



Code of conduct

GIRTEKA GROUP

2025



Table of contents

1. CEO foreword	3	5. Responsible to customers	19
2. Introduction	4	5.1 Our services	20
2.1 Compliance with regulation	6	5.2 Supply chain security	21
2.2 Speak up	7	5.3 Information security, data privacy and protection	21
2.3 Whistle blower	8	5.4 Corruption and bribery	22
3. Who we are	9	5.4.1 Bribery	22
3.1 Our purpose	10	5.4.2 Kickbacks	22
3.2 Our mission	10	5.4.3 Facilitation Payments	22
3.3 Our values	11	5.4.4 Money Laundering	22
4. Responsible to colleagues	13	5.5 Gifts and hospitality	23
4.1 Working conditions	14	5.5.1 No Gift Policy	23
4.2 Health and safety	14	5.6 Donations to Charity	23
4.3 Behaviour	15	5.7 Business Continuity Plan (BCP)	24
4.4 Diversity, Equity, and Inclusion (DEI)	15	6. Responsible to communities	25
4.5 Conflict of interests	16	6.1 Environment	26
4.6 Suppliers and Customers	17	6.2 Community engagement	27
4.7 Employment of Related Parties	17	6.3 Communications practices	28
4.8 Monetary Loans to Employees	17		
4.9 Data privacy	18		

1. CEO foreword

As we navigate the complexities of the European road freight market, characterized by economic uncertainties and regulatory changes, Girteka Group remains steadfast in our commitment to excellence and integrity. The long-anticipated regulatory changes, such as the implementation of CO2-based tolling across multiple European countries, technological advancements, fluctuating fuel prices, and the persistent shortage of skilled truck drivers, underscore the dynamic and challenging environment in which we operate. This is our current reality.

Our Code of Conduct serves as a beacon, guiding our actions and decisions, no matter the time or situation. It is a testament to our values, defining what is right and wrong and setting clear expectations for our behavior. We are committed to being a trusted partner for our customers, acting with integrity and respect when interacting with regulators, stakeholders, and each other. By adhering to the principles outlined in this Code, we collectively build a Girteka that we are proud to work for and represent.

Our diverse workforce, encompassing many nationalities and varied backgrounds, brings a wealth of experiences and

perspectives. This diversity strengthens us, fostering innovation and adaptability in our ever-evolving industry. It is crucial that every Girteka employee and entity comply with all applicable laws, regulations, and contractual obligations in every country where we operate. Our reputation and business depend on this unwavering commitment to compliance.

We integrate the Ten Principles of the UN Global Compact into our strategies, policies, and procedures, ensuring a balanced approach to environmental, social, and governance factors. This holistic perspective enables us to achieve sustainable growth and make a positive impact on the communities we serve.

Our customer-centric approach is at the heart of our operations. By being flexible,

entrepreneurial, and agile, we adapt to the needs of our customers and the demands of the market. We prioritize transparency, providing clear direction on how we conduct our business and ensuring compliance with all regulatory requirements. This dedication to openness and accountability reinforces the trust our customers place in us.

Together, as One Girteka, we embrace the challenges and opportunities that lie ahead. By adhering to our Code of Conduct, we uphold our values, support each other, and strive for excellence in everything we do.

Let us all commit to these principles and work together to build One Girteka that stands as a beacon of trust, integrity, and excellence in the logistics industry.



Edvardas Liachovičius,
CEO Girteka Group

2. Introduction

Our Code of Conduct

We care deeply about doing the right thing. We share a commitment to operating with the highest ethical standards and making a positive difference in everything we do.

Girteka's Code of Conduct serves as a framework to clarify the guidelines our employees must follow and serves as an ethical compass for our behaviour.

The Code of Conduct provides a concise overview of the principles that define our company's corporate values, serving as a tool to help guide the actions of all our employees, their behaviour towards each other and compliance of groups policies.

Given that the Code of Conduct sets out the general terms, it will not provide an answer on how to act in every situation.

Each employee therefore needs to take it upon themselves to look for detailed principles and further guidance.

We each have a personal responsibility to act ethically and comply with the law, the Code of Conduct and Girteka Group policies and procedures at all times. We should all take responsibility for understanding, prioritising, and delivering on what is expected of our role within the company and whilst working with other stakeholders.

We believe in solving problems and raising awareness through open and honest discussions. However, violations of the Code of Conduct, laws and external and internal rules and regulations could result in employment law measures up to and including termination of employment as well as other actions because of a breach and misconduct.



2.1 Compliance with regulation

Integrity and responsibility guide everything we do. Compliance with laws and regulations is not just a legal obligation — it is a commitment to ethical conduct and a promise to our customers, partners, and communities that we operate transparently and responsibly. By following these guidelines, we ensure our actions align with the highest standards of fairness, safety, and accountability, maintaining the trust and confidence of all those we serve.

Human rights

The Girteka Group fully supports and will always work to comply with human rights and labour laws. Girteka is committed to the fight against and does not tolerate any practices of human trafficking, forced labour or debt servitude across our supply chains and in any other part of our business.

It is our policy that all people who carry out work and services for Girteka Group, whether directly as Girteka employees or indirectly as employees of our suppliers, must be treated with dignity and shown the highest respect for their fundamental rights.

The Girteka Group Code of Conduct endorses the Charter of the United Nations Universal Declaration of Human Rights, the ILO Declaration and Fundamental Principles of Rights at Work, the Ten Principles of the UN Global Compact, and the International Bill of Human Rights. We, as a company, our employees and the Board of Directors have a duty to comply with these.



2.2 Speak up

We have fostered an inclusive workplace where we encourage employees to act ethically, take responsibility and when necessary, voice genuine concerns and speak up against alleged irregularities and violations of the Code of Conduct, laws and external and internal rules and regulations.

Each employee is encouraged to contribute to maintaining safety at work and the creation of a safe environment for their colleagues, by complying with all safety regulations and exercising care to prevent accidents.

It is important then that any risks and irregularities are detected and addressed as soon as possible. Girteka operates a no blame safety culture where employees are encouraged to speak openly about problems and the obstacles to progress.

To continually improve our workplace which is an ongoing focus, we are open for employees to make suggestions or proposals on how to enhance our way of work, how we conduct certain activities, as well as how to make better the interaction with colleagues.

An employee can bring any issue to the attention of an immediate manager or senior management or, alternatively, submit a message through the Girteka Whistle blower Programme. In addition, we have an annual employee survey called the “Speak Up Survey” where we analyse and assess the anonymous feedback from employees regarding the work environment.



2.3 Whistle blower

There are many ways to raise a concern within the Girteka Group, for example directly with a manager or if needed, it is possible to escalate a concern without fear of retaliation if an employee believes the initial response from the first point of contact was not acceptable.

We strive to maintain a transparent business climate along with high business ethics. We value the safety and respect of everyone affected by our business, and if an employee feels they cannot be open with information, we offer the option of reporting a concern anonymously.

Whistleblowing provides an opportunity to report suspicions of misconduct; anything that is not in line with our values and policies. The service is handled by our partner WhistleB, Whistleblowing

Centre and as a communication channel it is encrypted and password-protected, allowing a message to be submitted in an anonymised manner outside the regular reporting lines.

All messages are handled with care and integrity and the process ensures that the person is protected from any negative impact, for example retaliation, discrimination, or other types of unfair treatment. Additional information including a link to the whistleblowing website can be found on the Girteka Group website.



3. Who we are

3.1 Our purpose

Girteka is to become the transportation services provider of choice for temperature controlled and/or high care cargo in Europe.

We want to be the No. 1 transportation services provider in the key industry segments we serve, and amongst the largest overall logistics providers in Europe, with dedicated services for pharma, food & beverages, and high value cargo industries, as well as dedicated fresh foods brand including specialisation in seafood logistics.

We want to provide our services using the most modern fleet in the market.

3.2 Our mission

We ensure that products essential for life reach customers across Europe on time, in full and the right condition all year round.



3.3 Our values



Be open & respectful

We pride ourselves on encouraging our employees to be open to different views, striving to be respectful in all their interactions and actively listening to colleagues. Respect is shown when recognising that everyone is equal regardless of nationality, race, disability, gender identity, gender expression, sexual orientation, religious beliefs, political orientation, ethnic or social background, experience, or position held.

To support our employees, we actively provide constructive feedback, and assistance. It is important for us as a company that employees should feel comfortable asking for help when needed and are encouraged to give feedback to their colleagues, be transparent and help each other out.



Create the best customer experience

Our employees are focused on providing a high-quality client experience, creating added value for clients while ensuring profitable growth for the organisation. This begins by learning how to step into our clients' shoes, getting to know them, and understanding their challenges. The Girteka Group has a commitment to building balanced, long-lasting partnerships through dialogue and collaboration with our customers. This is reflected in our customer-centric day-to-day operations as well as strategic initiatives.

To deliver effective solutions in a timely manner, employees need to excel in their role, and with the support of colleagues work together on providing the best possible client service.



Foster team spirit

Employees are encouraged to treat their colleagues the way they would like to be treated, as we can only truly achieve the best results when we work together. Being part of a driven team, everyone contributes to fostering a friendly, open, and collaborative atmosphere.

Working together and valuing each other's perspectives ensures the success of the team and the company, as the best results are achieved through collaboration and treating colleagues with honesty, trust, and respect.



Take ownership

Employees are encouraged to act as if the company's assets were their own. With the necessary level of independence and empowerment, taking ownership promotes accountability for everyday actions.

And before making promises, employees do also consider their ability to deliver, taking into account that if they notice something is wrong, they need to address it. This approach ensures a high level of responsibility and commitment to the company's values and objectives.



Strive for continuous improvement

Focusing on both personal and professional growth, employees constantly challenge themselves to achieve better results in a more effective and measurable way. Process improvement is a key area of focus, with employees seeking out-of-the-box, innovative solutions to provide exceptional service to our customers and ensure ongoing on-the-job development and excellence.

4. Responsible to colleagues

4.1 Working conditions

The occupational health, safety and well-being of our employees is our overriding priority. It is imperative that we ensure a healthy physical and psychological working environment for our employees in each of their workplaces, both in the office and on the road, continuously reviewing and improving the measures in place.

Each employee should contribute to upkeeping the safety at work and the creation of a safe working environment for their colleagues, through compliance with all safety regulations and exercising care to prevent accidents.

We comply with current national legislation and agreed standards for employee working hours, wages, and environments. Obligations to employees under international conventions, national law and regulations concerning regular employment are not avoided though the use of short-term contracting (such as contract labour, casual labour, or day labour), sub-contractors or other labour relationships.

4.2 Health and safety

Safety is not merely a priority – it's a core value ingrained in our culture. We are dedicated to fostering a healthy workplace, physically and mentally, in the office and on the road. Our commitment to safety goes beyond mere monitoring; we adopt a proactive approach to ensure the well-being of all individuals involved in our operations.

We are committed to creating an accessible occupational health and safety management system that minimises or eliminates the risk of injury or illness. Central to this commitment is the development and maintenance of a behaviour-based safety policy, which encourages all personnel to identify with and manage occupational health and safety risks proactively.

Girteka continually improves its occupational health and safety management system by setting and monitoring measurable objectives and targets aimed at eliminating work-related illnesses and injuries.

Responsibilities, authority to act, and reporting requirements are clearly documented and communicated to personnel at all levels within the workplace. Additionally, the company is dedicated to meeting legislative obligations to the highest possible standards through comprehensive occupational health and safety training, and engaging staff in consultation processes to promote a culture of safety awareness.

Hazards, incidents, and injuries are promptly reported, investigated where appropriate, and control measures are implemented to eliminate or minimise the risk of recurrence.

Girteka maintains a zero-tolerance policy towards alcohol and substance abuse in the workplace, ensuring a safe and healthy working environment for all.

4.3 Behaviour

Our Code of Conduct sets out what behaviour is expected of the Girteka Group and its employees, business partners, and customers.

Employees are expected to loyally support the Girteka Group business strategy and corporate values and to consider the impact their actions have on the brand and avoid any damaging or derogatory communications, whether online or elsewhere.

Girteka actively encourages the use of social media and other online platforms for business communication and networking purposes. When interacting on personal social media platforms, such as LinkedIn, Facebook, etc., employees must consider the content of their posts as public and avoid disclosing confidential information and ensure that they reflect personal views and not those of the Girteka Group.

4.4 Diversity, Equality, and Inclusion (DEI)

We encourage a team spirit, building trust between employees and management, and actively shows commitment to diversity and inclusion, which means that



every employee, within their own abilities, qualifications, and life experiences, is an equal part within the workplace.

The diversity of our employees contributes to the success of our company. We actively promote a work environment that values equality, diversity, and inclusion where all employees feel equally accepted.

4.5 Conflict of interests

Girteka Group employees must avoid situations where their personal interests' conflict, or appear to conflict, with the interests of Girteka. A conflict of interest is when an employee's obligations and interests when acting on behalf of Girteka Group conflict with their personal interests.

It's important that employees conduct business activities in the best interest of Girteka Group. It is the responsibility of every employee to exercise personal judgement regarding conflicts of interest in compliance with internal rules of prevention of conflict of interest and to seek advice from their immediate manager or senior management when in doubt.

Employees should not unduly use their position at Girteka for personal benefit or to benefit relatives or close associates. It's important therefore that every employee exercises personal judgement regarding conflicts of interest in compliance with internal rules of prevention and to seek advice from their immediate manager or senior management when in doubt.

Perception matters, so Girteka employees must not only avoid actual conflicts of interest, but also situations where an external party might assume a conflict of interest situation that the employee might not intend or be aware of.

Therefore, employees should not take part in, appear to take part in or exert influence on any decision that may put personal interest in conflict with the best interest of Girteka.





4.6 Suppliers and Customers

Employees must not participate in any commercial transactions between a Girteka Group company and a supplier or customer in which they may have a direct or indirect personal interests, financial or otherwise.

The transactions must be approved in advance by senior management of the relevant Girteka Group company. This is applicable to transactions between a Girteka Group companies and all natural and legal persons that are related parties to senior management. Examples of related parties are family members, companies of family members, own companies, other companies in which the relevant member of management has significant influence.

4.7 Employment of Related Parties

Reporting relationships, direct or indirect, are not permitted between related parties employed by Girteka Group, at any stage of employment, from the start of employment and if a relationship develops during employment.

Direct reporting relationship is between an employee and his/ her immediate manager. Indirect reporting relationship is between two employees in the same

reporting line, but with other managers in between.

In cases where there is no reporting relationship, direct or indirect, appointing or keeping related parties in the same unit needs to be thoroughly reviewed. In case you find yourself in reporting relationships during employment you should seek advice from their immediate manager or senior management.

4.8 Monetary Loans to Employees

It is forbidden to give loans to employees and to parties related to its employees. Other grounds when an employee could be found in a conflict of interest shall be provided in internal rules which have to be strictly followed.

4.9 Data privacy

To comply with data privacy legislation, Girteka has issued binding corporate rules which protect collected personal data from being copied, corrupted, misused, stolen, disclosed or accessible to persons without adequate authorisation and approval.

The protection and responsible use of personal data is reflected in our daily operations where we strive to be a respected and preferred partner to all who may provide such data. We are committed to collecting and using data in a lawful, fair, legitimate, and ethical way, and will always respect the privacy of individuals to earn and deserve their trust.

Any information related to personal data must be collected and processed in compliance with applicable data privacy laws (e.g. EU General Data Protection Regulation). Girteka Group employees with access to such personal data are expected to apply the privacy principles of lawful, fair, and transparent data processing, respecting any purpose limitations, as well as the principles of data storage limitation, usage, integrity, and confidentiality.



If there are any doubts about processing (storing, deleting, or sharing) personal data and sensitive personal data, there is an appointed Data Protection Officer who can provide advice.

5. Responsible to customers

5.1 Our services

We are a leader in temperature controlled transportation provides customer-centric solutions, offering tailored routes and services for pharma, food and beverages, high value cargo and seafood logistics across Europe.

Our extensive network spans the entire continent, connecting major European countries and ensuring seamless cross-border shipping of temperature-controlled goods. Our focus is to help organise the most optimal route for our customers fresh, frozen, or refrigerated cargo, delivering it safely and on time, every time.



5.2 Supply chain security

As a leading European transport service provider and member of the Transported Asset Protection Association (TAPA), we recognise our role in the secure transportation of high care goods across our network.

By effectively integrating into our business operations the practices of supply chain management and the security requirements for combatting threats such as terrorism, piracy, and theft, Girteka commits to ensure security through the entire supply chain.

Incident prevention remains the top priority, with safety precautions and procedures regularly checked and risk assessments made, with the aim to maintain the high operational safety standards of Girteka.

Girteka commits to providing all employees related to the transportation of high-value cargo with appropriate supply chain security training.

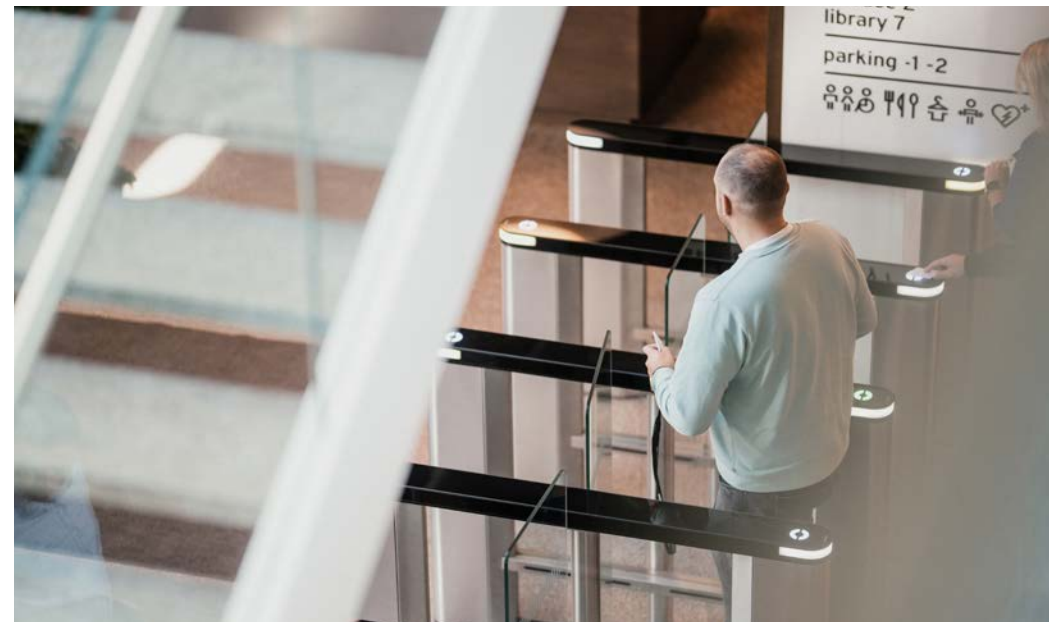
5.3 Information security, data privacy and protection

Girteka are committed to protect personal data with respect to the right to privacy of our customers, employees and other stakeholders. This constitutes an important part in Girteka's efforts to act in compliance with data privacy laws and regulations to ensure an individuals' fundamental right to protection of their personal data.

We respect and protect the confidentiality of information belonging to our customers, suppliers, other business partners and our company.

The employees of the company and/or data processors authorised by the company while performing their duties which may include the processing personal data, must ensure that personal data are processed in accordance with and comply to all the relevant principles related to the processing of personal data.

As an employee you are not allowed to disclose any confidential or proprietary information received in Girteka to anyone not employed by Girteka. This applies during employment in the company and for the period defined by the local law after leaving Girteka.



5.4 Corruption and bribery

The Girteka Group Anti-Corruption Policy is aimed at ensuring that the company's performance and behaviour complies with the highest standards of reliability, integrity, transparency, and business ethics. The aim is to make these requirements become recognised and voluntarily implemented norms of works ethics not only for the employees but also for the Group's business partners, clients and other interested (third) parties.

The policy aims to create conditions for timely identification of corruption risks and ensure proper implementation of anti-corruption measures and means of control. The anti-corruption principles do not prohibit normal and appropriate hospitality given or received, but if there is any doubt, employees can contact an immediate manager or senior management for clarification.

5.4.1 Bribery

Bribery refers to any offer, kickback or acceptance of a gift, loan, fee, remuneration or anything of value to or from another person or entity as an incentive to influence or promote a certain act or omission which would not have been appropriate in the absence of the bribery.

The prohibition of bribery extends beyond monetary transfers and includes the transfer of any kind of assets. Consequently, the prohibition covers bribery in the form of payment of travel expenses; disproportionate entertainment expenses; charitable donations; delivery of products or services; transfer of financial or other personal benefits.

Girteka does not tolerate any form of bribery, without exception, including in countries where bribery is legal or where it is accepted as normal business practice. Employees must not accept or offer a bribe of any kind.

5.4.2 Kickbacks

Kickbacks are considered as a form of bribery, so all prohibitions towards bribery apply for kickbacks as well. Employees must not accept or offer a kickback. Girteka Group operates using rules to address anti-corruption. The principles do not prohibit normal and appropriate hospitality given or received

5.4.3 Facilitation Payments

Facilitation payments are often small payments made to lower-level public officials to ensure their performance or to speed up a government or official process, which the employee is already duty-bound to perform. Employees must not make facilitation payments or accept such practice in any country by any parties, including third parties acting on behalf of Girteka Group, even if they are a part of local law or local custom.

5.4.4 Money Laundering

Money laundering is the act of concealing or disguising money obtained from criminal activities and making them appear to have originated from legitimate sources or constitute legitimate assets. Employees must not engage in money laundering, funding of terrorism, funding of other criminal activities or be involved in any other activities that facilitate money laundering.

5.5 Gifts and hospitality

The Girteka Group is committed to establish an ethical work environment for the entire company, and the No Gift Policy underpins the standards of conduct expected from all the Girteka Group, its employees, and their family members.

5.5.1 No Gift Policy

Although gifts may be well intended, it can potentially pose as a conflict of interest or might be seen as act of corruption. While entertainment, hospitality and the exchange of business gifts are considered common practice and part of building and maintaining business relationships throughout the world, this should be limited to the absolute minimum.

The No Gift Policy strictly prohibits all Girteka employees from giving or accepting gifts, no matter the value or the reason (except token gifts of nominal value). The No Gift Policy is in place to avoid situations which may influence the employee's judgement in a decision-making process or put the employees in a position of conflict or obligation within Girteka's interests.

Employees must not solicit, accept, or offer gifts to clients, prospective clients, business partners, government officials, suppliers or any other third parties.

An exemption to the policy are token gifts of nominal value, bearing a company's logo (such as pens and other small promotional items) that are given out to those attending events such as conferences, exhibitions, career fairs, etc, and deemed as a part of the company's brand building or promotional activities.

If an employee is offered a free dinner or asked to take part in an activity of a similar nature, this must be disclosed to the immediate manager and approval sought before accepting.

The No Gift Policy applies to all the Girteka Group, its employees, and their family members. If there is a doubt, employees must check with an immediate manager or senior management when further clarification is needed.

If there is a doubt or uncertainty whether something is a Gift, it should be assumed that it is a Gift and is subject to the No Gift Policy to avoid even the appearance of impropriety. Girteka Group employees are required to respectfully inform vendors, potential vendors, and other stakeholders of the Girteka Group's No Gift Policy.

5.6 Donations to Charity

Girteka Group recognises the importance of companies in supporting charities and local communities. Reasonable support and donations may be offered in the form of payment, services or materials and but must be approved by relevant senior management. It must be ensured that any payments to community organisations are not a form of bribery and are not used as a cover for fraud.

Contributions or sponsorships must be disclosed, be transparent and in accordance with national legislation. Such activities are acceptable and are shown in the Girteka Group CSR reports in UN Global Compact Update of Progress. While entertainment, hospitality and the exchange of business gifts are considered common practice and part of building and maintaining business relationships throughout the world, we should limit this to the absolute minimum.

5.7 Business Continuity Plan (BCP)

Our business continuity plan has two principles, to ensure as a priority internally, the protection, health, and safety of all Girteka employees during an emergency and its aftermath. And secondly, externally the recovery of infrastructure necessary for the operation of Girteka's critical functions, using a customer centric approach that provides continuity of operations for our customers.

Girteka's operations will be resumed according to the priority of business functions as determined by the Business Continuity Management Group (BCMG) following the declaration of an emergency.

To successfully deliver the BCP, the Business Safety Department undertake the responsibility to ensure employees are made familiar with the policy, the plan, and any other relevant Girteka business continuity legislation, processes, and procedures.

The Policy is an integral part of Girteka's Information Security Policy and is administered by the Information Security Manager and is regularly reviewed.



6. Responsible to communities

6.1 Environment

We are committed to creating a workplace, culture and services underpinned by sustainable principles within a clear strategy, where the protection of the environment is at the forefront of our business decisions.

We prove this commitment by working collaboratively with our stakeholders to minimise pollution, promote efficiency and the use of sustainable resources, including energy, fuel, and water, and to reduce CO2 emissions.

To ensure that Girteka Group contributes to Environmental protection, we systematically develop and continuously improve our ISO14001 certified Environmental Management System (EMS). The EMS has allowed us to identify risks and opportunities on how to improve results and conserve resources.

To the extent possible and whenever available, Girteka promotes eco-friendly practices, offering sustainable and innovative transport and logistics systems that continually reduce Girteka's, our customers' and our suppliers' environmental impact.



6.2 Community engagement

Responsibility is at the core of our values. From our customers to our colleagues, partners, and the wider community, we prioritise ethical and sustainable practices empowering colleagues to grow personally and professionally.

Girteka is aware of its ongoing accountability for the social well-being of the population it serves as customers, colleagues, partners, and the community.

As a part of the community, we focus on road safety and reducing our carbon footprint. Girteka Group also recognises the importance of companies in supporting charities and local communities. Reasonable support and donations may be in the form of payment, services or materials and must be approved by the relevant senior management.



6.3 Communications practices

We encourage its employees to participate across social media, however comments are personal and cannot be treated or presented as representing the company. Employees must also be sensitive to the Code of Conduct in all their actions.

Only the C-level executives, Corporate Communications or appointed representatives can effectively communicate with media representatives on company matters and provide them with information on the group of companies or any other company belonging to the Girteka Group.

In the case of an employee receiving a request or suspects that they are communicating with a media representative, they must immediately end the conversation and communicate that they are not authorised to provide such information to media representatives and direct a journalist to the Corporate Communications team for further comment.





Responsible Logistics

