

CODE OF BUSINESS ETHICS

of the ROHLIG SUUS Group

As the ROHLIG SUUS Group of Companies, we operate according to the **highest ethical standards**. The ROHLIG SUUS Group's Code of Business Ethics (hereinafter the "Code") reflects the core values and aspirations on which our business is based.

We believe that the success of our organisation is based on proper business relationships, built on mutual trust and integrity. We are aware that transparent and ethical business conduct, compliance with legislation, fair **competition and respect for human rights and the environment** make us a reliable and credible partner.

The Code presents the values we hold dear in the implementation of the **Rohlig Suus Group's mission**. We have also described **our relationships with:** employees, Clients, business partners and local communities. While we support honest behaviour, we also present **our policies to the business environment**, in compliance with regulations and accepted norms. The Code also contains information on how to **report violations** and seek **support**. The principles contained in this Code apply to all Employees and Associates of the ROHLIG SUUS Group.

ROHLIG SUUS GROUP'S MISSION

Our mission is to increase the efficiency of our Clients' operations by **providing intelligent logistics solutions**. We add value to ongoing logistics processes by providing professional, **comprehensive and flexible services** designed as a more efficient and cost-effective alternative to in-house operations. We achieve our goals thanks to the commitment and professionalism of our Employees.



Values of the ROHLIG SUUS Group

ONE STEP AHEAD

We are experts in the logistics industry, anticipating the expectations of the market and our Clients by continuously expanding the range of services offered and streamlining internal processes with modern and innovative solutions.

Partnership

We build long-term business relationships with our Clients and business Partners. We strive to provide a professional, comprehensive and flexible service.

Continuous improvement

We built organisational culture geared towards continuous improvement by fostering individual development and raising the commitment of our Employees.



Why is the Code important?

The Code helps:

- 1) **prevent the occurrence of unlawful** or ethically questionable **behaviour**;
- 2) to promptly detect and **remove potential non-conformities and to introduce preventive measures**;
- 3) **aise our awareness** of health and safety at work, which reduces occupational risks and accidents;
- 4) **build trust**;
- 5) ensure transparency, including with regard to conflicts of interest;
- 6) maintain the right **balance between business development** and **environmental protection** along with social needs in this regard;
- 7) conduct business in accordance with rules of **sustainably**;
- 8) **save costs** associated with potential penalties or damages;
- 9) **protect the reputation of the ROHLIG SUUS Group**.

As Employees and Associates of the RÖHLIG SUUS Group:

- 1) **we familiarise** ourselves with the applicable laws and industry standards and the Code;
- 2) **we comply with the regulations, standards and principles of the Code**, guided by the Group's mission and acting on the basis of our values;
- 3) **we enforce all internal regulations** relating to the work we do;
- 4) **we seek support when we are unsure** how to proceed;
- 5) **we act in an ethical manner.**

RÖHLIG SUUS Group management personnel:

- 1) **creates a culture of open communication, helping our Employees** to get answers and resolve policy issues;
- 2) **creates a working environment** that enables the best results;
- 3) responds to any signs of **unethical behaviour and violations of the Code.**

OUR RELATIONS WITH OTHER PEOPLE

Our social responsibility focuses primarily on concern for education, healthy living, the environment and the family. These are areas that are particularly important to us, where we take additional actions in relation to other people.



Employees

We are all aware that the RÖHLIG SUUS Group is all about people, which is why we are committed to **an organisational culture** focused on broad growth and building an innovative future together. To make this possible, **as a responsible employer, we care about:**

- 1) **Safe and stable working environment** – we operate in accordance with applicable laws and standards and best practices to ensure safety in the workplace. We do our utmost to minimise the risks in the modern world and take measures to protect us as Employees and Associates. There is no place in the RÖHLIG SUUS Group for violence, bullying, harassment or any form of unethical behaviour.
- 2) **Work atmosphere** – we build relationships based on mutual respect and personal culture, resolve conflicts constructively and do not allow discriminatory behaviour and prevent the spread of false information.
- 3) **Equal opportunities in hiring, promotion and professional development** – we, as well as candidates, are fairly assessed against substantive criteria. Our aim is to employ specialists with extensive expertise. We are committed to ensuring that we remain motivated and fulfilled, which is why we ensure continuous development and equal access to professional development and promotion..

- 4) **Teamwork** – the ROHLIG SUUS Group’s mission can be achieved through team-based activities that foster the exchange of knowledge and experience. As a team, we care about the welfare of the ROHLIG SUUS Group. This is made possible by clear rules for cooperation, a concrete division of tasks, transparent, understandable communication of responsibilities and expectations, and project leadership.
- 5) **Open communication** – we believe that a culture of sustainable growth is only possible if we listen to each other. That is why we promote open and honest communication.
- 6) **Work-life balance** – we want us to be happy, so we encourage active leisure and relaxation with close ones.
- 7) **Our employees and their families** – as a family business, we are committed to initiatives carried out with our loved ones in mind.
- 8) **Healthy lifestyle** – we believe that taking care of your health improves your quality of life, so we motivate each other to take on sporting challenges by providing sports and healthcare packages.



Clients

We treat all our Clients as **long-term business Partners**. We aim to increase our Clients’ revenues by providing services and logistics solutions tailored to their specific business. We pursue this objective in line with our **ONE STEP AHEAD** strategy based on a pro-active approach to Clients and **highly personalised service**. Our approach in dealing with Clients is reflected in the following principles:

- 1) **Commitment** – the ability to understand the business and work effectively together based on long-term trust. Our priority is to comply with the terms and conditions agreed with our Clients.
- 2) **Responsibility** – we are guided by the well-being of Clients, supporting them by striving to provide the highest standards of service. In emergency situations, we follow the established business continuity plan.
- 3) **Excellence** – by employing specialists in their field, we offer solutions based on extensive expertise. We are constantly ensuring that we develop and improve and are looking for innovative solutions.
- 4) **Fair play** – we nurture partnerships and follow the principle of “fair play”. We provide full information on the services carried out. Business relationships with Clients are based on honesty, trust, precise rules, respect, as well as constant and open communication. We prefer win-win solutions.
- 5) **Proactive approach** – we meet the needs of our Clients by adapting our offers to them and supporting them in their daily challenges.



Business partners

Partnership is one of the core values of the ROHLIG SUUS Group, in which **building long-term relationships** based on the highest standards of service, **ethics and compliance** is a key element. We constantly extend a network of proven Partners, which enables comprehensive service delivery tailored to the Client's needs. We believe that in the sphere of responsible supply chain management, precise cooperation criteria and principles are essential, such as:

- 1) Transparency** – maintaining the highest standards of integrity and compliance with the law and generally accepted business regulations. We ensure access to reliable information at every stage.
- 2) Reputation** – the good name of ROHLIG SUUS Group companies is built by all Partners and brings tangible business benefits to them. Strict adherence to ethical standards allows us to build trust in the business environment, which is why we take our declarations seriously and expect the same from our Partners.
- 3) Uniform system of rules of conduct** – the introduction of uniform supply chain management standards for all business Partners allows costs to be optimised, the quality of services provided by individual participants to be increased, competitive advantages to be gained and reputational risks to be mitigated.
- 4) Mutual respect** – we base our relationship with Partners on mutual respect, consisting of substantive, professional but also open and honest communication. We assess cooperation on the basis of merit and business considerations, and we only make possible comments in good faith.
- 5) Sustainability** – we have a policy of sustainable development. We consider social and environmental factors in our activities. Sustainability means that the right balance must be maintained between business development and environmental and social needs. Our first priority is to work with those who, like us, aim to provide the highest level of service and conduct their business in the most environmentally friendly way possible.
- 6) Security of goods** – our aim is to ensure that goods are properly cared for at every stage of the service provided. We offer the highest standards for the safety of goods and the implementation of procedures to prevent irregularities. In emergency situations, we act immediately to eliminate risks and minimise damage.



Local communities

We carry out our activities in numerous **locations, among local communities**. We ensure that our business strategy is implemented in line with the concept of corporate social responsibility, taking into account the needs of local communities. We are therefore taking steps to collaborate and increase the positive impact of our activities. As a member of local communities, **we appreciate:**

- 1) Dialogue** – we seek to engage in regular dialogue with local communities, monitoring the impact of our activities on the environment. We are open to all suggestions and ideas for joint initiatives.
- 2) Education** – as professionals, we care about the standard of services provided in the industry, we share our knowledge with the student community, we impart knowledge about freight forwarding and logistics through lectures, exercises, workshops, study visits and internships for students.
- 3) Collaboration** – in our social activities we strive to respond to the current needs of local communities, so we work with NGOs that best understand current challenges. One of our priorities is to take care of future generations.
- 4) Environmental protection** – we recognise that it is our responsibility as a logistics and shipping company to care for the environment. It is with the utmost scrupulousness that we respect the environmental laws that apply to our business. We strive to limit the negative impact of our activities on the environment through proper waste management and cooperation with subcontractors for whom caring for the environment is a priority. We are committed to new environmentally friendly technologies and are involved in digitisation projects aimed at reducing the number of printed documents in the transport industry. We are implementing an effective system to identify and eliminate potential environmental risks. We also care about the environment in and around the workplace. **We ensure compliance with all applicable environmental laws, regulations and standards, including ISO 14001:2015 - Environmental Management System.** We calculate and strive to reduce our carbon footprint.

OUR PRINCIPLES FOR DEALING WITH THE BUSINESS ENVIRONMENT

The principles of conduct that guide us in the business environment are a signpost for the development and active **shaping of organisational culture**, including its ethical dimension.



We operate in compliance with regulations and accepted standards

1) Compliance with legislation and industry standards

In all areas of our business, we comply with the laws of the countries in which we operate. The above includes, among other things, payment of due taxes, compliance with competition and anti-trust laws, strict prohibition of corruption and money laundering, use of the latest technology, obtaining the required official permits, compliance with export control regulations and adherence to industry standards implemented in our operations.

2) Prohibition of violation of sanctions

We comply with laws governing trade sanctions (international and national) that prohibit or restrict transactions with certain countries, entities and individuals, as well as those concerning certain commodities (e.g. of strategic importance).

3) Monitoring changes in legislation and industry standards

We are aware that laws and standards change, so we monitor any changes so that we are able to adapt to them on an ongoing basis. Our priority is to **operate in compliance with the law and standards**.



We support fair behaviour in the workplace

We ensure that human rights are respected, acting in accordance with international and national standards.

1) Prohibition of child labour

We do not employ children under the age of eligibility for employment in a given country. If the minimum age of employment is not specified, we assume that it should be **16**. Employees **under the age of 18 may only work in accordance with local requirements** relating to working time and conditions and in accordance with education or training requirements.

2) Prohibition of forced labour

All forms of forced labour, including slave labour, are prohibited. All work done for us **is voluntary**.

3) Prohibition of discrimination

We are all treated equally, according to our skills and qualifications, with regard to the establishment and termination of the employment relationship, terms and conditions of employment, promotion and access to training to improve professional qualifications. **At the RÖHLIG SUUS Group, everyone is treated with respect and dignity.** We do not tolerate any discrimination on the basis of gender, age, disability, race, religion, nationality, political opinion, trade union membership, ethnic origin, religion, sexual orientation, length or duration of employment or any other reason.

4) Prohibition of violence

Personal dignity, privacy and personal rights of everyone must be respected. Corporal punishment or physical, sexual, psychological or verbal abuse, harassment or bullying is not acceptable.

5) Prohibition of mobbing

We do not tolerate behaviour involving harassment or intimidation, causing others to underestimate their professional suitability, intended to humiliate or ridicule, isolate or eliminate from a team of colleagues.

6) Freedom of association of Employees

We are free to join or resign from trade union membership or Workers' Representation, as we choose, without threat or intimidation. We recognise and respect the right to collective bargaining in accordance with current regulations.

7) Legal employment, fair pay and holiday entitlement

We only use legal forms of employment and remuneration and comply with working time standards, in accordance with the applicable regulations. We are entitled to at least one day off in each seven-day period, plus annual leave. Only extraordinary business circumstances may cause an exception.

8) Occupational safety and health

We implement **high professional health and safety** standards. We provide a working environment that is safe and conducive to health and prevent accidents and occupational diseases. We regularly assess workplace risks and **put in place appropriate** hazard control and countermeasures. We are suitably qualified and trained in health and safety. In situations that threaten health or safety, we act in accordance with accepted instructions. We report any incidents that may cause health or safety risks in the workplace.



We support fair behaviour in business relationship

1) Fair competition

We comply with all applicable antitrust and free competition laws. We do not tolerate:

- a. **anti-competitive agreements**, such as price-fixing,
- b. **aggressive measures** to eliminate competition,
- c. any attempt to **monopolise the market**,
- d. **disseminating** discrediting and **false statements about competitors**.

2) Avoidance of conflict of interest

The decisions we make **must be based on facts**, without the undue influence of vested interests. Any person who has information about a potential or actual conflict of interest is required to report it immediately in accordance with our whistleblowing policy.

3) Anti-corruption and anti-money laundering measure

We comply with applicable laws prohibiting the giving of financial benefits to any person or entity for the purpose of obtaining an improper business advantage. **All forms of corruption are prohibited**, including accepting or offering: material benefits (cash, monetary equivalent such as vouchers, coupons, etc.) or personal benefits that are illegal or lead to a violation of legal or ethical standards. The forms of hospitality and gifts used must not influence business decisions and must not give rise to obligations, expectations of reciprocity, additional benefits or preferential treatment. We comply with applicable anti-money laundering laws and regulations and maintain records, including financial statements, in accordance with relevant laws and regulations.

4) We verify our Clients and business Partners

We verify Clients and business Partners against sanction lists and as required by anti-money laundering and counter-terrorist financing regulations.

5) Principles of supply chain collaboration

As a participant in the supply chain, we recognise that the greatest efficiency will be achieved through collaboration. This is why **we engage in dialogue and work with Partners**, who act in accordance with our **Code of conduct for business partners**.

We aim to be prepared for any disruption to our operations (e.g. natural disasters, terrorism, malware, diseases, pandemics). Guided by security and the interests of Clients, we analyse risks and **develop business continuity plans**. Our integrated management system is compliant with **ISO 9001:2015**, allowing us to provide our Clients with a service that meets their expectations.

6) Confidentiality and personal data protection

We ensure **the highest standards of confidentiality in terms of data protection**, as well as the confidential details of the services provided. We treat confidential information received in the same way as we treat our own confidential information. Confidential information is at least company secret data. A business secret is any information, in particular technical, technological, commercial, organisational and other information of economic interest, which has not been made public and in respect of which the party concerned has taken the necessary steps to maintain its secrecy.

We only share information necessary for the proper provision of services according to strictly defined procedures, for a precisely defined purpose and only with authorised parties, in particular business Partners in the respective supply chain. Disclosures are made in accordance with data protection legislation.

Information and data is some of our organisation's most valuable resources. We have therefore introduced information security management principles based on the requirements of **ISO 27001**.

REPORTING THE INFRINGEMENTS

- 1) **The Code of Business Ethics** a set of ethical and legal principles that apply to us all. They enable us to make the right decisions. Each of us can report any, even potential, breach of law, internal regulations or unethical behaviour.
- 2) **Infringements** or irregularities can be reported:
 - a. **in writing** (by letter to the Compliance Department, on the address of the SUUS company where the violation occurred),
 - b. **by Your Voice Platform** (also anonymously),
 - c. **by email: compliance@suus.com**, in person or by phone to the Compliance Department.
- 3) We conduct **investigationse** in a fair and impartial manner.
- 4) **We do not tolerate retaliation** against any person who in good faith reports any infringement or irregularity.

COMPLIANCE WITH THE CODE

Failure to follow the rules can entail serious consequences.

Violations of the law may result in severe sanctions, both for the RÖHLIG SUUS Group companies and for persons who commit a wrongful act or omission. Consequences that may arise include fines, damages, compensation for personal and moral damages, reduced profits, loss of contracts, termination of business relationships, loss of reputation and therefore of position in a particular market or industry.

CONCLUSIONS AND RECOMMENDATIONS

The Code is a signpost in our daily work.

If you have questions about ethical conduct or the Code itself, please contact the Compliance Department:

compliance@suus.com