

CODE OF CONDUCT

FOR ROHLIG SUUS GROUP'S BUSINESS PARTNERS

As ROHLIG SUUS, we are a Group of Companies that operates according to the highest ethical standards. We also ensure that our Business Partners operate according to the highest ethical standards. The rules of conduct described in the **Code of Conduct for ROHLIG SUUS Group's Business Partners** reflect the fundamental values and aspirations on which our business is based.

The basis for the success of our organization are **proper business relations** based on mutual trust and honesty. We are aware that transparent and ethical business conduct consisting in applying the principles of compliance with the law and supporting honest behavior is the basis for good relations and will allow us to achieve common goals.

In the **Code of Conduct for ROHLIG SUUS Group's Business Partners**, we oblige you, to follow the described rules to ensure that we observe ethical principles throughout the entire supply chain.

In situations where the rules of conduct described above do not apply, we expect you to comply with the law in force in a given country.



Principle of compliance with regulations and adopted standards – which means in practice:

1) Compliance with laws and standards

In all areas of our business, you should comply with the laws and standards of the countries in which you conduct business, including industry standards. You should, among other things, pay due taxes and duties, comply with regulations on competition and consumer protection, as well as antitrust laws, strictly observe the prohibition of corruption and money laundering, apply state-of-the-art technologies to ensure data security, have the required permits, authorizations and licenses, comply with export control laws and respect the rights of third parties.

2) Prohibition on Violating Sanctions

You agree to strictly comply with all laws governing trade sanctions (international and domestic) that prohibit or restrict transactions with certain countries, entities and individuals and also for certain goods (e.g. of strategic importance).

3) Monitoring changes in industry laws and standards

Law and standards are changing, so you need to monitor any changes to adapt to them on an ongoing basis. Your priority should be **operating in accordance with law and standards**.



Promoting fair conduct in the workplace – which means in practice:

4) Ban on child labour

You cannot employ children below the age allowing for employment in a given country. If the minimum age for employment is not specified, we assume that it should be **16 years**. Workers **under 18 years of age may work only in accordance with local requirements** regarding working time and working conditions, as well as educational requirements. If there are no such rules, they should be given the opportunity to study.

5) Ban on forced labour

We do not accept any forms of forced labour, including slavery. We oblige you to ensure that every work is done **voluntarily**.

6) Ban on discrimination

You must ensure that your employees are treated fairly, according to their skills and qualifications in the scope of establishing or terminating employment relationship, employment conditions, promotion and access to training upgrading their professional qualifications (**principle of equal treatment**). **Everyone should be treated with respect and dignity**. Under no circumstances should your employees be discriminated with regard to their sex, age, disability, race, religion, nationality, political opinions, trade union membership, ethnic origin, religion, sexual orientation, duration or dimension of employment, or any other reason.

7) Ban on violence

Personal dignity, privacy and rights of every individual must be respected. Your employees cannot be subjects to corporal punishment or physical, sexual, psychological or verbal harassment or bullying.

8) Ban on mobbing

You will not tolerate behaviour consisting in persistent and prolonged harassment or intimidation of employees, resulting in underrecognition of their professional usefulness, causing or aimed at humiliation or mockery, isolation or elimination of colleagues from the team.

9) Freedom of association of employees

Your employees should be **free to join or resign from a trade union membership or be represented** in accordance with their choice, without threat or intimidation. You should respect the right to collective labour agreements in accordance with applicable regulations.

10) Legal employment, fair remuneration and right to rest

You are obliged to use **only legal forms of employment and remuneration** and to ensure that working time standards are respected. All your employees should be entitled to at least one day off in each seven-day period and to holiday leaves. Only extraordinary business circumstances may be an exception.

11) Occupational health and safety

It is important for us to implement **occupational health and safety standards at a high level.** Therefore, you need to ensure safe and healthy working environment, prevent accidents, injuries and occupational diseases. You should regularly assess workplace risks, **introduce appropriate risk control** and remedial measures. Your employees must be suitably qualified and trained in occupational health and safety. In situations endangering health or safety, act in accordance with accepted instructions and report any risk to health or safety at the workplace to the relevant authorities.



Supporting fair conduct through our actions – which means in practice:

12) Fair competition

You are obliged to comply with all applicable antitrust and free competition laws. **The following shall be prohibited:**

- a. **anti-competitive agreements** such as price collusion,
- b. **aggressive action** taken in order to eliminate competition,
- c. any **attempt to monopolise the market,**
- d. **dissemination of** discrediting and **false statements about the competition.**

13) Avoidance of conflicts of interest

Your decisions must be based on facts, and not influenced by personal interests. Any person who knows of a potential or actual conflict of interest must report it immediately.

14) Anti-corruption and anti-money laundering actions

We oblige you to comply **with the applicable laws that prohibit giving financial benefits to any** person or entity in order to gain an inappropriate business advantage.

All forms of corruption, including accepting or offering: material benefits (cash, cash equivalent such as vouchers, coupons, etc.) or personal benefits which are illegal or lead to violations of legal or ethical standards are prohibited. Your hospitality arrangements and gifts must not influence your business decisions, give rise to claims, expectations of reciprocity, additional benefits or preferential treatment. You must comply with applicable anti-money laundering laws and regulations and have records, including financial statements, in accordance with applicable laws and regulations.

15) Principles of supply chain cooperation

We want to be prepared for any disruption in the supply chain (e.g. natural disasters, terrorism, malicious software, diseases, pandemics, etc.), therefore we expect you to carry out a risk analysis and **implement business continuity plans**, as well as a system to prevent and mitigate actual or potential impacts in the supply chain.

We expect the interests and assets of all entities in the supply chain (ROHLIG SUUS Group's companies, our Customers and Business Partners) to be protected against loss, damage, embezzlement, theft, misappropriation, fraud or destruction. This protection applies to both tangible and intangible assets, including knowledge, know-how and ideas.

16) Confidentiality and personal data protection

It is important for us to ensure **the highest standards of confidentiality in terms of protecting the data of Customers, Business Partners and Employees**, as well as details of the services provided. Received confidential information should be treated as own confidential information, with no less than a reasonable and customary level of protection. Unless otherwise specified in the agreement, at least data constituting a trade secret shall be considered confidential information. We treat trade secret as any non-public information, in particular technical, technological, commercial, organisational and other information of economic importance, in respect of which the interested party has taken the necessary steps to keep it confidential.

You will provide only necessary information for the proper provision of services for a clearly defined purpose and only to authorised entities, in particular Business Partners in the supply chain. The disclosure of data shall be in accordance with the provisions on the protection of personal data.

17) Information security

In order to make the right decisions in an efficient and effective way, we recognize how important it is to have the required information with high credibility. We undertake and expect from you - our Partner, that you will make every effort to ensure that the information in our possession is up-to-date, complete, true and protected against unauthorized changes. This information will also be available to everyone to the minimum extent necessary to perform the entrusted tasks.

18) Sustainability

We expect you to have **a sustainable development policy**. Sustainability means maintaining the right balance between business development and the need of environmental protection and related social needs. Manage economic processes in an ethical manner, guaranteeing at the same time minimizing the risk of interference with the negative impact on the natural environment. **We ensure compliance with all applicable environmental laws**, regulations and standards, including **ISO 14001:2015 - the Environmental Governance System** and we expect you, to seek to support objectives related to the protection of the climate by providing services using modern tools guaranteeing minimal interference with the environment.

As a Business Partner of the ROHLIG SUUS Group, you also undertake to:

- a. disclosure, at the request of the Group, of information on the impact of its operations on the natural environment, including: the amount of greenhouse gas emissions, waste, electricity, water, gas, fuel consumption and alternative energy sources used.
- b. taking actions aimed at reducing the consumption of natural resources, the amount of waste, emissions and pollution, as well as educating employees and encouraging them to adopt pro-ecological attitudes.

19) Verification of Business Partners

We verify our Clients and Business Partners on sanctions lists and in accordance with the requirements of anti-money laundering and counter terrorism financing regulations, and we also expect you to verify your Business Partners and Customers.

20) Due diligence in the supply chain

We expect you to assess the various risks that may arise in the supply chain, to select proportionate measures for it and aim at gradual improvement of your systems and processes. The aim is to avoid the negative effects of events that occur or may occur in the whole supply chain and affect all its actors. You should do so in particular by:

- a. adapting your activities to the current market situation (re-routing, change of means of transport, change of sales markets, etc.);
- b. upgrading facilities, equipment, means of transport to ensure safety, compliance with legal requirements and minimal interference with the environment;
- c. developing policies and processes to ensure due diligence, including a system for identifying red flags and assessing risks;
- d. training Employees to ensure knowledge of procedures and processes;



Rules of communication and cooperation

Please refer to the **Code of Ethics** for more information on our ethical principles. If you see or suspect behaviour that may lead to a breach of the rules, send a notification to the e-mail address: **compliance@suus.com**. We process all applications with the highest standards of security and confidentiality. You can also use **Your voice platform**, which allows you to make an anonymous notification.

We reserve the right to verify the compliance of your activities with the presented rules by conducting an independent audit. Non-compliance with the rules shall be considered a material breach of the agreement and the rules of cooperation, which shall entitle us to terminate the cooperation within the ROHLIG SUUS Group.

You are obliged to inform your subcontractors providing services to ROHLIG SUUS Group companies about the rules resulting from the code of conduct for ROHLIG SUUS Group's Business Partners and ensure their compliance with the rules.