



Code of conduct

GIRTEKA GROUP



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Introduction from the CEO

Introduction from the CEO

Girteka Group has grown over the last 25 years to become a multinational company, working daily with the world's best-known brands. As Europe's leading asset-based transport company we have an international team of 20,000+ people, made up of many nationalities, cultures, and people who have different experiences in life. The Girteka Group Code of Conduct sets the standard for our ethical behavior and serves as a guide to help you understand our policies and to support the delivery of our corporate values.

Girteka Group's reputation and business depend on complying with all applicable laws, rules, regulations, and contractual obligations in all the countries where we operate. Every Girteka Group company and employee must follow all relevant national and international legislation.

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

Our Code of Conduct sets out what behavior is expected of the Girteka Group and its employees, business partners, and customers. It is the responsibility of all employees to understand and adhere to the company's policies and procedures. However, the Code cannot cover every issue that may arise in our company, and therefore you

A portrait of Edvardas Liachovičius, the CEO of Girteka. He is a middle-aged man with short, dark hair, wearing glasses, a dark suit, a white shirt, and a dark tie. He is smiling slightly and looking towards the camera. The background is blurred, showing some greenery and a modern office environment. A green diagonal line runs across the bottom right of the image.

Edvardas
Liachovičius

Introduction from the CEO

should always use common sense when conducting business on behalf of the Girteka Group. If you are uncertain about any public laws, policies, or contractual obligations, then seek advice.

As a company, we hope going forward to celebrate not just our longevity but also sustainable growth, employee satisfaction, enhanced road safety, a reduction in our environmental impact and the continued support of the community at large in sustainable development.

The need for sustainable growth and development is ever – increasing, and together, as individuals and as a company we need to focus on our costs and the efficiency of our assets, whilst embracing the productivity benefits of digitalisation to improve processes and make better decisions.

Our Girteka Group Code of Conduct is based on our company values and applies to all companies and employees, management, and our 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 Group Whistleblower Programme.

Edvardas Liachovičius
CEO Girteka Holding

Continuous improvement and quality management policy

1. Continuous improvement and quality management policy

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

GOAL – Girteka Group's continuous improvement and quality management system – comprises of four parts:

G – Girteka Group. Our Sense of Purpose and Strategy

This part of the management system is the foundation that directs the organisation, communicating Our Sense of Purpose and Strategy:

- strategic plan formation and setting goals for every employee;
- goal setting methodology, cyclical review of results;
- shaping goals for 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 performance of tasks, raising employee qualifications, process review and standardisation, and the sharing and documentation of process information. This part is formed of two main models:

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

A – Advance. Striving to implement beneficial breakthroughs

This part of the system demonstrates how the organisation implements breakthroughs. Such breakthroughs can vary – from large projects to many small KAIZENS which have a large impact. The main focus is:

- 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 cornerstone and philosophy that we use for internal process improvement. In 2014 we decided to begin the implementation of LEAN, aiming to shorten the time of order execution, reduce costs and improve work safety and service quality. The main directions are:

- LEAN methodology understanding and culture development in the organisation;
- constant application of LEAN methods in everyday operations helping to develop employee autonomy, responsibility, and teamwork.

The aims of the GOAL quality management system:

- ensure employee involvement and reaching for results, based on the organisation's strategic goals and Our Sense of Purpose;
- offer high-quality services which meet clients' demands; create additional value for clients while ensuring profitable growth of the organisation;
- guarantee to stick to the stated quality and other standards;
- raise employee qualifications, professionalism, and work efficiency;
- encourage and foster the culture and quality management system to ensure continuous organisational development and improvement;
- realise and develop operations based on LEAN philosophy and methodology, removing unnecessary waste;
- operate with the aim to reduce CO2 emissions, and involve employees and partners in environmental protection initiatives.



Working Conditions

2. Working conditions

In Girteka Group we strongly believe in human rights, as provided in the Charter of the United Nations 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 Group, whether directly as Girteka Group employees or indirectly as employees of our suppliers, must be treated with dignity and shown the highest respect for their fundamental rights.

2.1 COMPLIANCE WITH THE UN HUMAN RIGHTS

Girteka Group fully supports and will always work to comply with conventional human rights and labour laws.

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.

You must recognise and support equal human rights for all.

You must not tolerate:

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

The above applies irrespective of age, nationality, race, disability, or gender, including gender identity or gender expression, sexual, religious, or political orientation, and 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 Group 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 a 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 Group commits to react immediately 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 Group complies with current national legislation and agreed standards for employee working hours, wages, and work environments.

Obligations to employees under international conventions, national law, and regulations concerning regular employment are not

avoided through 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 Group, 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 programmes 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 a minimum must meet national legal standards and –/– or industry benchmark standards, whichever is higher.

A deduction from wages as a disciplinary measure shall not be permitted.

All workers are provided with a written and understandable 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 Group 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 Group 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 Group 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 can monitor our network and avoid mistakes regarding cabotage. We work closely with national institutions 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 Group commits its efforts to ensure security throughout its entire supply chain.

Girteka Group 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.



Occupational Health and safety



3. OCCUPATIONAL HEALTH AND SAFETY

The occupational health, safety and well-being of our employees is a core value of our company. It is critical that we ensure a healthy physical and psychological working environment for our employees in each of their workplaces, whether on the road, our own sites or those of our clients, we are committed to not only monitoring and improvement but proactive approach to safety. Each employee should contribute to upkeeping their safety at work and the creation of a safe environment for their colleagues, through compliance with all safety regulations and exercising care to prevent accidents.

3.1 Health and safety at work

Girteka Group is:

- treating health and safety as a core value of company. All attitudes, choices, and actions in all respects take consider safety. What is leading to proactive approach to safety to eliminate all possible hazards in occupational environment;
- creating an accessible occupational health and safety management system that minimises or eliminates risk of injury or illness;
- engaging with all staff, visitors and partner organisations in creating a safe working environment and safe systems of work;
- developing and maintaining a behaviour based safety policy that encourages all personnel to actively manage occupational health and safety risks;
- Providing a continuously improving occupational health and safety management system by foreseeing approach by taking initiative to eliminate all hazards;
- operating a no blame safety culture where employees are encouraged to speak openly about problems and the obstacles to progress;
- Girteka Group leaders are empower employees to put safety before results and to create Health and safety environment.

- To ensure the most safe and hygienic working conditions with use of the newest scientific and technical achievements.

Girteka Group takes the following:

- compliance with all relevant occupational health and safety legislation and requirements;
- occupational health and safety training for all staff;
- 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 as well as improve safe environment and safety culture awareness;
- documentation and communication of occupational health and safety responsibilities, authority to act, and reporting requirements for personnel at all levels in the workplace;
- learning from incidents, is just one of many activities in managing safety that are registered internally and investigated along with Incident sharing and Near miss reporting;
- active identification and management of occupational health and safety risks, through the systematic identification and hazards, 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 reoccurrence;

We have procedures in place to ensure on time reporting, investigation, communication, and preventive actions of further occurrences of work related health, safety and wellbeing incidents and Near miss events within the Girteka Group. This applies to all operating areas, for all employees and sub-contractors. a zero tolerance to alcohol and substance abuse at the workplace.

3.2 Behaviour Based Safety Policy

Safety is one of the main goals in terms of people and the cargo that we are delivering. To secure people and maintain ongoing operations we have a Behaviour Based Safety (BBS) policy in place, that covers all the activities and areas needed to reduce the number of accidents.

We are involving management at every stage of the BBS policy to ensure alignment across the whole Girteka Group and its operations. Our leaders are inspiring and empowering employees to implement safety behavior in their day-to-day life. To secure continuous improvement we cooperate with our colleagues to identify and resolve hazards that occurs in their work environment. We have also specified and provided appropriate Personal Protective Equipment for each place of work, with clear instructions on how to use them, with a maintenance and servicing process in place.

The BBS system is evaluated internally on a regular basis. The goal is to learn from observations and to positively influence the future behaviour of workers to gradually improve the safety culture across the organisation.

It is acknowledged by the management that

unsafe actions, poor decision making, at risk behaviour, etc. are signs that the company has a poor safety culture. For the management to evolve the safety culture it must show commitment which involves the management and employees attending regular safety meetings, trainings according to risk assessment on each work place, and initiatives like the ECO Driving training league or annual mandatory safety training courses for drivers, Gemba Safety Walks during which we point out the hazards to employee and tell them what are possible consequences of unsafe actions.

Additionally, we have implemented a Near Miss Reporting System when an unsafe condition, near miss etc. is reported and communicate back what actions have been taken to avoid future incidents and reduce the number of accidents. All written procedures and instructions are communicated internally on a regular basis, establishing a sufficient level of information to secure the safety of our employees and the community.

Our top management leads by example in following procedures and using PPE, and are open to any suggestions or concerns from employees on

improving safety systems and procedures. As we know that safety issues are crucial, senior management along with employees do take immediate actions whenever there is an unsafe situation or near miss reported and communicate widely and openly the action plans for future improvements.

We encourage a team spirit and trust between employees and management, and show commitment to safety within all activities, through regular controls, discussions and improvement programmes.

Girteka supply chain security policy

4. Girteka supply chain security policy

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

This policy is based on the main TAPA 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 organisation's business.

Girteka Group commits to appointing a person responsible for supply chain security, with the aim to ensure a secure supply chain, and smooth operation and monitoring of the TAPA TSR programme.

Girteka Group 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 maintain the high operational safety standards of Girteka Group.

The professionalism, knowledge, and integrity 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.

Competition

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

organized by trade or industrial organisations and may have an anti-competitive effect;

- exchange of information concerning prices or other terms and conditions regarding Girteka Group 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.



Anti-corruption

6. Anti-corruption

Girteka Group 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.

Girteka Group 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 Girteka Group, 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.

Gifts and donations

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

The No Gift Policy strictly prohibits all employees from giving or accepting gifts no matter the value or the reason (except token gifts of nominal value). You must not solicit, accept, or offer gifts to clients, prospective clients, business partners, government officials, suppliers or any other third parties.

Although gifts may be well intended, it can potentially pose as a conflict of interest or might be seen as act of corruption. The No Gift Policy is in place to avoid situations which may influence the employee's judgment in a decision-making process or put the employee in a position of conflict or obligation not in the best interests of Girteka Group.

An exemption to the policy is token gifts

that are of nominal value, for example gifts with a company 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 a 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.

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

7.2 DONATIONS TO CHARITY

Girteka Group 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.

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 the Girteka Group CSR reports in UN Global Compact Update of Progress.

Conflicts of interest

8. Conflicts of interest

A conflict of interest is when an employee's obligations and interests when acting on behalf of Girteka Group conflict with his or her personal interests. It is 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.

8.1 SUPPLIERS AND CUSTOMERS

You must not participate in any commercial transactions between a Girteka Group 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 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.

8.2 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.

8.3 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.

Processing of Information

9. Processing of information

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

9.1 CONFIDENTIAL MATERIAL AND INFORMATION

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

All non-public information that could be of use to competitors or harmful to Girteka Group, including our customers, suppliers and other business partners if disclosed, is 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 must be strictly followed.

9.2 DATA PRIVACY

To comply with data privacy legislation, Girteka Group 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 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 the Girteka Group Data Protection Officer or, alternatively, senior management.

9.3 LOYAL CONDUCT

You are expected to loyally support our business strategy and corporate values and to consider the impact your actions have

on 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 Group, 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 Group

Publication of defamatory and/or knowingly false material about Girteka Group, 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 Group 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, 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 Group. Clearly formulate any of your posts and comments on social media to ensure that they reflect personal views and not those of Girteka Group, unless posted by an authorised representative of Girteka Group.

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 Group. 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 Group, is forbidden when communicating on online platforms in any way related to Girteka Group.

Environmental management system policy

10. Environmental management system policy

Girteka Group is committed to minimising pollution, promoting efficiency and the use of sustainable resources, including energy, fuel, and water, and reducing CO2 emissions.

Within our strategies, policies, and procedures the Ten Principles of the UN Global Compact are incorporated into the company at every level. Our focus is on getting the balance of environmental, social, and governance factors right.

To ensure that Girteka Group contributes to Environmental protection, we systematically develop and continuously improve our Environmental Management System (EMS).

The EMS has allowed us to identify risks and opportunities on how to improve results. We determine our organisation stakeholders, their needs, and expectations as below:

Our EMS is prepared and certified under the ISO 14001:2015 standard and commits to the following main goals:

- Apply green criteria for purchasing;
- Measure our customers' CO2 emissions and provide them with reports;
- Prevent potential environmental incidents and be ready to address any issues that do occur;
- Search for new green solutions for our customers' cargo transportation (more information about this

- in Sustainable Cargo Transportation);
- Monitor and comply with the environmental legislation in all the countries in which we operate;
- Reduce pollution, CO2 emissions, and waste;
- Increase the sorting and recycling of waste;
- Build awareness by involving employees and partners in efforts to protect the environment;

Our aim is to ensure that our EMS programme is applicable to all organisation activities, from local offices, production facilities, warehouses, garages, and outsourced activities, including subcontractors to all take measures towards pollution mitigation. We know that environmental impact reduction starts from measuring what it is.

10.1 SUTAINABLE AND INNOVATIVE TRANSPORT AND LOGISTICS SYSTEMS

To the extent possible and whenever 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 Group 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 Group Supplier Code of Conduct, which is distributed to suppliers and available on www.GirtekaGroup.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 Group.

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



Complying with the code of conduct

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 Group Whistleblower Programme.

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 Group Code of Conduct, please right away inform your immediate manager, senior management or through the Girteka Group Whistleblower Programme (by emailing 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.



