



**SUSTAINABLE GROWTH  
FROM GENERATION  
TO GENERATION**



SUSTAINABILITY  
REPORT 2019

SUSTAINABILITY

# ASPO SUSTAINABILITY REPORT 2019

**4** Innovative solutions that help to minimize emissions and energy consumption reduce the environmental footprint of ESL Shipping's LNG-fueled vessels.

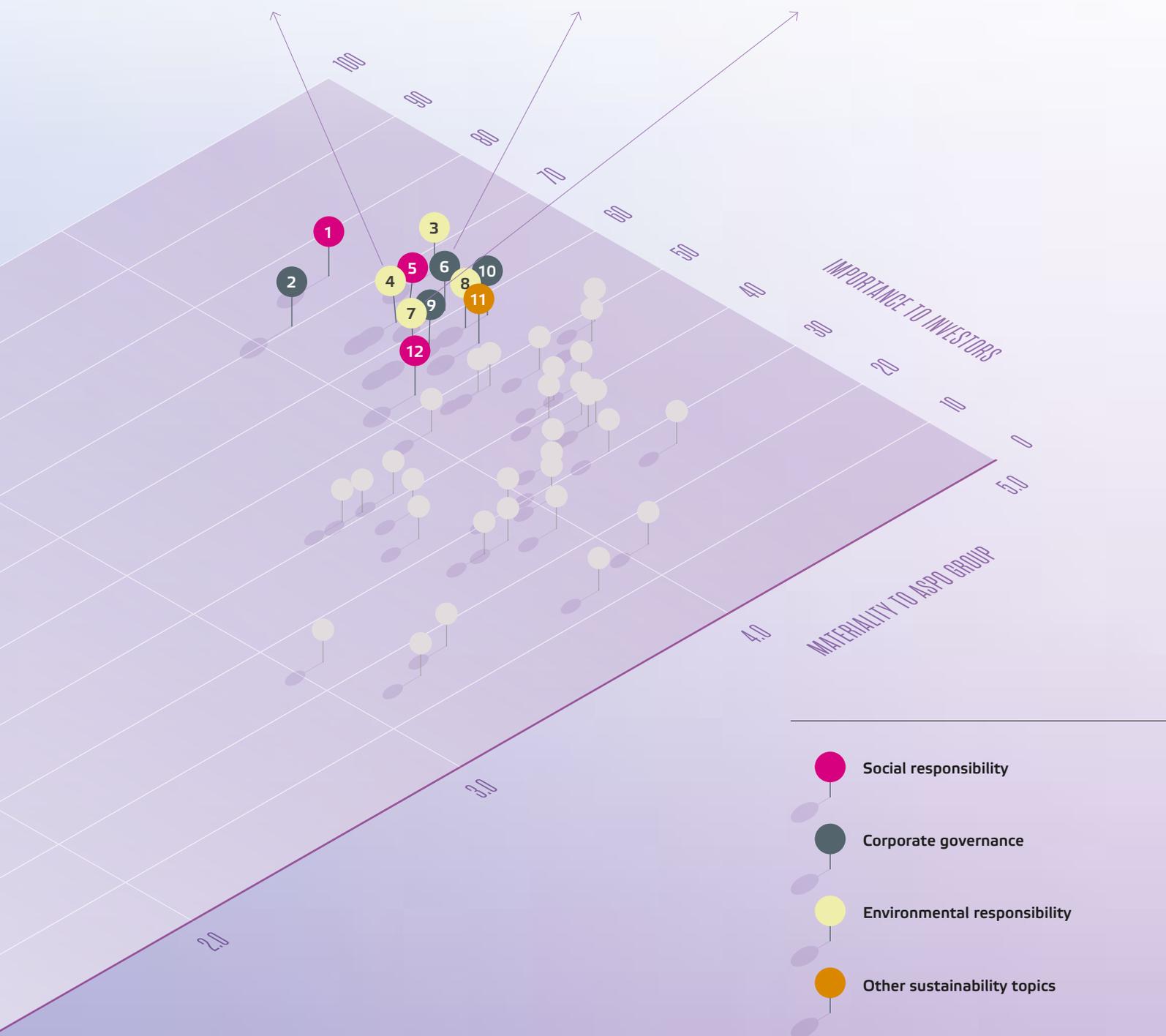
[+ Read more p. 23](#)

**6** Aspo Group's compliance program was completed in 2019.

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**7** In August 2019, Telko was the first Finnish distributor to receive the ISCC Plus certificate.

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- Social responsibility
- Corporate governance
- Environmental responsibility
- Other sustainability topics

Aspo believes that socially, financially and environmentally sustainable business is a requirement for creating long-term value. A responsibly led, growing company can create jobs, tax revenues and wellbeing. Aspo Group's CEO is in charge of the management of Aspo's responsibility. The CEO reports to the company's Board of Directors in accordance with the risk management policy. Aspo's Code of Conduct defines a common set of rules for responsible business in all the Group's subsidiaries. The Board of Directors of Aspo approved the revised Code of Conduct in December 2019.

Since 2018, Aspo has been a member of the UN's Global Compact initiative, and the Group's operations are steered by the ten Global Compact principles related to human rights, working life principles, the environment and the prevention of corruption. In 2019, Aspo also joined the corporate responsibility network FIBS. Aspo aims to actively develop its responsibility at a group and subsidiary level.

The stakeholder survey completed in 2019 and the materiality assessment prepared on its basis help us to steer our corporate responsibility and stakeholder processes toward the factors that are most significant for our stakeholders and are also

related to the key financial, social and environmental impacts of our business operations.

Based on the materiality assessment, Aspo's most significant areas of responsibility are:

- The engagement of employees and the improvement of wellbeing at work
- Openness and compliance with regulations and the Code of Conduct
- Environmentally friendly innovations and reduced emissions
- Product safety

As a conglomerate, Aspo's different businesses partly have highly different focus areas in their responsibility. ESL Shipping has actively reduced its environmental footprint by minimizing its fleet's emissions and energy consumption. The opera-

tions of Leipurin focus on product safety, and the reduction of waste and wastage. Product safety is also essential for Telko, which acts as a link between industrial customers and international raw material manufacturers. However, Aspo's Code of Conduct and responsibility priorities steer all operations at Group level.

The aim is to conduct the stakeholder survey regularly and redefine Group-level priorities as necessary. The goal set for 2020 is to define short- and long-term responsibility targets for every subsidiary. Progress in reaching these targets will also be monitored in Aspo's responsibility reports.

Every year, Aspo reports the fulfillment of the Global Compact principles as part of this account of non-financial information in accordance with the requirements set out in the Finnish Accounting Act and EU Directive 2014/95/EU. The Board of Directors of Aspo approves and signs this information annually when approving the financial statements.

**Helsinki, February 27, 2020**

**ASPO Plc**

**Board of Directors**

**CEO**

WE SUPPORT



1. Engagement of employees and job satisfaction
2. Openness (e.g. publication of financial and non-financial information, remuneration of members of the management and governance)
3. Environmentally friendly innovation (e.g. new low-emission vessels, green product portfolios)
4. More effective and reduced use of fuel (e.g. route optimization)
5. Improved wellbeing at work
6. Compliance with the Code of Conduct (e.g. prevention of corruption and the support of human rights in Aspo's operations and supply chain)
7. Increased share of recycled, renewable or biodegradable products
8. Helping to mitigate climate change, reduced CO<sub>2</sub> emissions and carbon neutrality
9. Governance (e.g. governance structure, shareholders' rights, ethical business, compliance program)
10. Risk management
11. Product safety
12. Management of human capital

The stakeholder survey conducted during 2018 and 2019 investigated the opinions of Aspo's shareholders and potential investors regarding some 40 different responsibility areas and their impact on Aspo's business operations. The areas were defined by an external consulting company and Aspo's Group Executive Committee. Selected personnel from Aspo Group and its businesses, as well as members of the Board of Directors, also responded to the survey. The diagram represents how respondents to the stakeholder survey rated the most significant responsibility themes.

## ENVIRONMENTAL SUSTAINABILITY

# CONCRETE ACTIONS FOR THE ENVIRONMENT

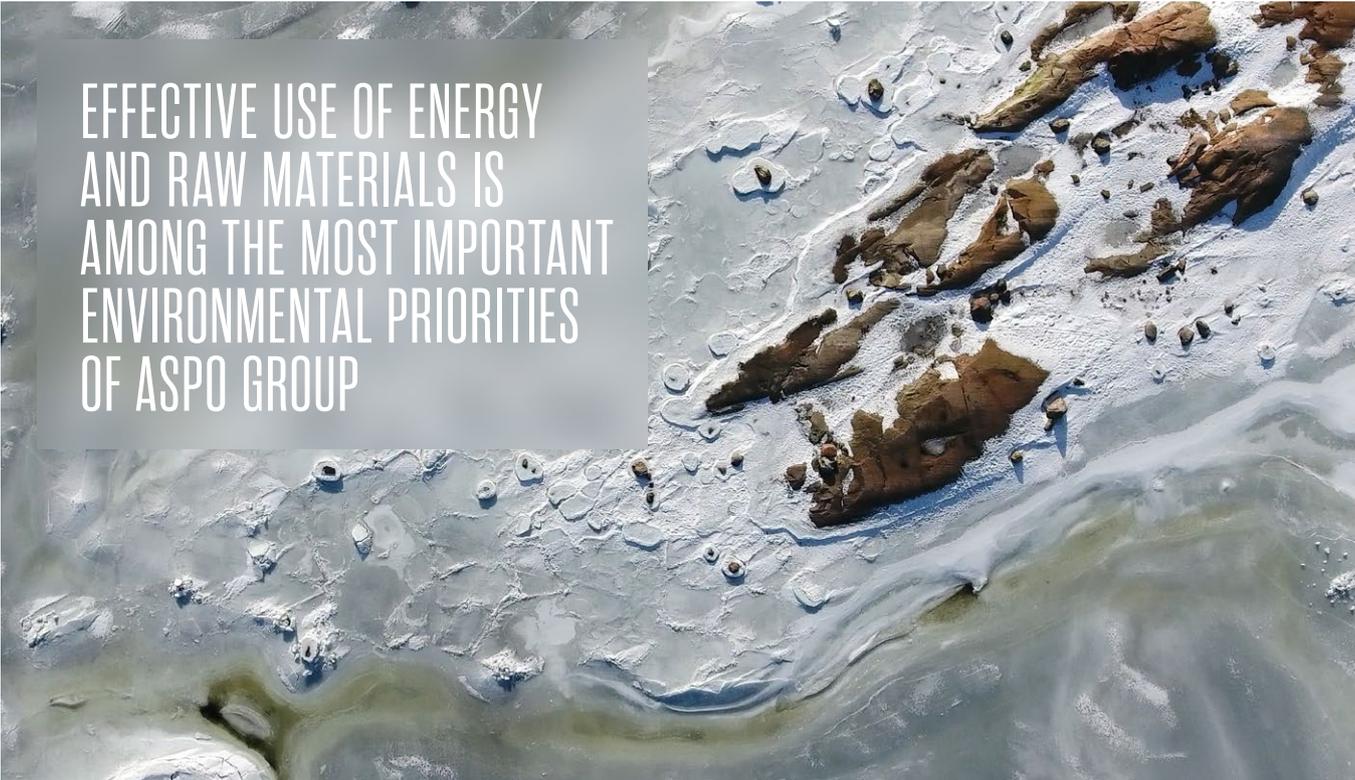
**For Aspo, environmental sustainability means selections and concrete actions for the good of the environment in all its businesses. In a conglomerate, key business-related environmental aspects and impact may vary significantly between different subsidiaries.**

Actions and selections are supported by environmental guidelines and regulations that define a common set of rules for the Group's subsidiaries. Their leading principle is the continuous improvement of businesses. In order to address environmental aspects in supply chains, Aspo has prepared the Supplier Code of Conduct. Aspo's reputation as a responsible conglomerate that attends to its environmental impact is an important competitive factor for Aspo. After all, environmental issues are valuable to customers and other stakeholders. If realized, environmental risks could cause significant financial losses or tarnish Aspo's reputation.

The Group has classified environmental damage resulting from its operations and

especially from fuel processing in the shipping company's operations and the practices of its partners, for example, in the transport and storage of chemicals as significant risks associated with the environment. Changing regulations, such as stricter environmental laws, any changes in energy policies and the development of fuel taxation, can also have a significant impact on operating conditions and costs. Aspo actively monitors the regulatory situation and aims to develop its operations cost-effectively and at the correct time so that it can keep any investment needs resulting from changing regulations under control.

Aspo prepares for and controls risks through productive environmental management. For example, ESL Shipping, which operates in the sensitive ecosystem of the Baltic Sea, has its own environmental management system, certified by ISO 140001. In 2019, ESL Shipping registered four (2018: 4) minor oil spills. These were handled properly and resulted in no consequences from the authorities. Oil did not



**EFFECTIVE USE OF ENERGY AND RAW MATERIALS IS AMONG THE MOST IMPORTANT ENVIRONMENTAL PRIORITIES OF ASPO GROUP**

## TELKO CONDUCTED THE FIRST SUSTAINABILITY AUDITS FOR ITS SUPPLIERS IN 2019

reach the sea in two cases, while in the other two, approximately 30–40 liters of oil or oil-containing water leaked into the sea. One of these latter incidents took place when a hydraulic hose was damaged when using a vessel's hatches. As a result, some 10–20 liters of oil leaked onto the deck and into the sea. The alerted rescue authorities decided that no control measures were necessary. In the other incident, a vessel's bilge tank overflowed through air pipes due to the ongoing maintenance of the ballast water system. As a result of this incident, some 20 liters of oil-containing water leaked into the sea. As in the first case, the rescue authorities did not consider control measures necessary.

In Telko's operations, warehouse audits conducted in partners' facilities comprise a significant part of environmental management. Audits conducted in 2018 in Latvia, Kazakhstan, Ukraine, Russia and Belarus were continued in 2019 by audits in Finland, Russia and Ukraine. In Russia and Ukraine, the audits discovered slight non-conformities in compliance with safety guidelines: the marking of emergency exits, product placement and the display of first aid equipment. In addition, one instance of a significant breach of safety guidelines was discovered when auditing a warehouse in Ukraine: warning labels had been removed from containers containing flammable liquids soon to be delivered to customers, because the

arranged transport did not have an ADR permit for transporting hazardous goods. Telko discontinued its cooperation with the warehouse in question. Guidelines have been specified regarding the warehouse in Russia, and compliance with the guidelines will be monitored. In Finland, warehouse audits revealed minor deficiencies in product labels. Telko also prepared general guidelines on storage safety and distributed them to all Telko's warehouses in different countries during the third quarter of 2019.

Telko started to plan specific sustainability audits in 2018, and the first on-site audits were conducted in Russia and China in early 2019. During the audits, Telko's representatives and external consultants interview representatives of suppliers regarding sustainability and responsibility, and discuss Telko's requirements for human rights, environmental responsibility and safety guidelines, for example. Facilities and production plants are also audited. In addition to on-site sustainability audits, a larger group of suppliers is monitored through self-assessments.

A more effective use of energy and raw materials plays a key role in reducing the Group's environmental impact. ESL Shipping's most significant environmental aspects are associated with improving the energy efficiency of its fleet and reducing its carbon footprint, for example, by optimizing the sailing speed and fuel economy of its vessels. All ESL Shipping's vessels are fueled by environmentally friendly low-sul-

## THE AMOUNT OF LEIPURIN'S LANDFILL WASTE DECREASED BY 51%

### WASTE - LEIPURIN

tons	2019	2018	2017	Change <sup>2</sup> , %
Utilized	<b>271.33</b>	88.78	75.7	305.6
share of total sales <sup>1</sup>	<b>2.34</b>	0.73	0.62	320.0
Landfill	<b>152.27</b>	298.36	300.74	-51.0
share of total sales <sup>1</sup>	<b>1.32</b>	2.46	2.45	-53.4
Energy	<b>22.87</b>	42.49	54.38	-53.8
share of total sales <sup>1</sup>	<b>0.20</b>	0.35	0.44	-56.4

<sup>1</sup> Share of total sales reported waste ton per EUR million

<sup>2</sup> Change 2018–2019

## TELKO'S GREEN PORTFOLIO BUSINESS IS EXPECTED TO GROW AND BECOME COMMERCIALY SIGNIFICANT IN THE NEXT FEW YEARS

fur oil or nearly sulfur-free liquefied natural gas, which significantly reduces carbon dioxide emissions. In recent years, Aspo has invested more than EUR 100 million in the development of its shipping company, and a significant part of this investment has been directed at improving the fleet's energy and cost-effectiveness. Examples of these investments include m/s Viikki and m/s Haaga, the most environmentally friendly LNG-fueled dry bulk cargo vessels in their category.

In 2019, the installations of ballast water treatment systems in accordance with new environmental regulations were started. During the year, the system was installed in ESL Shipping's largest vessel m/s Arkadia. The installations will mainly take place in 2020 and 2021 during the regular scheduled dockings. For m/s Viikki and m/s Haaga, the ballast water treatment systems were installed already during the construction phase of the vessels. The purpose of these treatment systems is to prevent alien plant and animal species from accessing new living environments through ballast water. For example, the Baltic Sea has more than 100 alien species, many of which can also be found on the Finnish coast. Alien species may displace original species living in the Baltic Sea, altering the structure and functioning of the entire ecosystem.

The goal of Leipurin is to reduce its environmental footprint especially by minimizing food wastage and the volume of waste. Leipurin has significantly reduced its wastage in recent years. Leipurin achieved its 2019 goal of reducing wastage by at least 25% in Finland, with wastage reducing by a total of 46% year-on-year. In Finland and other countries, the utilization of waste was increased by raising the amount of waste used as feed and recycled waste. Reducing wastage was possible, for example, by improving the efficiency of procurement activities and holding monthly meetings between procurement, sales and quality. These helped to accelerate the storage turnover rate.

In addition to reducing the environmental impact of their own operations, Aspo

Group's businesses provide their customers with solutions that help them to reduce environmental loads in their entire production and supply chains.

Telko is playing its part in improving the circular economy involving plastics and is providing its customers with environmentally sustainable solutions. In 2019, the Green Portfolio business, focusing on sustainability, made up 1.1% (1.2%) of Telko's net sales. Although this percentage remains very low, Telko's Green Portfolio is expected to become a commercially significant business during the next few years. Growth is also expected in western markets, in particular, while customers in eastern markets are also interested in raw materials suitable for the manufacture of biodegradable plastic bags and solvent-free paints, for example. Research and development operations have increased to develop the range of alternate plastic raw materials. Furthermore, Telko aims to increase fiber-based and recycled plastics, and their relative proportion. In August 2019, Telko was the first Finnish distributor to receive the ISCC Plus certificate. ISCC Plus is a certificate granted for bio-based plastics. Accordingly, Telko can provide plastic raw materials produced in line with mass balance principles for its customers.

## ESL SHIPPING HAS MADE SIGNIFICANT INVESTMENTS TO IMPROVE THE ENERGY EFFICIENCY OF ITS FLEET



## FIVE-STAR ENVIRONMENTAL TECHNOLOGY

In April 2019, MS Viikki and MS Haaga, ESL Shipping's dry bulk cargo vessels fueled by liquefied natural gas (LNG), received the highest five-star environmental label from Clean Shipping Index (CSI). CSI is an independent non-profit organization. Its research methodology is assessed by a technical committee consisting of specialists and researchers.

"This independent CSI assessment proves that our new and innovative LNG-fueled vessels will help us to provide our customers with the eco-friendliest and the most sustainable transportation option in the markets," summarizes Mikki Koskinen, managing director of ESL Shipping.

CSI's environmental impact assessment is a very comprehensive process, taking into account emissions into the air and sea from vessels. The assessment covers direct exhaust emissions, chemicals used and on-board water and waste management.

The environmental footprint of these vessels is reduced by many innovative

**MORE THAN 50%  
FEWER CARBON DIOXIDE  
EMISSIONS**

solutions that aim to minimize emissions and energy consumption. The use of liquefied natural gas and powerful engines significantly reduces emissions into the atmosphere. The advanced ballast treatment system and the recovery system for water used to wash the cargo space minimize emissions into the sea.

Viikki and Haaga are the eco-friendliest dry bulk cargo vessels in the world, and they already meet environmental requirements set for 2025. Delivered in 2018, the vessels produce more than 50% fewer carbon dioxide emissions and 98% fewer particulate emissions than the previous generation of vessels in the same size category.

## SOCIAL RESPONSIBILITY

# PROMOTING A RESPONSIBLE AND ETHICAL BUSINESS MODEL

**Aspo's Code of Conduct and HR management and development principles guide the Group's operations as a responsible employer. Aspo respects the freedom of association of employees and complies with local laws in each operating country. In emerging markets, Aspo aims to lead the way and spread responsible operating methods.**

The most significant social risks are associated with occupational safety and health, and the availability and commitment of the personnel. In the conglomerate, work environments range from cargo vessels to chemical warehouses, and specific focus is placed on safety guidelines and training in different businesses. The goal is that there are zero occupational accidents.

The Finnish Transport and Communications Agency (Traficom) and classification society DNV GL have audited and certified ESL Shipping's functions and vessels in accordance with the International Safety Management (ISM) Code of the International Maritime Organization (IMO). In addition to safe operations aboard ships, the ISM Code sets standards for the prevention of emissions.

During the year, ESL Shipping discovered four incidents (four incidents in 2018) where the shipping company's substance abuse policy was violated. None of these incidents endangered maritime safety, and the company reacted to these violations by taking appropriate action as required by the company's safety policy and collective agreements. Two of the employees guilty of violations are no longer employed by the company. To ensure safety, ESL Shipping monitors any substance abuse by its employees through unannounced control tests. In 2019, these tests showed no violations.

**IN EMERGING MARKETS,  
ASPO AIMS TO LEAD THE  
WAY IN RESPONSIBILITY**

The engagement of employees and wellbeing at work comprise one of the most significant areas of responsibility in Aspo Group. For example, Aspo aims to contribute to this by providing opportunities for professional development for its employees at all levels of the organization, building an encouraging atmosphere and attending to wellbeing at work. Aspo regularly assesses the satisfaction of employees with their own tasks, the quality of management, and Aspo as an employer by conducting an annual atmosphere survey. In 2019, overall job satisfaction remained high, with the satisfaction of employees with their own work increasing to 4.27 (4.22) on a scale of 1 to 5. Long careers are also an indication of engagement and wellbeing: some 30% of all employees have worked in Aspo Group for more than ten years, and the average length of career was 7.3 (7.0) years in 2019.

The purpose of occupational safety and health is to maintain the physical and psychological working ability of the personnel and thus their high quality of life. In Finland, occupational safety and health matters are handled at a Group level by the occupational safety and health committee. The committee had two meetings in 2019 (two meetings in 2018). In addition, meetings were held in different work locations. Each ESL Shipping vessel has an occupational safety and health committee which covers the entire crew and meets four times a year. A significant part of annual training is held by each business in accordance with their own special needs.

In 2019, ESL Shipping had 326 (332) training days. The shipping company also plays a key role in Finnish maritime training. Dozens of future seamen train aboard ESL Shipping's vessels every year. In 2019, 110 (90) students completed their study-related training periods aboard ESL Shipping's vessels, totaling 3,618 training days.

As Leipurin operates in the food industry, counterfeit food, products of poor quality and health hazards directed at consumers such as allergen contaminations, pose significant risks, which the company controls using stabilized processes and practices. In 2019, Leipurin conducted an extensive

risk assessment regarding counterfeit products, and its results will be entered in the company's integrated management systems and processes during 2020. Leipurin also closely monitors whether raw material batches sent from risk countries defined by the Business Social Compliance Initiative (BSCI) are clean and genuine.

Leipurin assesses risks associated with product safety using a regularly updated risk analysis. Customers, food authorities and external auditors audit Leipurin's operations several times a year. In Finland, Leipurin uses an ISO 9001:2015-certified quality management system for change and risk management, and the continuous improvement of operations. The goal is to certify quality management systems in all countries and all operating units. Alongside the current system, Leipurin has also proactively developed its operations toward the level required by the BRC Global Standard for Food Safety. The aim is to fulfill the requirements of the standard within two years.

Product safety is also essential for Telko which acts as a link between industrial customers and international raw material manufacturers. Non-conformities in quality and deliveries of incorrect products may have severe consequences. Telko has systematized and boosted its reporting process for non-conformities in quality. Currently, even the smallest non-conformities are registered in all the company's operating countries. During 2019, Telko had six cases in which incorrect products were delivered to customers. None of these cases led to an accident or near-miss incident, as the errors were discovered and corrective measures were taken in time.

Aspo also has a broad impact on the communities in which it operates. For example, ESL Shipping is a significant organizer of maritime transport and plays a key role in Finland's emergency supply, because maritime transport accounts for 80% of Finland's imports and 90% of its exports. In the event of a crisis, vessels operating under the Finnish flag safeguard connections to other countries. Kauko is involved in digitalizing the work of public authorities and improving efficiency in key sectors such as rail, road and air traffic, health-care, and waste management.



## SUSTAINABILITY AUDITS PROVIDE INFORMATION ABOUT SUPPLY CHAINS

Telko started to plan a pilot project for sustainability audits in 2018, and the first on-site audits were conducted in Russia and China in early 2019. These audits were based on a frame of reference built with an external consulting company, based on Telko's Code of Conduct for suppliers.

During the audits, Telko's representatives and external consultants interviewed representatives of suppliers regarding sustainability and responsibility, and discussed Telko's requirements for human rights, environmental responsibility and safety guidelines, for example. Facilities and production plants were also audited.

Telko has hundreds of suppliers all over the world. In addition to on-site sustainability audits, a larger group of suppliers is monitored through self-assessments. A self-assessment questionnaire was sent to Telko's 100 largest suppliers in November. Its results provide the company with valuable information about the supplier network, and enable resources to be allocated better and the audit process to be fine-tuned. The same questionnaire will also be used to assess the sustainability and responsibility of potential suppliers. These assessments also act as selection criteria, with the aim of securing sustainable operations throughout Telko's value chain.

"Audits and self-assessments give us an even better understanding of the current situation, and what we can reasonably demand from our suppliers in each area. It is obvious that we can lead the way in terms of sustainability in certain markets, and we're working hard to this end," says Pii Appelqvist, HSEQ manager at Telko.

## HUMAN RIGHTS

# WE TAKE CARE OF OUR PERSONNEL

Aspo is committed to respecting internationally accepted human rights as defined in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

Aspo treats its employees in a just and equal manner in all countries where it operates. The applicable local legislation and regulations are complied with in all contracts of employment. These concern, among other things, working hours, remuneration, development opportunities, human rights and working conditions.

Aspo's Code of Conduct defines a common set of rules for the Group's entire personnel. We reject any discrimination based on education, competence, position, personality, way of life, work experience, ethnic origin, religion, gender, sexual orientation, age, nationality, abilities or other qualities.

Aspo uses a whistleblowing channel for reporting any human rights violations. Employees are notified of the whistleblowing channel, for example, in conjunction with Code of Conduct training. As part of the annual atmosphere survey, Aspo aims to identify whether its personnel are aware of the channel. In the 2019 survey, 97% (92%) of respondents said they are aware of the internal whistleblowing procedure in the case of any violations. Awareness of the whistleblowing channel has continued to increase, and Aspo's goal is that all personnel are aware of the channel and motivated to use it. Matters reported through

the whistleblowing channel are received by the Group's Legal Counsel and discussed by Aspo's Board of Directors. In 2019, a suspicion of abuse in Telko's Chinese country organization was raised, and the investigation is still ongoing. There have also been cases reported through the whistleblowing channel that are not directly related to violations but more about suggested development of processes.

The Group's atmosphere survey also always examines the fulfillment of equality. In this year's survey, employees once again considered the level of equality to be high: the score given to the question "Are men and women treated equally?" was 4.57 on a scale of 1 to 5. In 2018, the corresponding figure was 4.39.

Aspo's internal processes and regulations aim to prevent the use of child labor, forced labor or bonded labor in the Group's business operations. In examining the Group's entire supply chain more broadly, Aspo has identified potential risks associated with human rights violations, such as violations related to trading in conflict minerals. Criteria applied to the selection of new partners also focus on the environment, social responsibility, and the prevention of corruption and bribery.

To ensure appropriate operating methods, Aspo's businesses monitor compliance with the Supplier Code of Conduct in various ways. For example, Telko started sustainability audits in the facilities of its suppliers in 2019 and continued to audit the warehouses it uses in different countries. These audits also cover Telko's requirements concerning human rights. In addition to on-site audits, a larger group of suppliers is monitored through self-assessment.

Significant numbers of the partners of ESL Shipping, Telko and Kauko are important international companies, with which each of these businesses have been engaged in long-term cooperation and which have their own stabilized processes for the responsible management of supply chains. Leipurin also has a broad network of smaller partners, and the company is currently developing processes to monitor these partners more effectively.

**97%** OF THE PERSONNEL ARE AWARE OF THE WHISTLE-BLOWING PROCEDURE IN THE EVENT OF ANY VIOLATIONS

## ANTI-CORRUPTION AND ANTI-BRIBERY MEASURES

# MANAGEMENT OF THE SUPPLY CHAIN IS KEY

**As an international company, Aspo also operates in countries in which corruption is common. According to Transparency International, these include Russia and Ukraine. To prevent any misconduct, the use of cash has been minimized in Aspo's businesses. Aspo's Internal Audit and Legal Affairs conduct audits within all businesses in accordance with annual plans.**

Aspo's Code of Conduct absolutely prohibits corruption and bribery in all their forms. Code of Conduct training includes anti-corruption issues and provides guidance for identifying any suspicious situations and practices considered unethical. Telko also uses more detailed guidelines for bribery, and it complies with the FECC's Code of Conduct.

The key tool in the prevention of corruption and bribery is the responsible management of the supply chain. To ensure appropriate operating methods, Aspo has prepared the Supplier Code of Conduct, compliance with which is monitored in all businesses. For example, Telko conducts separate sustainability audits.

During 2019, compliance manuals were written for all businesses. The aim was to develop business processes, internal guidelines, and documentation and reporting. Alongside the manuals, training was provided for key employees, and a separate online compliance course was built for the Group's entire personnel, specifying business-specific key areas and themes in more detail. The online course is mandatory for all Aspo Group employees.

In addition, Telko and ESL Shipping apply risk assessments to their suppliers. Leipurin's objective is, through its new quality management system, to further clarify its supplier criteria related to anti-corruption and anti-bribery.

The investigation of a suspected fraud uncovered in 2018 continued in 2019. As a result of the investigation, Telko discontinued its cooperation with a Latvian supplier. In 2019, a case of potential misconduct related to the freight rates of one of Telko's logistics providers in Lithuania was discovered. This investigation is still ongoing.



## GUIDELINES FOR RESPONSIBLE BUSINESS

Compliance often means the observance of requirements, laws, rules and regulations. At Aspo, compliance means ensuring that we act in accordance with requirements that are derived from laws and regulations, our compliance manual, our internal guidelines, Aspo's Code of Conduct and the UN Global Compact principles.

Aspo Group started to develop its compliance program in 2019. The purpose was to develop business processes, internal guidelines, as well as documentation and reporting. The ultimate goal was to raise the bar in compliance-related matters.

"The purpose of the compliance program is to ensure that we always abide by laws, the company's principles and operating models, and the Group's values. As a result, we can reduce business risks, protect Aspo's reputation and meet our stakeholders' expectations. Everything revolves around responsible and ethical operations," says Toni Santalahti, director of legal affairs and compliance officer at Aspo Group.

The implementation of the program made good progress during the year. First, compliance officers and other key employees were appointed in each subsidiary. Next, every business distributed the program to all their locations. The purpose of the online training course, mandatory for all employees, is to communicate the importance of compliance in day-to-day activities and teach employees what to do in different situations by use of examples. It is also important to show how and where the personnel can report any suspected violations.

"Our compliance manuals and our Code of Conduct give us guidelines for working ethically and responsibly," Santalahti says in summary.

# SUSTAINABILITY TABLES

The reporting period is the calendar year 2019. In principle, the reporting covers the entire Aspo Group. Any exceptions have been stated in conjunction with the indicators.

The personnel figures given in the responsibility report include all permanent employees, including long-term absentees. The personnel figures also include the temporary maritime crew of AtoB@C Shipping, acquired by ESL Shipping in autumn 2018,

but only with regard to vessels owned by the company. In the financial statements, the personnel figures only include Aspo Group's own employees, not temporary workers. Additionally, the personnel figures only include active employees.

## ■ NUMBER OF PERSONNEL BY GEOGRAPHICAL AREA, DECEMBER 31

	ESL Shipping <sup>1</sup>			Leipurin			Telko		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Finland	<b>262</b>	262	236	<b>80</b>	100	108	<b>52</b>	50	64
Skandinavia	<b>74</b>	69	-	-	-	-	<b>24</b>	27	23
Baltic countries	-	-	-	<b>50</b>	49	50	<b>36</b>	33	31
Russia, other CIS countries and Ukraine	-	-	-	<b>167</b>	171	212	<b>162</b>	161	169
Other countries	<b>1</b>	1	-	-	10	14	<b>25</b>	25	32

	Kauko			Other operations			Total		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Finland	<b>30</b>	33	47	<b>27</b>	25	26	<b>451</b>	470	481
Skandinavia	-	-	-	-	-	-	<b>98</b>	96	23
Baltic countries	-	-	-	-	-	-	<b>86</b>	82	81
Russia, other CIS countries and Ukraine	-	-	-	-	-	-	<b>329</b>	332	381
Other countries	<b>1</b>	1	13	-	-	-	<b>27</b>	37	59

<sup>1</sup> Includes crew members of vessels owned by AtoB@C, acquired by ESL Shipping in autumn 2018.

## NUMBER OF PERSONNEL BY CATEGORY, DECEMBER 31

	ESL Shipping <sup>1</sup>			Leipurin			Telko		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Office staff	38	35	21	206	211	272	250	250	256
Supervisors	3	-	3	40	38	20	19	17	18
Management	7	8	3	19	20	26	24	20	25
Non-office staff	2	3	6	32	61	66	6	9	20

	Kauko			Other operations			Total		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Office staff	22	24	47	22	19	19	538	539	615
Supervisors	1	5	3	2	3	2	65	63	46
Management	3	-	4	3	3	4	56	51	62
Non-office staff	5	5	6	-	-	1	45	78	99

<sup>1</sup> Not including marine personnel.

## NUMBER OF PERSONNEL BY CONTRACT TYPE, DECEMBER 31

	ESL Shipping			Leipurin			Telko		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Amount of personnel	337	332	236	297	330	384	299	296	319
Full-time contract	50 <sup>1</sup>	45 <sup>1</sup>	33 <sup>1</sup>	293	316	364	293	290	313
Part-time contract	- <sup>1</sup>	1 <sup>1</sup>	- <sup>1</sup>	4	14	20	6	6	6

	Kauko			Other operations			Total		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Amount of personnel	31	34	60	27	25	26	991	1 017	1 025
Full-time contract	31	34	60	26	22	23	643 <sup>1</sup>	707 <sup>1</sup>	793 <sup>1</sup>
Part-time contract	-	-	-	1	3	3	11 <sup>1</sup>	24 <sup>1</sup>	24 <sup>1</sup>

<sup>1</sup> Not including marine personnel.

## GENDER DISTRIBUTION, DECEMBER 31

	ESL Shipping			Leipurin			Telko			Kauko		
	2019	2018	2017	2019	2018	2017	2019	2018	2017	2019	2018	2017
Women	36	35	21	166	198	228	164	160	162	5	7	14
Men	301	297	215	131	132	156	135	136	157	26	27	46

	Other operations			The Boards of Aspo and segments			Total		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Women	16	14	13	7	5	8	394	419	446
Men	11	11	13	9	10	11	613	613	598

## AGE DISTRIBUTION, DECEMBER 31

	ESL Shipping			Leipurin			Telko		
	2019	2018 <sup>2</sup>	2017	2019	2018	2017	2019	2018	2017
> 24	12	9	15	3	17	20	8	6	9
25-39	119	103	82	129	154	173	140	137	157
40-54	127	107	96	132	126	141	117	119	123
55 <	79	56	43	33	33	50	34	34	30

	Kauko			Other operations			Total		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
> 24	-	1	2	1	-	-	24	33	46
25-39	6	6	13	6	6	6	400	406	431
40-54	16	19	35	10	10	10	402	381	405
55 <	9	8	10	10	9	10	165	140	143

## AVERAGE AGE OF EMPLOYEES

	ESL Shipping		Leipurin		Telko		Kauko		Other operations	
	2019	2018	2019	2018	2019	2018	2019	2018	2019	2018
Average age of employees	45	44	41	39	41	40	47	48	47	47

## EMPLOYEE TURNOVER RATE

	ESL Shipping <sup>1</sup>			Leipurin			Telko		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Average turnover rate, %	16	16	15	26	26	18	20	14	13

	Kauko			Other operations			Aspo Group		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Average turnover rate, %	31	41	16	39	18	8	23	21	15

<sup>1</sup> Not including marine personnel.

## EMPLOYEE SATISFACTION INDEX (SCALE 1-5)

	2019	2018	2017
Business segment	3.94	4.18	4.13
Own unit	4.08	4.24	4.25
My work	4.27	4.22	4.21
My superior	4.1	4.16	4.11

## LTIF AND SICK LEAVES

	ESL Shipping Office			ESL Shipping Marine personnel			ESL Shipping AtoB@C Marine personnel <sup>4</sup>	
	2019	2018	2017	2019	2018	2017	2019	2018
LTIF <sup>1</sup>	0	0	0	22.1	21.1	8.9	0	0
Sick leaves, % <sup>2</sup>	1.39	0.48	0.94	4.0	3.9	2.97	0	- <sup>5</sup>

	Leipurin			Telko			Kauko			Other operations		
	2019	2018	2017	2019	2018	2017	2019	2018	2017	2019	2018	2017
LTIF <sup>1</sup>	8	10	48	4	41	13	0	0	14	0	0	29
Sick leaves, % <sup>2</sup>	3.99	1.69	1.85	1.44	1.05	1.4	0.32	1.56	0.86	1.61	0.69	1.09

<sup>1</sup> Lost-time injury frequency (LTIF) is presented per 1,000,000 working hours. LTIF-rate includes only Finnish personnel. The LTIF-rate is significantly affected by even small changes in the number of incidents: one incident more or less during the reporting year, in comparison to the baseline year, will have a major impact on the LTIF-rate. Particularly for the smaller businesses the fluctuation of the LTIF-rate can partially be explained by the small number of employees.

<sup>2</sup> Sick-leave absence ratio is calculated: (sick days/total work days)\*100. Sick-leave absence ratio of marine personnel is calculated: (total sick days in the fleet/total days worked onboard)\*100.

<sup>3</sup> TIR (Total Incident Rate) includes all incidents; the ratio is presented per 1,000,000 working hours.

<sup>4</sup> AtoB@C Shipping marine figures included in reporting from 2018.

<sup>5</sup> Information on sick leave is not available for AtoB@C Shipping marine personnel for the year 2018.

## THE USE OF ENERGY AND EMISSIONS

	ESL Shipping <sup>2</sup>			
	2019	2018 <sup>3</sup>	2017	Change <sup>5</sup> , %
Purchased energy <sup>1</sup> , Mwh	117.6	105.2	129.7	11.7
Total use of fuel, Mwh	892,250	597,300	347,830	49.4
tCO <sub>2</sub> <sup>2</sup>	237,296	160,988	93,224	47.4
g-CO <sub>2</sub> per ton mile <sup>3</sup>	15.47	13.10	10.75	18.1
tSO <sub>x</sub> <sup>2</sup>	179.3	128.9	95.3	39.1
mg-SO <sub>x</sub> per ton mile <sup>3</sup>	11.69	10.49	10.99	11.4

	Leipurin				Telko <sup>4</sup>			
	2019	2018	2017	Change <sup>5</sup> , %	2019	2018	2017	Change <sup>5</sup> , %
Purchased energy <sup>1</sup> , Mwh	3,394.8	4,240.6	3,429.0	-19.9	1,093.0	1,059.5	1,118.7	3.2
tCO <sub>2</sub> <sup>2</sup>	1,154.2	1,441.0	1,374.0	-19.9	306.9	337.2	428	-9.0

	Kauko				Other operations			
	2019	2018	2017	Change <sup>5</sup> , %	2019	2018	2017	Change <sup>5</sup> , %
Purchased energy <sup>1</sup> , Mwh	146.5	125.0	144.9	17.2	150.3	177.1	210.9	-15.1
tCO <sub>2</sub> <sup>2</sup>	24.7	23.0	29.5	7.3	23.7	25.6	32.7	-7.4

<sup>1</sup> Purchased energy mainly measured, if not possible to measure the figures are estimated.

<sup>2</sup> Excluding Raahe depot and certain vessels on voyage charter.

<sup>3</sup> Figures corrected retrospectively for 2018 and 2017.

<sup>4</sup> The figures cover Telko's main countries of operation Finland, Poland, Russia, Ukraine, Sweden and Denmark.

<sup>5</sup> Change 2018–2019.