



# GIRTEKA LOGISTICS CODE OF CONDUCT

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# INTRODUCTION FROM THE CEO

Girteka Logistics has grown to be a multinational company, with trucks driving in more than 30 countries every day. We employ people of many nationalities and of various backgrounds; we all work with people from other cultures, who have different experiences in life. The Code of Conduct sets the standard for our ethical behaviour and serves as a tool to help you understand our policies and to support our corporate values.

Girteka Logistics' reputation and business depend on our compliance with all applicable laws, rules, regulations and contractual obligations in all countries where we operate. Every Girteka Logistics company and employee must follow all relevant national and international legislations.

The Code of Conduct endorses the Fundamental Principles of Rights at Work, ILO declaration, the Ten Principles of the UN Global Compact and the International Bill of Human Rights. We, as a company, and you, as an employee, have a duty to comply with these.

You are expected to read, understand and adhere to the company's policies and procedures. The Code cannot cover every issue that may arise in our company and therefore you should always use common sense when conducting business on the behalf of Girteka Logistics. When uncertain about any public laws, policies or contractual obligations, seek advice.

Our Girteka Logistics Code of Conduct is based on our values and applies to all employees, management and the Board of Directors. I encourage you strongly to act if you are faced with or suspect non-compliance with the Code of Conduct.

You can bring any issue to the attention of your immediate manager or senior management or, alternatively, through the Girteka Logistics Whistleblower Program.



*Edvardas Liachovičius*

A handwritten signature in blue ink, which appears to be 'Edvardas Liachovičius', written in a cursive style.

# 1. CONTINUOUS IMPROVEMENT AND QUALITY MANAGEMENT POLICY

The policy is realized via integrated management system, which covers the standards of: quality, physical safety of cargo, safety of medicinal drugs and production for medical purposes, food safety, employee health and security, transportation of chemical industry goods and environmental protection.

**GOAL – Girteka Logistics continuous improvement and quality management system - comprises of four parts:**

**G – Girteka Logistics. Our Sense of Purpose and Strategy**

This part of the system is the foundation which directs the organization, revealing Our Sense of Purpose and Strategy:

- strategic plan formation and setting goals for every employee;
- goal setting methodology, cyclical review of results;
- orientating goals towards our 5 stakeholder groups: Clients, Colleagues, Our Community, Shareholders and Partners.

**O – Operate. Operational Excellence**

This part of the system is oriented to a high-quality and effective everyday task performance, raising employee qualifications, process review and standardization, and sharing

and documentation of process information. This part is formed of two main models:

- change management when installing new processes – process standardization, documentation and ensuring documentation and information flow, raising employee qualifications;
- ensuring process quality and effectiveness – system of non-conformities, process audits, CAPA methodology.

**A – Advance. The strive to implement advantageous breakthroughs**

This part of the system demonstrates how the organization implements breakthroughs. Such breakthroughs can vary – from large projects to many small KAIZENS which have a large impact. Main directions are:

- KAIZEN culture;
- understanding clients' needs and reacting to their expectations;
- quantity and value of existing projects.

**L – LEAN. Application of the system's methodology and philosophy.**

This part of the system is the methodological foundation and philosophy which we use for internal process improvement. In 2014 we decided to begin the implementation of LEAN, aiming for effective processes and minimal waste. Main directions are:

- LEAN methodology understanding and culture development in the organization;
- constant application of LEAN methods in everyday operations.



The aims of the GOAL quality management system:

- ensure employee involvement and reaching for results, based on the organization's strategic goals and Our Sense of Purpose;
- offer high-quality services which meet clients' demands;
- create additional value to clients while retaining profitable growth of the organization;
- guarantee the adhesion to the installed quality and other standards;
- raise employee qualification, professionalism, and work efficiency;
- encourage and foster the culture and quality management system to ensure a continuous organizational development;
- realize and develop operations based on LEAN philosophy and methodology, removing unnecessary wastes;
- operate with the aim to reduce CO<sub>2</sub> emissions, involve employees and partners in environmental protection initiatives.



## 2. WORKING CONDITIONS

In Girteka Logistics we strongly believe in human rights provided in the Charter of the United Nations and the Universal Declaration of Human Rights. These are fundamental and should always be protected. It is our policy that all people who carry out work and services for Girteka Logistics, whether directly as Girteka Logistics employees or indirectly as employees of our suppliers, must be treated with dignity and highest respect to their fundamental rights.



### 2.1 COMPLIANCE WITH THE UN HUMAN RIGHTS

Girteka Logistics fully supports and always works to comply with conventional human rights and labour laws.

You must recognise and support equal human rights.

You must not tolerate:

- differential treatment;
- discrimination;
- harassment;
- inappropriate or unreasonable interference with work performance.

The previous apply irrespective of whether based on nationality, race, disability or gender, including gender identity or gender expression, sexual, religious or political orientation, ethnic or social background.

Physical, sexual, mental or verbal abuse is prohibited, as are threats of abuse and any form of intimidation.

## 2.2 FIGHTING MODERN SLAVERY

Girteka Logistics is committed to the fight against and does not tolerate any practices of human trafficking, forced labour and debt servitude across our supply chains and in any other part of our business.

Forced employment and working conditions resembling servitude are prohibited.

## 2.3 CHILD LABOUR

The minimum age for workers is not less than 18 and complies with:

- the national minimum age for employment, or;
- the age of completion of compulsory education,

whichever of these is higher.

There shall not be recruitment of child labour, this is defined as any work performed by a child younger than the ages specified above.

No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.

Girteka Logistics commits to reacting instantaneously to all instances where child labour is identified, acting in the best interest of the child, by ensuring that the child is removed from their job position and is provided with sustainable alternatives for further development.

## 2.4 REGULAR EMPLOYMENT

Girteka Logistics complies 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.

The following rules always apply:

- employees have the right to join a union and to collective bargaining;
- constructive dialogue between employer and employee is fully supported;
- all workers are entitled to a contract of employment in a language they understand;
- employees must receive a letter of confirmation of their employment conditions if required by national legislation;
- employees have the right to leave Girteka Logistics, a right that is stated in the employment contract and is an integral part of the local labour code;
- the duration and content of apprenticeship programs are clearly defined;
- a record of every employee's working hours and wages is kept, ensuring compliance and transparency.

## 2.5 WAGES

The remuneration of employees, including the benefits provided, as minimum must meet national legal standards and / or industry benchmark standards, whichever is higher.

Deduction from wage as a disciplinary measure shall not be permitted.

All workers are provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

## 2.6 DRIVING TIME AND REST PERIODS FOR OUR DRIVERS

Maximum daily and fortnightly driving times, as well as daily and weekly minimum rest periods for all drivers at Girteka Logistics are regulated in accordance with the EU rules or local laws in countries where EU regulations do not apply.

Guidelines are established for how to follow these regulations, including installing a real-time telematics system which provides online access to drivers' tachographs and card data, in addition we have an increasing number of trucks with new digital tachographs.

## 2.7 CABOTAGE AND INTERNATIONAL DRIVING

Girteka Logistics is strictly against traffic offences; the company constantly works on developing monitoring systems and on improving driver education to prevent traffic offences.

All applicable international and national traffic rules must be respected.

Girteka Logistics follows the EU and non-EU countries rules for cabotage. By using a combination of education, planning and integrating telematics data with our IT systems we are able to monitor our network and avoid mistakes in regard to cabotage. We work closely with national institutions in order to prevent cabotage infringements and adjust our processes and operations respectively.

## 2.8 SUPPLY CHAIN SECURITY

Combining traditional practices of supply chain management with the security requirements, for combatting threats such as terrorism, piracy and theft, Girteka Logistics commits its efforts to ensure security throughout its entire supply chain.

Girteka Logistics cooperates with the border control and other official institutions to prevent illicit trafficking and brokering of material.

Main supply chain security activities include verification of participants in the supply chain as well as screening and validating the contents of cargo.



## 3. OCCUPATIONAL HEALTH AND SAFETY

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 safe environment for their colleagues, through compliance with all safety regulations and exercising care to prevent accidents.

### 3.1 HEALTH AND SAFETY AT WORK

The Girteka Logistics is committed to:

- creating an accessible occupational health and safety management system that minimizes or eliminates risk of injury or illness to people associated with Girteka Logistics operations;
- engaging with all staff, visitors and partner organizations in creating a safe working environment and safe systems of work;
- developing and maintaining a culture that encourages all personnel to actively manage occupational health and safety risks;

- providing a continuously improving occupational health and safety management system by establishing and monitoring progress towards measurable objectives and targets aimed at eliminating work-related illness and injury;
- establishing an occupational health and safety management framework to meet legislative obligations to the highest possible standard.

Girteka Logistics takes the following actions to safeguard health and safety procedures at work:

- compliance with all relevant occupational health and safety legislation and requirements;

- provision of appropriate occupational health and safety training for all staff;
- dissemination of occupational health and safety information and instruction to all personnel;
- engagement with and inclusion of staff in consultation processes for decision making where there is an impact on workplace health and safety;
- definition, documentation and communication of occupational health and safety responsibilities, authority to act, and reporting requirements for personnel at all levels in the workplace;
- active identification and management of occupational health and safety risks, through the systematic identification and hazards, evaluation of risks and implementation of effective risk controls;
- prompt reporting of hazards, incidents and injuries, investigation where appropriate, and implementation of control measures to eliminate or minimize the risk of recurrence;
- a zero tolerance to alcohol and substance abuse at the workplace.

### 3.2 SAFE DRIVING

The occupational health and safety policy of Girteka Logistics applies at all times, including when work takes place outside of the office, such as the work of our drivers.

We commit to continuous monitoring of the average number of accidents per kilometre driven, reviewing the root causes of incidents and taking action to reduce the number of accidents.

Girteka Logistics owns new trucks, with an average age of 2,5 years. Therefore, every single one of our vehicles is equipped with emergency braking and lane assist systems, which are mandatory since November 2015.

Girteka Logistics takes an active part in the implementation of the safe truck driving programs, recommended by road authorities.

Girteka Logistics Drivers Academy provides education to each Girteka Logistics driver in order to fully support our drivers, proactively prevent accidents and promote safe driving. This includes:

- courses on driving in bad weather, applicable laws and regulations, eco driving;
- additional education and guidance for all drivers who drive in winter conditions;
- teaching the correct adjustment of truck side and front mirrors;



- teaching not to multitask when driving, including not using a mobile phone, and to concentrate on the road;
- e-courses such as manoeuvring a truck with a semi-trailer, driving in the UK;
- trainings on behaviour-based safety and industry-specific topics.

## 4. GIRTEKA LOGISTICS SUPPLY CHAIN SECURITY POLICY

Girteka Logistics, as a member of Transported Asset Protection Association (TAPA), commits to ensuring supply chain security according to the newest version of the TAPA TSR standard, when organizing international and domestic transportation by road of high-value cargo at risk of being stolen. This policy is applied to all companies and operational areas of the group, directly or indirectly linked to the transportation and transportation organization of high-value cargo at risk of being stolen.

This policy is based on the main TAPA Trucking Security Requirements (TSR) principles for supply chain and cargo security, modelling our operations across the whole supply chain.

### 4.1 THE GENERAL PRINCIPLES OF SUPPLY CHAIN SECURITY

- All employees and contractors related to the transportation of high-value cargo at risk of being stolen must be aware of and take responsibility for the security aspects of the organization's business.
  - Girteka Logistics commits to selecting a person responsible for supply chain security, with the aim to ensure a secure supply chain, and smooth operation and monitoring of TAPA TSR program.
  - Girteka Logistics commits to providing employees with appropriate supply chain security training.
- Hazard analysis and risk assessments must be carried out regularly.
  - Security procedures and guidelines must be effectively integrated into business operations.
  - Incident prevention must be the main priority.
  - Safety precautions and procedures must be regularly checked and approved by the person responsible, aiming to upkeep the high operational safety standards of Girteka Logistics.
  - The professionalism, knowledge, and level of honesty of the employees related to the security questions must be controlled.
- Education plans, employment, contract formation and termination procedures must be set and appropriately implemented.
  - All cases, including security breaches, must be reported; the cases must be analysed, and corrective actions must be taken to improve the overall security level.

# 5. COMPETITION

Competition laws, like all other legislation, are vital to us and must always be strictly adhered to.

To ensure compliance we must be aware of situations that could have an impact on competition.

Agreements, regardless of contract form, must always be negotiated in compliance with fair competition principles.

## 5.1 LIMITATION OF COMPETITION

You must not conclude any formal or informal contracts or agreements with the intention or probable effect of illegally restricting, eliminating, preventing or distorting competition.

You must not take part in any anti-competitive activities. These consist of, but are not limited to:

- limitation or controlling of production or capacity;
- price-fixing;
- market sharing or market division;
- limitation and control of capacity;
- meetings, conferences, forums, committees, and similar which are organised by trade or industrial organisations and may have an anti-competitive effect;

- exchange of information concerning prices or other terms and conditions regarding Girteka Logistics companies, suppliers or other related third parties;
- exchange of other illegal or confidential information.

## 5.2 MEETINGS, CONFERENCES AND VENDOR EVENTS

Never discuss business-related, potentially competition restricting topics with competitors.

If competition restricting topics are discussed at a meeting or industry forum, in disagreement with competition law, you must leave the room immediately and request that your departure and refusal to participate be entered into the minutes of the meeting. If minutes are not usually prepared at such meetings, employees must request the preparation of such minutes. If

the request is not accommodated, employees must write their own minutes and inform senior management accordingly.

You are advised to proceed with caution not only in physical meetings but also when participating in virtual forums (telephone meetings, social media forums, video calls, webcasts, etc.) where information may be published or shared.

If participation in such events takes place, be aware that any agreements made in such events, regardless of contract form, must always be negotiated in compliance with fair competition principles.

You should consult your immediate manager or the relevant senior management before participating in events where competitors may be present and business-related topics might be discussed formally or informally, this also applies to vendor events.

## 6. ANTI-CORRUPTION

Girtoka Logistics operates using the following specific rules to address anti-corruption. The principles do not prohibit normal and appropriate hospitality given or received. If in doubt, please contact your immediate manager or senior management.

### 6.1 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.

Girtoka Logistics 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.

You must not accept or offer a bribe of any kind.

### 6.2 KICKBACKS

Kickbacks are considered as a form of bribery.

All prohibitions towards bribery apply for kickbacks.

You must not accept or offer a kickback.

### 6.3 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.

You must not make facilitation payments or accept such practice in any country by any parties, including third parties acting on behalf of Girtoka Logistics, even if they are a part of local law or local custom.

### 6.4 MONEY LAUNDERING OR FINANCING OF TERRORISM OR OTHER CRIMINAL ACTIVITIES

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.

Concealment of the fund source or the intended use of funds may be involved in funding terrorism operations.

You 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.

## 7. GIFTS AND DONATIONS

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.

### 7.1 NO GIFT POLICY

You must not accept or offer gifts to or from 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 company's logo (such as pens, notepads, planners, calendars and other small promotional items) that are given out to employees, customers, delegates, students and members of the public, attending events such as conferences, exhibitions, trainings, career fairs, etc, and deemed as part of the company's brand building or promotional activities.

If you are offered a free dinner or to take part in an activity of a similar nature, you must disclose this to your immediate manager and get approval before accepting.

Seek advice from your immediate manager or senior management when further clarification is needed.

### 7.2 DONATIONS TO CHARITY

Girteka Logistics recognizes 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.

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, transparent and in accordance with national legislation.

Such activities are acceptable and are shown in Girteka Logistics CSR reports on the UN Global Compact website.

### 7.3 CONTRIBUTIONS TO POLITICAL CANDIDATES, POLITICAL PARTIES, ETC.

Girteka Logistics funds, services or property must not be used to support any political purposes.

Acting as a representative of Girteka Logistics, you are not allowed to engage in any political activities or support election campaigns, politicians, political parties or organisations on behalf of Girteka Logistics.



## 8. CONFLICTS OF INTEREST

A conflict of interest is when an employee's obligations and interests when acting on behalf of Girteka Logistics conflict with his or her personal interests. It is important that employees conduct business activities in the best interest of Girteka Logistics. 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.

### 8.1 SUPPLIERS AND CUSTOMERS

You must not participate in any commercial transactions between a Girteka Logistics company and a supplier or customer in which you have direct or indirect personal interests, financial or otherwise.

The transactions must be approved in advance by senior management of the relevant Girteka Logistics company.

This is applicable to transactions between a Girteka Logistics company 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.

### 8.2 EMPLOYMENT OF RELATED PARTIES

Reporting relationships, direct or indirect, are not permitted between related parties employed by Girteka Logistics, 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.

### 8.3 MONETARY LOANS TO EMPLOYEES

It is forbidden to give loans to its 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.

# 9. PROCESSING OF INFORMATION

You must respect and protect the confidentiality of information belonging to Girteka Logistics, our customers, suppliers and other business partners and we expect you to be loyal to our strategy and corporate values.

## 9.1 CONFIDENTIAL MATERIAL AND INFORMATION

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

All non-public information that could be of use to competitors or harmful to Girteka Logistics, including our customers, suppliers and other business partners if disclosed, is considered to be confidential and proprietary information.

Confidential or proprietary information may only be disclosed to a third party strictly on a need-to-know basis, unless the disclosure is required by law.

If you are not sure whether information is confidential and proprietary, and whether you are allowed to disclose it, consult with your immediate manager or senior management.

Detailed employee's confidentiality obligations are provided in the internal rules which have to be strictly followed.

## 9.2 DATA PRIVACY

To comply with data privacy legislation, Girteka Logistics 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.

Personal data is any personal information that can be used to identify an individual, directly or indirectly, for example: name, photo, email address, bank details, employment information or a computer IP address, etc.

Sensitive personal data is any personal data revealing racial or ethnic origin, political opinions, religious beliefs, etc.

You must only store personal data (including sensitive personal data) on Outlook, OneDrive and other company's or personal drives for a

short period of time until further processed. Follow internal procedures to process such data.

All personal data (including sensitive personal data) to be stored in the central IT system, must be forwarded or uploaded to the relevant system. When data is uploaded, the e-mail and/or data must be deleted from your personal files and Outlook.

You should only share personal data if you have a legitimate reason.

If you have any doubts about processing (storing, deleting or sharing) personal data and sensitive personal data, consult Privacy Responsible or, alternatively, senior management.

### 9.3 LOYAL CONDUCT

You are expected to loyally support our strategy and corporate values and to consider the impact of our brand and avoid any damaging or derogatory communications, whether online or elsewhere.

When communicating in the public domain, in any way related to Girteka Logistics, directly or indirectly, it is prohibited to communicate the following:

- Messages or postings, including comments or content about race, gender, disabilities, age, sexual orientation, pornography, religious beliefs and practices, political beliefs or national origin, irrespective of whether such message or posting is disclosed on an identified or anonymous user basis
- Messages or postings containing statements on any subject that could be mistakenly interpreted as the standpoint of Girteka Logistics
- Publication of defamatory and/or knowingly false material about Girteka Logistics, its employees and/or customers or suppliers on social networking sites or in any other online publishing format.

This applies regardless of the platform used, irrespective of whether such activities occur online or offline, the device is private or company-owned, during or outside the office hours.

### 9.4 ONLINE BEHAVIOUR

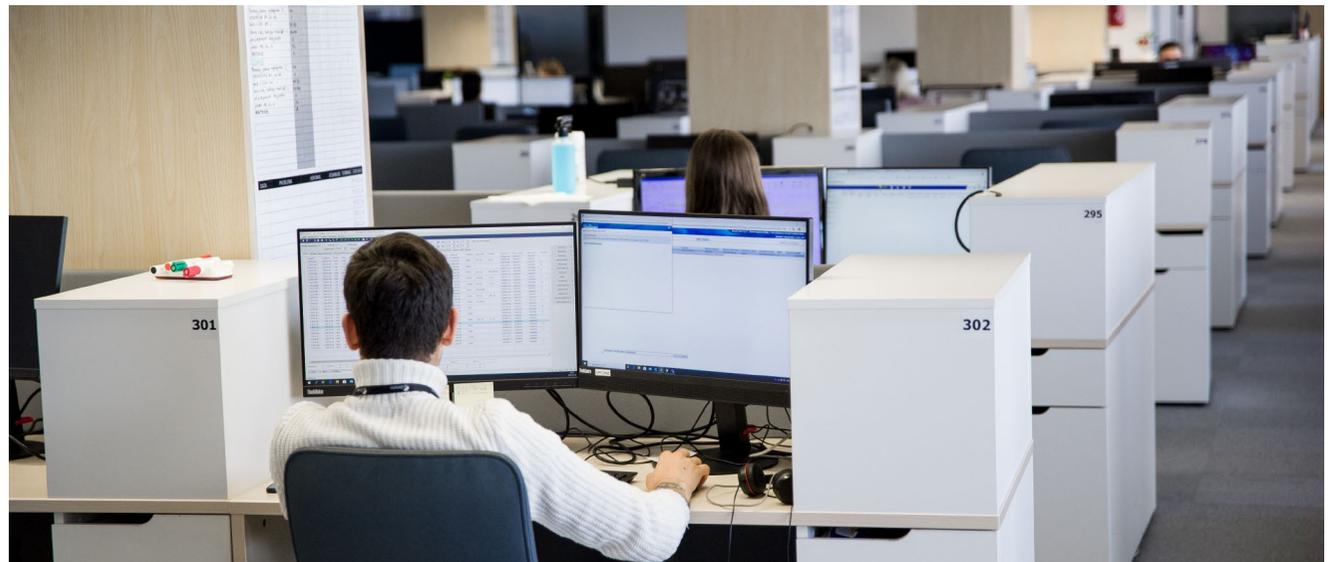
Girteka Logistics encourage the use of social media and other online platforms for business communication and networking purposes.

When interacting on personal social media platforms, such as LinkedIn, Facebook, Twitter, etc., consider all your posts as public and avoid disclosing confidential information.

It is forbidden to post messages/statements on any subject that could be interpreted as the standpoint of Girteka Logistics. Clearly formulate any of your posts and comments on social media to ensure that they reflect personal views and not those of Girteka Logistics, unless posted by an authorised representative of Girteka Logistics.

Any form of fraud or piracy of copyrighted materials, such as films or music and/or commercial software or other proprietary materials is forbidden when communicating on online platforms in a way related to Girteka Logistics.

Downloading of commercial software or any copyrighted materials belonging to a third party, unless downloading is covered by or permitted under an agreement concluded by Girteka Logistics, is forbidden when communicating on online platforms in any way related to Girteka Logistics.



# 10. ENVIRONMENTAL STRATEGY

Girteka Logistics is committed to the UN Sustainable Development goals and as a leading transport and logistics company, we take on our share of the responsibility to reduce the environmental impact of the transport industry.

We take measures to minimize adverse impacts on human health and the environment throughout the value chain. This includes minimizing pollution and its impact, promoting an efficient and sustainable use of resources, including energy, fuel and water, and minimizing CO<sub>2</sub> emissions in transport. Our aim is to ensure that local sites of administration, production, warehouses, garages and outsourced activities, including subcontractors, take all measures for air pollution mitigation.

The main goals of our Environmental Strategy are:

- to reduce pollution, CO<sub>2</sub> emissions, and waste;
- to increase the sorting and recycling of waste;
- to build awareness by involving employees and partners in efforts to protect the environment;
- to apply green criteria for purchasing;
- to comply with environmental legislation;
- to prevent potential environmental incidents and be ready to address any that might occur.

Girteka Logistics Sustainability Strategy, available on our website, outlines in more detail our goals and actions for promoting sustainable and responsible actions across the company.

## 10.1 SUSTAINABLE AND INNOVATIVE TRANSPORT AND LOGISTICS SYSTEMS

To the extent possible and when available, you must look for and offer sustainable and innovative transport and logistics systems that continually reduce our, our customers' and our suppliers' environmental impact.

Our services should always represent our environmental considerations, and you should support our business model development and improvement.

## 10.2 COMPLYING WITH PUBLIC AUTHORITY REQUIREMENTS

In Girteka Logistics we urge our employees to lead an open and constructive dialogue with authorities, shareholders, customers, suppliers and other stakeholders about environmental impact related to our activities.

## 10.3 CAREFUL SELECTION OF SUPPLIERS

Our suppliers are selected based on the criteria formulated in the Girteka Logistics Supplier Code of Conduct, which is distributed to suppliers and available on [www.girteka.eu](http://www.girteka.eu). The Supplier Code of Conduct describes what is considered appropriate business conduct by suppliers when they perform services on behalf of or supply services or products to Girteka Logistics.

You must ensure that suppliers are familiar with the Supplier Code of Conduct and take relevant steps to ensure compliance.

# 11. COMPLYING WITH THE CODE OF CONDUCT

If you need assistance or have questions or concerns about the Code of Conduct, you should first consult the person who best understands your area of responsibility: your immediate manager.

For employee (HR) related issues, e.g. concerns involving management and/ or other employees, you should contact your immediate manager and/or Human Resources representative.

Should this not be possible due to the nature of the concern, you are urged to reach out to senior management or use the Girteka Logistics Whistleblower Program.

Senior management considers any breach of the principles stated in this Code of Conduct to be a material neglect of duty by the relevant employee, which may lead to disciplinary measures up to and including termination of employment and summary dismissal.

You are urged to contact either your immediate manager or senior management in case of breach or suspected breach of the principles and rules outlined in this Code of Conduct.

Employees can file such reports without fear of retaliation, unless they take part in the breach of policies.

If you become aware of any breaches of Girteka Logistics Code of Conduct, please right away inform your immediate manager, senior management or through the Girteka Logistics Whistleblower Program (by emailing [prevention@girteka.eu](mailto:prevention@girteka.eu) or anonymously calling +370 5 2177396).

This applies to cases where you have a reason to believe that a concern will not be adequately handled through other available reporting channels, or if you feel uncomfortable speaking directly to your immediate manager, or have followed the normal hierarchy reporting procedure but feel that the concern was not properly acted upon.

