

# LOCOTRANSSPED

## Code of Ethics





As a provider of international transportation and freight forwarding services, we operate a strategy based on Corporate Social Responsibility. The aim of this Code is to ensure ethical conduct of Locotranssped Sp. z o. o. towards all stakeholders, shaping a proper work culture within the company and between the company and its environment. For employees, the Code facilitates the pursuit of common goals, while for external stakeholders, it serves as important information about the conduct standards respected by the company, considering the needs, rights, and expectations of all our business partners. The Code is based on generally known, accepted, and universal social interaction rules and ethical principles. This Code is binding for every employee and collaborator of Locotranssped Sp. z o. o..

**Rafał Mroziński – CEO Locotranssped**  
**2024-05-07**



## **RESPONSIBILITIES**

Compliance with the principles of the Code is the responsibility of every employee of our company and persons working for it. Responsibilities:

1. President - responsible for ensuring the effective functioning of this Code.
2. Employee, person working for Locotranssped Sp. z o. o. - responsible for complying with the principles of this Code and for reporting cases of violation or breach of this Code.
3. Managers/Team Leaders, HR Department - responsible for receiving reports and promptly forwarding them to the Management Board.
4. Person managing the investigation, investigating the case - responsible for efficiently managing the actions and the team investigating the reported violations or breaches in accordance with this Code.

## I. BUSINESS ETHICS POLICY

The Management Board commits to the following actions during operations:

### 1. In terms of employees:

a) Compliance with legal requirements specified in Polish law and regulations defined in documents of the International Labour Organization, including:

- Voluntary employment
- Absence of forced labor
- Job stability
- Compensation as agreed
- Working hours as agreed
- Opportunity for meetings, gatherings, expressions
- Employment of minors under clearly defined conditions that do not endanger their health or lives
- Absence of discrimination for any reason • Overtime work as agreed

b) Enabling employees to actively participate in company matters affecting them.

c) Ensuring workplace safety, fire safety, especially regarding the use of machinery and equipment, vehicles, chemicals, work at heights.

d) Undertaking activities to minimize occupational risks and applying risk control measures.

e) Minimizing incidents related to workplace safety, especially accidents.

f) Improving working conditions.

### 2. In terms of the natural environment:

a) Compliance with legal requirements specified in Polish environmental law.

b) Minimizing emissions of pollutants into the air, waste, energy consumption, raw materials, water.



c) Promotion of eco-friendly activities among business partners.

### **3. In terms of society, external parties:**

a) Compliance with societal rights arising from Polish law and respecting societal voices regarding undertaken actions.

b) Allowing expression of opinions about company activities.

c) Promoting ethical approaches among society and external parties.

### **4. In terms of business ethics:**

a) Compliance with national and international regulations in cooperation with suppliers and clients.

b) Protection of intellectual property.

c) Protection of data relevant to counterparties.

d) Counteracting corruption, unfair competition, unfair influence on the decisions of other parties.

e) Promoting ethical conduct among the Management Board, employees.

## **II. DETAILED PRINCIPLES**

### **1. Compliance with legal regulations, applicable standards, and principles**

We commit to complying with all applicable national and international legal regulations, as well as international standards and principles.

### **2. Human rights**

Locotranssped Sp. z o. o. ensures compliance with human rights as defined in the Universal Declaration of Human Rights.

Respect is one of the values of our management philosophy. Full respect and mutual respect are part of our daily activities. All human beings are born free and equal in dignity and rights and should act towards each other in a spirit of brotherhood.

### **3. Combating discrimination**

At Locotranssped Sp. z o. o., discrimination and unfair treatment are prohibited.

The company ensures the implementation of procedures guaranteeing equal treatment regardless of gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, religion, sexual orientation, as well as regardless of employment on a fixed-term or indefinite basis, or on a full-time or part-time basis.

The company does not tolerate any form of harassment or verbal and/or physical assault, violence, or bullying.

### **4. Employee rights**

Locotranssped Sp. z o. o. adheres to the regulations of the International Labour Organization and the laws of the countries where its facilities are located.

Locotranssped Sp. z o. o. establishes appropriate regulations covering the rights and obligations of employees. We expect our employees to comply with the rules contained in detailed regulations.

The company ensures voluntary employment and absence of forced labor.

The company guarantees compliance with the rights of children and youth. It does not tolerate any form of child labor exploitation.

The company respects the right of employees to form organizations and associations, as well as the right to conduct collective negotiations by appropriate entities representing their interests.

### **5. Safety and hygiene principles**

Locotranssped Sp. z o. o. is committed to safety, health support, and ensuring employees a safe, healthy, and hygienic work environment.

For this purpose, we provide appropriate resources on behalf of the company (such as safe infrastructure, adapted social facilities, among others).

We also commit to continuously improve the work environment.

We expect our employees to comply with the rules regarding safety and hygiene at work and to take care of their health.

We regularly train our employees - according to their roles - in the scope of applicable health and safety standards and precautions, and we require them to comply with relevant occupational health and safety regulations.

## **6. Working hours**

We commit to comply with applicable regulations and company standards regarding working hours, statutory days off, as well as relevant International Labour Organization conventions and applicable laws.

We aim to ensure a balance between employees' private life and work.

## **7. Remuneration**

Remuneration rates are determined in accordance with applicable legal regulations.

We regularly provide our employees with clear and detailed information on how their remuneration is calculated.

## **8. Opportunity for meeting, gatherings, expressions**

Employee opinions and freedom of expression are important to Locotranssped Sp. z o. o.

Therefore, we engage them in company decisions. The Management Board and employee representatives cooperate constructively and ensure intensive exchange of experiences.

## **9. Finance and accounting**

Employees use the material values and financial resources of Locotranssped Sp. z o. o. and conduct transactions on behalf of the company based on assigned rights and obligations in accordance with the principle of correct accounting as required by law.



We commit to making appropriate records in a complete, precise, and truthful manner.

## **10. Handling company property**

We manage the assets of Locotranssped Sp. z o. o. prudently and properly and use them for activities serving the company's purpose.

The company's property also includes communication tools and intangible values such as experience or economic intellectual property rights.

Without clear consent from the appropriate superior or company regulation in this regard, we do not use these tools for private purposes or remove them from the company premises.

## **11. Competition**

We adhere to principles of fair competition.

We present our achievements honestly and objectively.

Information about competitive companies is obtained from legal sources.

We do not engage in unfair advertising.

We do not recognize policies that hinder other companies' access to the market.

We do not take actions aimed at discrediting our Competitors.

The company does not participate in conspiracies or take any actions to influence prices or conditions, allocate sales areas or customers, or limit free competition.

## **12. Natural environment**

Locotranssped Sp. z o. o. is aware of its impact on the environment through emissions of pollutants into the air from transportation activities.

During operations, the company aims to consider environmental aspects, especially fuel consumption, air emissions, and minimize this impact.



### **13. Confidentiality and data protection, intellectual property**

All data and information obtained or produced during the performance of official duties are the property of Locotranssped Sp. z o. o. and may only be used in its interest.

Locotranssped Sp. z o. o. adheres to regulations and agreements regarding intellectual property rights in its conduct.

As employees of Locotranssped Sp. z o. o., we ensure that confidential information and company documents are only transmitted in connection with assigned duties and permissions to individuals or companies who are their sole recipients.

Only authorized employees make publications on websites or social media platforms.

Confidential information is only disclosed in accordance with statutory provisions and regulations issued by courts or other authorities.

Maintaining confidentiality also applies after termination of employment with Locotranssped Sp. z o. o.

We collect, process, and/or use personal data of employees and third parties only if these individuals have given appropriate consent or if there are legal grounds for doing so.

### **14. Supporting employee development, education / mutual relationships**

We support the personal development of our employees. To this end, we implement appropriate development programs and staff training, provide our employees with opportunities for challenging work, and enable them to identify with our company.

At the same time, we expect our employees to be open and willing to take responsibility for their own education and development.

### **15. Anti-corruption action**

Locotranssped Sp. z o. o. avoids cooperation with entities that do not apply the same standards assuming zero tolerance for corruption.

The company has an anti-corruption policy that everyone is required to follow.

## 16. Compliance with principles

All employees are trained in the Code of Ethics.

Anyone who observes a breach of the principles of this Code is required to follow the Ethics Escalation Policy.

### III. REPORTING VIOLATIONS

1. The legal entity accepts Reports in written form electronically.
2. Reports can be made through:

a) Written notification via email to [whistleblowing@locotranssped.eu](mailto:whistleblowing@locotranssped.eu) using the Internal Reporting Form or in free written form;

b) Written notification via the dedicated platform for anonymous reports, Esignaller, available at the link [www: https://app.esignaller.pl/breach/report/locowhistleblower](http://www.https://app.esignaller.pl/breach/report/locowhistleblower), the link to which is made public on the website of the legal entity;

3. When making a Report, the reporting person may provide their correspondence address or email address, which will be treated as a "contact address".
4. The Report of Irregularities should provide a clear and comprehensive explanation of the subject of the Report and should include in particular:

a) The date and place of occurrence of the Irregularity or the date of obtaining information about the Irregularity,

b) Description of specific situations or circumstances that may lead to the occurrence of the Irregularity,

c) Identification of the entity to which the Irregularity pertains,

d) Identification of any potential witnesses to the Irregularity,

e) Identification of all evidence and information available to the reporting person that may be helpful in the process of reviewing the Irregularity.

5. Making a Report of a Breach that did not occur constitutes a violation of the law and is subject to penalties specified in the Act.
6. The legal entity allows for the submission of anonymous Breach Reports (in the manner specified in point 5.2 above). The legal entity reserves the right to



leave anonymous reports without recognition. To maintain anonymity, the legal entity provides a dedicated platform Esignaller, the structure of which allows Whistleblowers to anonymously submit Reports of violations and abuses, handle reports and communicate with Whistleblowers on the legal entity's side in an anonymous and encrypted environment compliant with applicable regulations.

**Approved by:** CEO - Rafał Mroziński 07.05.2024 r.