

Ethics escalation policy





As an international transport and shipping service provider, we follow a strategy based on Corporate Social Responsibility.

Should anyone detect an action that does not comply with the applicable ethical principles, they are obliged to initiate this procedure.

Rafał Mroziński, President of the Management Board

2023-08-04



1. Employees, partners and other stakeholders can report irregularities where there has been or may have been a breach of the rules of conduct adopted and applicable at LOCOTRANSSPED Ltd.
2. Any violations of the ethical principles set out in the Code of Ethics must be reported, including but not limited to:
 - legal violations,
 - violation of human rights,
 - violation of employee rights,
 - criminal offence,
 - fraud,
 - endangering the health and safety of any person;
 - environmental damage.
3. Only genuine concerns should be raised. This policy is intended to address concerns raised in relation to specific issues of public interest and described below.
4. With regard to a report made in good faith, even if it is not confirmed, no action will be taken against the reporting person. However, if the allegations made by the reporting person are not made in good faith, maliciously and with absolutely no justification, disciplinary action may be taken in accordance with the company's regulations and in accordance with applicable law.
5. Means of reporting violations:
 - a. in any form to a supervisor or to the human resources department,
 - b. Should for some reason the information cannot be directed to the above-mentioned units:
 - i. Violations can be reported by e-mail to: whistleblowing@locotranssped.eu / hr@locotranssped.pl
 - ii. By traditional mail, please send the report by post to the following address:

Locotranssped sp. z o.o.
Abp. A. Baraniaka 88c, building D
61-131 Poznań
6. Description of the situation, violations:
 - a. The information, when possible, should include a precise description of the situation, the event: what rules, regulations were violated, who was

involved, potential losses and other relevant data for further consideration.

- b. The reporting person is not expected to prove the wrongdoing that they witnessed or suspect.
7. In order to fairly investigate the report, it is recommended that the reporting person's contact details be provided. These will be treated confidentially insofar as this is practically possible.
8. It may be the case that disclosures under this policy may involve highly confidential and sensitive matters and, as such, anonymous reporting is permitted. Anonymous reports will be subject to consideration. In such a case, LOCOTRENSSPED will endeavour to fully investigate the concerns, although a full investigation may be hampered if no further information can be obtained from the person reporting.
9. Each report is logged, analysed and investigated by the Management or a team appointed by the Management. The contact details provided will, if necessary, be used to contact the person reporting the abuse for further clarification or to pass on a response.
10. The Board or another person on behalf of the Board will acknowledge receiving the report within 5 working days and respond to the contact to discuss next steps.
11. The Management Board or an appointed team carries out the investigation. The investigation is conducted as quickly and diligently as possible in accordance with all relevant laws and regulations. You will be regularly updated on the progress of these investigations and any action to be taken, if necessary.
12. The purpose of this investigation is to determine whether wrongdoing has occurred and, if so, to what extent, and to minimise the risk of further wrongdoing in order to prevent further loss of assets, reputational damage and to protect all sources of evidence.
13. The Board or appointed team shall make every effort to conduct investigations as quickly and fairly as possible. Where all data is available, actions should be completed within 14 days.
14. A confidential report shall be drawn up by the Management Board or an appointed team including:
 - a description of the violation and the provisions, rules that apply,
 - an estimate of the losses and whom they affect (which stakeholders),
 - a loss recovery plan,

- a summary of the resources deployed to complete the work;
- actions taken to prevent and detect such incidents;
- recommendations on the purpose of reducing the risk of recurrence.

15. If reported violations are confirmed, LOCOTRANSSPED will act in accordance with applicable laws and work regulations.

16. The Management Board will be obliged to inform the relevant departments and individuals will be subject to official consequences in accordance with the law and internal regulations.

17. The Management Board or the appointed team shall inform the parties concerned of the findings insofar as the law permits, possibly by investigating the relevant services.

18. Should any party disagree with the findings, they may lodge a complaint at the address mentioned in point 5.

19. A test of the procedure shall be carried out by the Management Board at least once every three years. The purpose of the test is to verify the effectiveness of this policy.