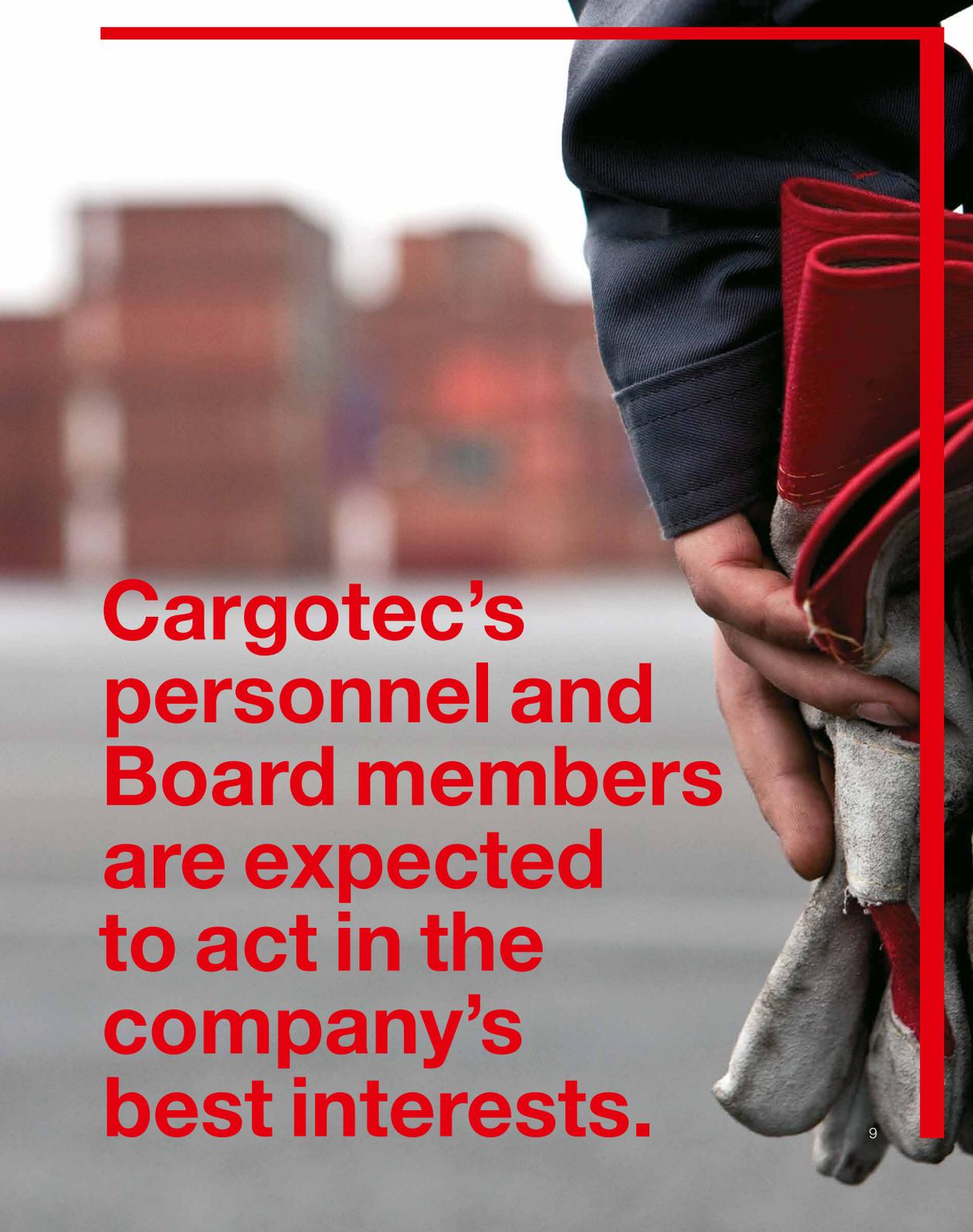
The establishment of business relationships must be based on objective criteria. Therefore, personnel must not offer, make, seek or accept such gifts, payments, entertainment or services to or from actual or potential business partners, which might reasonably be believed to influence business transactions and which exceed normal standards of hospitality.

## Insider management

Inside information means such undisclosed information that an investor would consider important in deciding whether to buy or sell a company's securities. Such inside information shall be held in confidence until it is disclosed or otherwise made available in the market.

A person possessing inside information is not allowed to trade in nor disclose the related information on the respective securities as long as the information is not made public.

Insider trading and use of inside information is regulated by insider legislation and monitored by financial supervision authorities. Cargotec Insider regulations further outline and clarify the practices that Cargotec expects all persons possessing and dealing with inside information to follow.



**Cargotec's  
personnel and  
Board members  
are expected  
to act in the  
company's  
best interests.**

**Cargotec  
engages its  
various  
stakeholder  
groups  
through open  
communication  
and dialogue.**

## Fair competition

We respect the rules governing free and fair competition and are committed to comply with applicable antitrust and other laws regulating competition. This extends to our general market conduct and to situations where competition law concerns could arise, such as, but not limited to, competitor contacts, information exchanges and industry associations.

Cargotec has issued a Competition compliance guide concerning the European competition law. Cargotec's Legal department is available for further advice and should always be informed if any unit or member of personnel is contacted by the Competition Authorities.

## IPR and other assets

We respect intellectual property rights and engage in transferring technology and know-how in a manner that protects these rights. We also respect our company's assets and do not seek personal gain through use of Cargotec property, information or position. We safeguard confidential information, also including information that suppliers, customers, or other partners have entrusted to us.

## Communication and stakeholder contacts

Cargotec engages its various stakeholder groups through open communication and dialogue. Stakeholder relationships are conducted with integrity, fairness and confidentiality. It is however understood that stock exchange rules may lead to certain restrictions in communication.

Cargotec co-operates with authorities and regulatory bodies at local, national and international levels.



**CARGOTEC**

A blurred background image of a person wearing a red shirt, seen from the side. The person is out of focus, and the background is a mix of light and dark colors, suggesting an indoor setting.

# Customer relations

**We operate  
worldwide with  
a long-term  
commitment to  
our customers.**



## Customer relations

The success of our customers is the key to our own success. We operate worldwide with a long-term commitment to our customers in order to be able to continuously meet and exceed their expectations. We strive to be the preferred supplier to current and new customers.

Mutual trust is built through the integrity of words and actions. Therefore commitments provided to our customers shall be truthful and correct. This behaviour is what we expect also from our customers.

## Supplier relations

Suppliers are an integral part of our total supply chain. We choose our suppliers with care and on the basis of objective factors such as quality, reliability, delivery and price, without preference for personal reasons. Suppliers are expected to conduct their business in compliance with international human rights and environmental laws and practices. Further, in their actions and operations suppliers and sub-contractors are expected to follow national laws of the countries they operate in.

We promote the application of this Code of Conduct among our suppliers and endeavour to monitor their actions in this respect.

**We respect  
the freedom of  
association of  
our personnel.**



# Work environment

## Health and safety

We are dedicated to safeguard the health and safety of personnel at work. Personnel have a responsibility to protect themselves, colleagues, work site, community and environment by reporting unacceptable health or safety conditions, taking preventive measures and minimising eventual damages.

As a technology leader we develop innovative systems and related services that meet the individual needs of our customers. We research, develop and work to improve the efficiency of the customers' cargo handling. We strive in our product development and in our quality assurance methods to minimise health and safety risks related to the use of our products and services.

## Non-discrimination

We are committed to equal opportunity in employment policies, procedures and practices. Furthermore, we are committed to a non-discriminatory work environment that values diversity regardless of gender, race, religion, nationality, age or physical ability or any other aspect of diversity. Harassment, be it face-to-face, written, electronic or verbal, is not tolerated. We respect the freedom of association of our personnel. As a company Cargotec does not act partially nor does it speak out nor commit to political parties or religious groups.

A large, textured white block, possibly made of stone or concrete, is the central focus. It features a stylized logo carved into its upper portion, consisting of a large, flowing 'C' shape that curves into a vertical line ending in a small circle. Below the logo, the word 'CARGOTEC' is carved in a bold, sans-serif font. The block is set against a dark, clear blue sky. In the background, a snow-covered roof of a building and some evergreen trees are visible under a twilight sky.

**CARGOTEC**



# Environment

# Environment

Cargotec is committed to responsible actions and takes environmental aspects into account when making business decisions. We strive to develop cargo handling solutions that are environmentally advanced and fulfil our customers' requirements.

Compliance with environmental standards based on legal directives is an important component of our environmental performance and we strive to improve our environmental performance, even if not required by law. We conduct internal audits to evaluate our progress.



**We conduct  
internal audits  
to evaluate  
our progress.**



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# Implementation

The purpose of this Code of Conduct is to set principles for Cargotec's way of working. We expect all our personnel to comply with the standards set in the Code.

Cargotec promotes the Code's implementation through effective communication of its contents to personnel. Internal audit acts as Corporate Compliance Officer and reports once a year or whenever appropriate to the Board of Directors on any issues arising within the organisation with regard to this Code.

Members of personnel should contact their manager with any questions or seek advice from the Corporate Compliance Officer or other relevant corporate officers. There will be no adverse work- or career-related consequences as a result of a member of personnel reporting possible violations.

Cargotec will take disciplinary action, up to and including termination of employment, against members of personnel who violate the law and regulations, this Code of Conduct, or other Cargotec policies.

The original language of this Code of Conduct is English. In the event of any discrepancies between translations, the English language document shall prevail.



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