

LOCOTRANSSPED

Code of Ethics



As an entity providing transport and forwarding services on the international arena,
we follow a strategy

based on Corporate Social Responsibility.

The purpose of this Code is to ensure
ethical activities of Locotranssped Sp. o.o.

with respect to all applicable parties,
shaping the right work culture within the company
and between the company and its environment.

The Code is intended to make it easier for employees to pursue common goals.

For the external environment, the Code is to be important information about the
standards of conduct respected by the company,

and taking into account the needs, rights
and expectations of all our business partners.

The Code was created on the basis of generally known, accepted and accepted rules
of coexistence

and universal ethical principles.

This Code is binding for every employee and associate

Locotranssped Sp. z o.o.

Rafał Mroziński – President of the Management Board
2023-08-04



RESPONSIBILITY

The obligation to comply with the Principles of the Code rests with each of our Employees and persons working for our company.

Responsibility:

1. President of the Management Board - is responsible for ensuring the effective functioning of this Code.
2. An employee, a person working for Locotranssped Sp. z o.o. - is responsible for complying with the principles of this Code and for reporting violations of this Code.
3. Drivers/Team Leader, HR Department - is responsible for accepting applications and directing them immediately to the Management Board.
4. The person in charge of the investigation of the case - Responsible for efficient managing the activities and for the team investigating the violation report in accordance with this Code.

I. BUSINESS ETHICS POLICY

During the implementation of activities, the Management Board undertakes to take the following actions:

1. In terms of the employee:

a) Compliance with legal requirements set out in Polish law and regulations set out in the documents of the International Labor Organization, including:

- Voluntary employment
- No compulsion to work
- Work stability
- Remuneration as agreed
- Working hours as agreed
- Possibility of meetings, meetings, speeches
- Employing young people on clearly defined terms that do not threaten their health and life
- No discrimination on any grounds
- Overtime work as agreed

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

c) Ensuring work safety, fire safety, in particular in the area of used machines and devices, vehicles, chemicals, work at heights.

d) Taking actions to minimize occupational risk and applying control measures resulting from occupational risk.

e) Minimization of incidents related to occupational safety, in particular accidents.

f) Improvement of working conditions.

2. In terms of the natural environment:

a) Compliance with legal requirements set out in Polish environmental law.

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

c) Promotion of pro-ecological activities among business partners.

3. In terms of society, external parties:

a) Observing the rights of society under Polish law and respecting the voices of society regarding the actions taken.

b) Allowing statements about the company's activities.

c) Promote an ethical approach to the public and external parties.

4. In the field of business ethics:

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

b) Protection of intellectual property.

c) Protection of data relevant to contractors.

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

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

II. SPECIFIC RULES

1. Compliance with laws, applicable standards and policies

We are committed to complying with all applicable national and international laws as well as international rules and standards.

2. Human rights

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

Respect is one of the values of our management philosophy. Respectful and respectful treatment of each other is part of our daily activities. All people are free and equal in dignity and rights and should act towards one another in a spirit of brotherhood.

3. Counteracting discrimination

Locotranssped Sp. z o.o. prohibits discrimination and unfair treatment.

The company ensures the application of procedures that guarantee equal treatment regardless of gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, denomination, sexual orientation, and regardless of employment for a definite or indefinite period or full-time employment. or part-time.

The Company does not tolerate any kind of harassment or verbal and/or physical harassment, violence and mobbing.

4. Employee rights

Locotranssped Sp. z o.o. complies with the regulations of the International Labor Organizations and the national regulations in which the plants are located.

Locotranssped Sp. z o.o. creates appropriate regulations specifying 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 no compulsion to work.

The company guarantees the observance of the rights of children and young people. The company does not tolerate any form of exploitation of children and young people.

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

5. Rules of occupational health and safety

Locotransped Sp. z o. o. is committed to safety and health and cares about providing employees with a safe, healthy and hygienic working environment.

For this purpose, we provide appropriate measures on behalf of the company (such as, for example, secure infrastructure, adapted social facilities, etc.).

At the same time, we are committed to continuously improving the working environment.

We expect our employees to comply with the company's health and safety rules and to take care of their own health.

We regularly train our employees - according to their function - in the scope of applicable health and safety standards and precautions and oblige them to comply with relevant health and safety regulations.

6. Working time

We are committed to complying with applicable laws and workplace standards regarding working hours and statutory holidays, as well as relevant conventions of the International Labor Organization and applicable law.

At the same time, we strive to provide employees with a balance between private life and work.

7. Remuneration

Remuneration rates are determined in accordance with applicable law.

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

8. Possibility of meetings, meetings, speeches

Opinions, freedom of expression of employees are important to Locotranssped Sp. z o.o.

That is why we involve them in company decisions. The Management Board and employee representatives cooperate constructively and ensure an intensive exchange of experiences.

9. Finance and accounting

Employees use the tangible assets and cash of Locotranssped Sp. z o.o. and carry out transactions on behalf of the enterprise based on the assigned rights and obligations, while maintaining the principle of correct accounting resulting from the provisions of law.

We undertake to make relevant records in a complete, accurate and truthful manner.

10. Dealing with Company Property

We operate the assets of Locotranssped Sp. z o.o. in a prudent and appropriate manner and we use it for activities that serve the purpose of the enterprise.

The company also owns communication tools and intangible assets, such as experience or economic protection rights.

We do not use these tools for private purposes or remove them from the company premises without the express consent of the relevant supervisor or company regulations in this regard.

11. Competition

We apply the rules of competition: fair play.

We present our achievements honestly and objectively.

We obtain information about competing companies from legal sources.

We do not use dishonest advertising.

We do not recognize the policy of preventing other companies from entering the market.

We do not take actions aimed at discrediting our Competitors.

The Company does not participate in collusion and does not take any action to influence prices or conditions, to allocate sales areas or customers, or to limit free competition

12. Natural environment

Locotranssped Sp. z o.o. is aware of its impact on the environment through the emission of pollutants into the air due to the transport carried out.

During the works, the company wants to take into account environmental aspects, in particular fuel consumption and air emissions, and to minimize this impact.

13. Confidentiality and data protection, intellectual property

All data and information obtained or generated in the course of performing official tasks are the property of Locotranssped Sp. z o.o. and may only be used in its interest.

In its conduct, Locotranssped Sp. z o.o. complies with the provisions and agreements in the field of intellectual property rights.

As employees of Locotranssped Sp. z o.o. we ensure that confidential information and company documents are transferred only in connection with the entrusted duties and authorizations to persons and companies that are their sole addressee.

Publications on websites and social networks are made only by authorized employees.

We only disclose confidential information to the public in accordance with statutory provisions and ordinances issued by courts or other authorities.

The secrecy also applies after termination of the employment relationship with Locotranssped Sp. z o.o.

We collect, process and/or use personal data of employees and third parties only if these persons have given their consent or if there are legal grounds for it.

14. Supporting the development of employees, education / mutual relations

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

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

15. Anti-corruption

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

The plant has an anti-corruption policy that everyone is obliged to follow.

16. Compliance with the rules

All employees are trained in the code of ethics.

Anyone who perceives a violation of the principles of this code is obliged to follow the Ethical Escalation Policy.

III. REPORTING VIOLATIONS

You can report a violation by e-mail to: whistleblowing@locotranssped.eu

You can also send the report by letter to:

Locotranssped Sp. z o.o.
Ul. Arb. A. Baraniaka 88c / bud. D
61-131 Poznań

Approved by: President of the Management Board Rafał Mroziński 04.08.2023.