



Kamux's *Code of Conduct*

Guide for employees



We want to be the fairest car retailer and the best place to work

We at Kamux believe that responsibility, ethics, honesty and quality are not just words – they are everyday actions. Excellent service and the customer’s trust are vital for us and, without them, we can’t close the deal.

This *Code of Conduct* contains the rules we play by at Kamux. Everyday work is easier when we can check what the correct way to act is, whenever needed. Kamux also aims to grow and become more international at a quick pace. Rules which apply to everyone and are the same everywhere are every employee’s right. It is crucial that everyone at Kamux, starting with the CEO, commit to following our *Code of Conduct*. We expect good and honest way of working from our partners as well.

Our aim is to ensure that each of us recognizes the situations where we need to stop and think about the right way to act. We also help others do this. If we notice that a colleague is acting against our rules, we step in and talk to them or to their manager. This is not

about introducing a dull set of rules or encouraging Kamux employees to supervise each other. This is all about smart, pre-emptive actions that help us avoid difficult and unpleasant situations. This booklet doesn’t provide answers for every situation. When we are not sure what to do, we turn to our manager.

Let’s pull together to make Kamux one of the fairest partners in the business and the best place to work!

Kind regards,



Juha Kalliokoski
CEO

“When we comply with Kamux’s *Code of Conduct*, we make sure that our customers buy their cars from us in the future as well, it’s good to work with our colleagues, and collaboration with our partners goes smoothly.”

Kamux's Code of Conduct in brief:



1. We are equal and fair at our workplace



2. The way we communicate is considerate and thoughtful



3. We do honest business



4. We are independent and do not tolerate corruption



5. We look after Kamux's property



6. We avoid conflicts of interest



7. We take care of our employees and the environment



8. We stop, think and consult when needed

Our commitment

Kamux operates internationally in the Nordics and Europe. Thus, our operations are directed by several different rules and agreements. We always comply with the laws, regulations and regulatory guides, and act honestly and ethically in everything we do.

We always act according to the United Nations' Universal Declaration of Human Rights as well as the employees' rights defined by the International Labor Organization (ILO).

The *Code of Conduct* presented here guides all our operations, and all our employees must follow it.

1.

We are equal and fair at our workplace

At Kamux, we treat all our colleagues, customers and partners fairly and equally, with no discrimination. We require our partners to do the same.

We show respect to each other and value people's diversity. We create a workplace atmosphere where it is enjoyable to work. We build a culture of trust, appreciation and support together.

We do not tolerate any kind of bullying, harassment, abuse or discrimination towards our colleagues, customers or partners. We also keep in mind that inappropriate compliments and comments and vulgar jokes may also be harassment. Bullying and harassment are always personal experiences. Although you may not feel that you have bullied a colleague, they might feel differently. We acknowledge this and respect others' points of view.

We always comply with labor legislation. We pay a fair compensation for work

and we reward our employees for good performance equally and considerately. When we hire new employees, we do so equally and fairly without discrimination based on a single attribute or personal background. We evaluate people only based on their competence and work performance.

At Kamux, we also respect everyone's privacy, religion, freedom of association and freedom to organize professionally.

Kamux is an intoxicant-free workplace. Alcohol, drugs and intoxication do not, under any circumstances, belong in the workplace, and we have zero tolerance for them. When we are celebrating, we can raise a toast in accordance with the manager's instructions.



Example

A colleague tells vulgar jokes every day. They also comment, often loudly, on the appearance of other colleagues. You know, however, that they don't mean to hurt anyone. How should you act?



We show respect to each other and create a workplace atmosphere where it is enjoyable to work. We build a culture of trust, appreciation and support together. We also keep in mind that inappropriate compliments and comments and vulgar jokes are also harassment. This is why you can point this out politely to your colleague. You can also discuss the matter with your manager.

2.

The way we communicate is considerate and thoughtful

Together, we are Kamux. We all build Kamux's reputation with our own actions. Let's look after it together!

Kamux's communications and marketing are open, well-informed and reliable. We do not personally represent Kamux to others except our customers. We do not, for instance, give comments or interviews to the media without first agreeing on it with Kamux's communications. Designated spokespersons work as the representatives of our company.

Kamux's employees have full freedom of speech, but we understand that public comments from our personnel are easily connected with Kamux. Thus, we avoid situations where we could harm Kamux's reputation. We also do not participate in discussions in social media in Kamux's name. We always remember to state that our opinions are personal and do not represent Kamux's stance.

We also take conversations at Kamux's premises into account: we do not discuss business or other confidential matters in the showroom space where customers can overhear us.

The email address provided by Kamux is meant for work matters. We do not use it, for instance, for personal online discussions or for participating in competitions.



Example

You notice that your former customer has commented on Kamux's post in social media. They claim that Kamux provided bad service and that they feel cheated. You remember the case in question and you know that the deal was made completely honestly and fairly. Should you comment on the message and explain what really happened?



Kamux's communications and marketing are open, well-informed and reliable. We do not personally represent Kamux: only designated and trained persons are allowed to act as representatives of our company. You can report the comment to Kamux's marketing which will take care of the matter.

3.

We do honest business

Our most important aim is a happy customer. We are honest and reliable partners and we maintain good and open relations with our customers, subcontractors and service providers. We also expect openness and honesty from our customers and partners.

At Kamux, we sell used cars in the condition they are in, so no flawless car exists. We talk about the cars and their potential shortcomings to customers honestly. We record the shortcomings and flaws in the bill of sale. We always comply with consumer protection legislation when we do business and inform our customers about our responsibilities as detailed in consumer protection legislation. We handle reclamations fairly, reasonably and in appropriate time. We also keep the customer well-informed of the progress of the reclamation. We fix potential undetected, hidden flaws afterwards according to consumer protection legislation. We expect openness and honesty from our customers as well.

We serve our customers regardless of their background and attributes. We offer financing for a car deal only through our partner.

We are fair to our competitors as well. We do not prevent or limit good competition and we do not disrupt other companies' operations. We do not violate competition legislation.

We make sure that all our colleagues know how to recognize hoax attempts and how to act in suspicious situations.



Example

A customer brings in a six-year-old car for sale. The car's electronics have a small problem which shows when the outside temperature drops to below two degrees Celsius. The flaw doesn't affect the car's use or safety. The problem is unnoticeable in the summer, but, in winter, the system gives failure signals. Do you inform potential buyers of the flaw although it doesn't currently affect the car's drivability?



At Kamux, we sell cars in the condition that they are in and acknowledge that used cars may have faults. In a sales situation, we provide the customer with a realistic idea of the car's condition and inform the customer of the faults we know of.

4.

We are independent and do not tolerate corruption

We at Kamux do not accept or give bribes or favors. We maintain our independence and do not owe favors. We have zero tolerance for corruption.

In our work, we do not accept or give bribes or free favors. Bribes can be clear, such as direct gifts or money, or hidden, like surprising discounts or free services. Expensive and impressive social events and, for instance, trips abroad paid for by another party can be bribes.

We can give and receive low-cost, justified and situationally appropriate gifts at discretion.

Given and accepted gifts may at most be worth 50 euros. We do not accept trips or other similar benefits, and we always pay for our own trips in accordance with our travel guidelines.

Social events held by Kamux are always justified and follow company guidelines, and it is not intended to use them to bribe anyone. Kamux's internal events support the company's operations and comply with the provided guidelines. For instance, events organized to reward teams are always connected with good work performance.



Example

A nearby car repair shop offers to fix your family Volvo's engine for free. The mechanic obviously hopes that as a favor in return, you will bring Kamux's cars to be serviced by them. Do you accept the offer?



As tempting as the offer sounds, you decline it politely. We at Kamux never owe favors to our partners.

Example

A customer wants to sell their car to Kamux and promises you a personal provision if the deal is closed. What do you do?



You decline to offer firmly and politely. You explain that Kamux's employees do not accept such fees from customers. You make a written offer on the purchase of the car and continue friendly service. Hopefully, you get to close the deal!

5.

We look after Kamux's property

We take care of Kamux's belongings together. We use work-related equipment for work only and we also take care of Kamux's immaterial property, such as information and data.

The cars for sale are Kamux's property and using them to drive is absolutely forbidden without special permission from a manager. For work-related car trips, we always use Kamux's business cars. Their use is detailed in separate instructions. The keys to all cars are kept in the showrooms, as per the instructions. We avoid situations where employees must be alone in the store.

We handle cash with care. We do not exceed the country-specific limit of accepting cash under any circumstances. Money laundering means that the origin of money or other property which has been obtained through criminal means is hidden. We never approve, support or make money laundering easier through our own actions. If you suspect potential money laundering, report the matter to your manager or to Kamux's financial administration.

We use Kamux's credit cards for the company's needs only. We do not give or lend our personal corporate credit cards to our colleagues. We use fuel cards only to purchase fuel for Kamux's

cars for the company's use. Fuel payment cards are personal. Everyone is responsible for their own card and its use and for ensuring that all receipts are returned with appropriate information included. A fuel card can be temporarily lent to a car courier for refueling, but even then, the cardholder is responsible for the proper use of the card.

We process bills and approve bills on time according to our internal instructions. We also keep our log-in details to Kamux's systems secret and do not share our log-in details with anyone else. We treat all customer information confidentially. We do not share our customers' information or talk about our customers to people outside our company.

The information we receive on Kamux in our work is also the company's property, and we do not share it with other parties, for instance a new employer. We also respect the confidentiality requirement of people who have come from other companies to work for Kamux, and we do not pressure our colleagues into sharing information about their former employer.



Example

You've met a new interesting partner and you would like to make an unforgettable impression by picking them up for a date in a world-class sports car which arrived in the store last week. You think to yourself that no one will probably mind if you borrow the car for one evening and return it in the morning, all clean and its tank full. What do you do?



The cars for sale are Kamux's property and using them to drive is absolutely forbidden. We take care of Kamux's property during working hours, and you certainly don't want to assume responsibility for the car in your leisure time.

6.

We avoid conflicts of interest

In our work, we always make decisions for the good of Kamux. We do not participate in competing business or advance our own interests in work matters.

We never advance our own benefit or the benefit of our family and friends in our work tasks. Personal relationships shall not affect our work. We do not practice business competing with or disrupting Kamux's business.

We do not under any circumstances alter the purchase or sale price of a car for the benefit of ourselves or our family or friends, not even when the change would be small.

We understand that we must stay away from decisions that concern ourselves, our friends or family members. For instance, we do not participate in recruiting new employees if a friend or a family member has applied for the job.



Example

You are about to arrange a tendering process for cleaning services. Your friend has just started their own cleaning business that can offer a suitable package for your store. What do you do?



You cannot directly choose your friend's or your family member's company as a service provider for your own company. You can recommend your friend's firm to your manager or your colleague, but you must not participate in the tendering, evaluation and choosing of the service provider.

7.

We take care of our employees and the environment

We look after our colleague's working conditions and work safety every day. We know our responsibility of the environment and nature, and we act to advance better traffic culture.

Kamux is a safe place to work. We take care of comfortable and safe working conditions at all our offices. We take care of work ergonomics, the correct equipment and clothes and safe ways of working.

Together, we ensure the safety of our shops and offices: we lock the doors and make sure that unauthorized people cannot access our premises. We avoid situations where employees have to be alone in the showroom. We also remember to lock computers and take care of data security.

We at Kamux act to advance safer and better traffic culture. We set an example on the road. We follow speed limits,

drive economically, and we never drive while intoxicated. We exert special caution when we drive company cars. That is when we represent Kamux in traffic.

We take environment into account in all our operations. We comply with environmental legislation and advance sustainable development. We dispose of problem waste and recycle car tires in a due manner. We favor environmentally friendly products and material. We also expect that our partners do the same.



Example

Used batteries and one set of badly worn tires have lain about in the showroom's storage room for quite some time. They are always in the way, and it is high time to finally get rid of them. The batteries would easily fit in the shop's mixed waste bin. Your colleague asks for help to carry the batteries to the bin. What do you do?



You remember that batteries and tires are not mixed waste but problem waste and recyclable material which should be disposed of appropriately. You take care that the waste is taken to the correct place. You also suggest going over the recycling procedures together with everyone.

8.

Stop, think and consult

When you encounter an ethically challenging situation in your work, stop, think and consult!

Every day, we encounter different kinds of people, places and decisions in our work. If you are not sure how to act, do this:

1. Stop

In a difficult situation, stop before you do anything. Pause the situation and take a moment to think about what has happened. This way you won't make any rushed or poor decisions.

2. Think

Consider the situation from different angles. What would it look like to

our customer, partner or a media representative, for instance? Would you have to explain or cover up your own or your colleague's actions? Check for guidelines in this *Code of Conduct*. Also check if there are more detailed guidelines on the matter.

3. Consult

You can always turn to your colleagues or your manager for help and advice. If the difficult situation concerns your manager, you can contact their manager.

Filing a report

You can report possible misconduct or violations, acts violating Kamux's Code of Conduct or suspicion thereof also to the company's management, if needed. Kamux employees can also file reports using the anonymous whistleblowing channel (<https://report.whistleb.com/fi/Kamux>).

In misconduct cases, action will be taken immediately. Filing a report does not result in negative consequences to the person who reported the issue. Potential cases of misconduct are always investigated fairly and confidentially. Violating Kamux's Code of Conduct always results in appropriate consequences to the person who violated the guidelines.

General feedback can be provided by email to report@kamux.fi.



Example

You start to feel uncomfortable in connection with recruiting a new employee. You are in the process of hiring a new sales manager and three applicants have been chosen for the final round. One of them exceeds the others in terms of experience and competence, but your manager favors their own relative. The experience and competence of the manager's favorite doesn't measure up to the other two applicants. What can you do in this situation?



The situation does not follow ethical guidelines. In this case, we ask you to contact the manager of your manager or Kamux's management and report your observation to them.

