

CODE OF CONDUCT



Prepared in 2020. Updated in 2024

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About

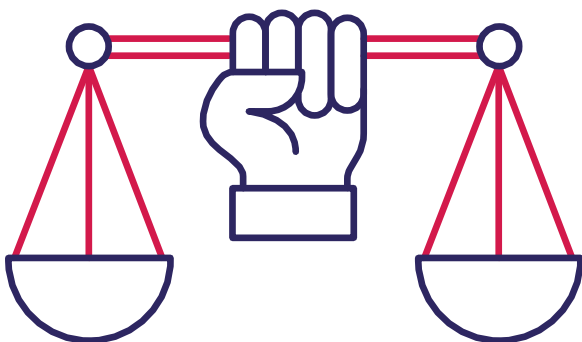


1.1. What is the Code of CONDUCT?

Based on the principles of responsible business and ethics, established in over a few decades, which are the foundation behind the fair and sustainable business development and expansion at Vlantana, this Code of Conduct reflects the commitments and principles that guide all of the company's employees in their activities both inside and outside of the company.

1.2. Who is it for?

In our day-to-day business activity we follow this Code of Conduct which establishes the principles of conduct and sets forth recommendations on how to act and what decisions to make. The Code of Conduct applies to us all – from managers to colleagues, including our partners all over the world.





1.3. Values

We base our activity on our mission, vision, and the following values.

Innovation. _____

We improve and become more efficient in our technological and procedural decisions every day.

Leadership. _____

By showing initiative and being curious and creative we continuously grow and encourage others to see, hear and speak.

Responsibility. _____

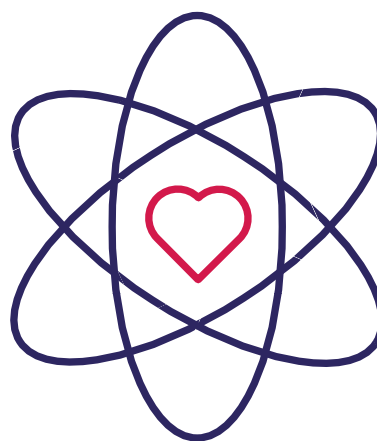
We take responsibility for our activity and the decisions we make. We are socially, legally, financially, economically, ecologically and morally responsible.

Respectfulness.

We respect ourselves, our family, clients, colleagues, society and environment. We accept the feelings, wishes, accomplishments and choices of others.

Agility.

We are always ready for change, we act quickly, effortlessly and confidently, we are productive and result-oriented.



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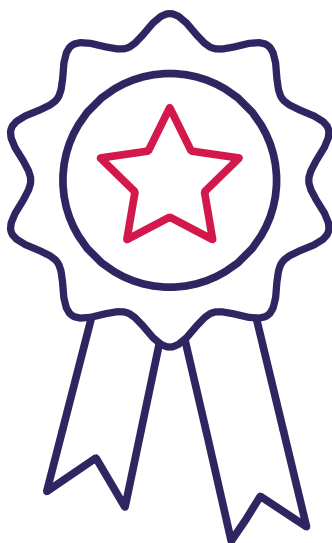
Organization

2.1. Working conditions

The employees of the company follow the highest professional and ethical standards accepted in the society. The organization ensures dignified and respectful behaviour and respects a person's right to privacy.

Appropriate working environment

The company seeks to create a safe and healthy working environment for each employee and to continuously improve it by investing in the creation of a productive working environment, improving the ergonomics of the workstation and renewing the work equipment.



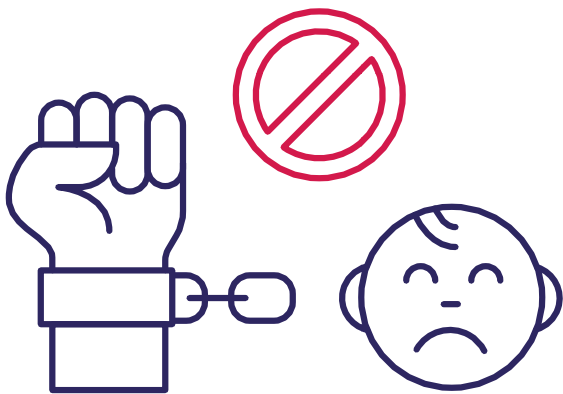
Forced labour

Forced labour is not tolerated at the company, human rights are respected, employment relationships are based on the principle of free personal choice, physical or psychological punishments are not used.

Terms and conditions of employment of children and young people

Exploitation of children at work is prohibited at the company. The company follows all requirements of the United Nations Convention on the Rights of the Child (1989) and is strictly against any child labour. Child labour is also not tolerated at the companies of the suppliers, clients or partners. In the event that it is confirmed that a supplier or a partner has been using child labour, the relevant public authorities shall be informed in all cases.

Legal employment of young people is encouraged, provided that they are employed under the laws in force and protected from any work or participation which, due to the conditions or the nature of the work, may be harmful to their health, safety and/or morale. The employment of young people shall be governed by the [legislation governing the employment of persons under the age of 18 and their working conditions](#) of the country of employment.



Appropriate remuneration

The company sets high professional and ethical requirements for its employees, values their honesty, loyalty and initiative. The employees are guaranteed appropriate remuneration for their work which is consistent with mutual agreement and legislation in force.

Association activities

The company respects the possibility of employees to unify and cooperate, as well as their right to collectively represent and defend their interests. The employees' freedom and right to associations and collective negotiations is in no way restricted.



Intolerance to alcohol and drugs

The company does not tolerate the use of alcohol or other psychoactive substances on the company's premises, its territory or on lots administered by the company and located abroad and shall react strictly to any employee who arrives to the workplace intoxicated or under the influence. The company employs technical and organizational means in order to prevent intoxication at work, prepares preventative measures and encourages a healthy lifestyle.



Respect

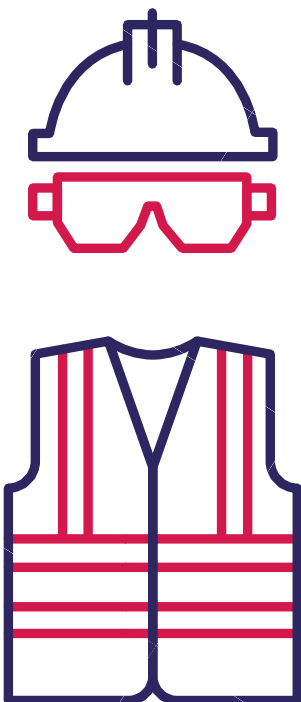
The relationships among the employees of the company are based on mutual respect, honesty and trust;

- The employees shall not restrict each other's rights and shall avoid personal insults, gossip, defamation, reputational damage, violations of human dignity and demonstrations of negative emotions;
- The employees shall interact with their colleagues and team members in a polite manner;

The company does not tolerate insults towards or humiliation of another person.

2.2. Health and safety

The company ensures the safety of work processes, immediately reacts to harmful or dangerous risk factors that appear in the working environment, eliminates them, installs collective safety equipment or provides personal safety equipment, plans and implements preventative measures and encourages the initiatives that promote the health and well-being of the employees.



2.3. Personal development

Development opportunities that focus on the employees' ambitions and help to turn them into sustainable personal, team and business development are encouraged. The company promotes the initiative and the creativity of the employees, invests into their personal development and the development of their professional competencies. The employees are supported and encouraged to acquire adjacent professions in order to increase work productivity. They are also encouraged to gain experience and improve qualifications by perfecting customer service culture and participating in the training or the seminars organized by the company, as well as to raise awareness about the provided services by deepening the knowledge and conducting the analysis of the goods and the provided services.

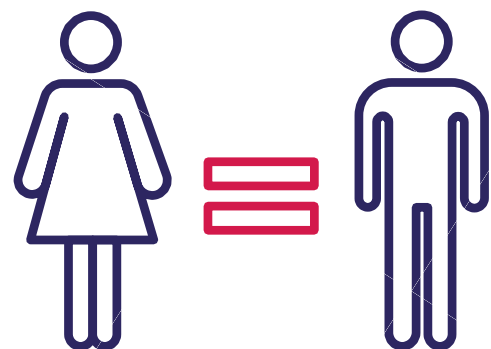


2.4. Equal rights / non-discrimination

Direct and indirect discrimination of employees is not tolerated at the company. Harassment, sexual harassment and discrimination based on the following (including, but not limited to) are prohibited:

- gender,
- race,
- nationality,
- language,
- origin,
- social status,
- age,
- sexual orientation,
- disability,
- ethnic origin,
- membership in an association,
- religion, beliefs, convictions or views.

The company has adopted an [equal opportunities policy and procedure for its implementation](#).



2.5. Responsible use of the company's assets

At the company, the employees follow an established procedure for the protection of material assets and documents, protect the company's assets, use equipment and instruments efficiently, use materials, energy and other material resources economically and rationally.

The employees of the company protect the company's assets from harm, losses and criminal offences, use them only for work purposes and never dispose of the company's assets for personal benefit, unless it has been agreed differently with the management. The employees always look after their workstation, keep it tidy and clean (take care of tools, do not keep unnecessary items, papers, etc. at their workstation), maintain the company's territory.



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Business environment

3.1. Quality

By knowing the clients and their expectations well, the employees of the company seek to ensure the best quality of services. We are committed to provide services which meet or exceed the expectations of our clients. High quality management, trustworthiness, responsibility, flexibility and sustainability are all incredibly important in satisfying the clients' expectations.

The company continuously promotes quality culture and works on improving freight transport services and their management decisions. In order to ensure the highest quality of services, the clients are offered only the solutions that best fit their needs.

3.2. Responsible provision of services

In order to provide high quality services, the employees assume all responsibility for their actions, decisions, words and their consequences. The employees value reputation and transparency, are able to provide clear arguments and a logical basis for their decisions. Professional activity is based on personal responsibility for the consequences and the potential benefit or harm resulting from them. The employees understand the company's commitments to the interested parties and fulfil them responsibly.



3.3. Competition

The company's business is based on the principles of fair competition; unlawful arrangements with clients, suppliers or officers representing public authorities are prohibited.

By declaring that competition promotes efficiency and novelty, we respect our competitors and their activities and comply with the laws that are in force in all markets in which we actively participate.

3.4. Business partners

The company's business partners follow the highest professional and ethical standards accepted in the society, adhere to agreements and fulfil obligations. They have the same or similar values, show interest in innovation, are leaders and professionals in their field, value quality, principles of sustainability and responsible business. The company values mutual respect and full cooperation.

In order to lead in the field of logistics and transportation we are contributing towards the creation of appropriate supply chain innovations and measures in the logistics and transportation community.



3.5. Protection of confidential information and personal data

It is extremely important to ensure the protection of the company's confidential information. Confidential information is non-public technical information or non-public information regarding assets or finances, as well as data on shareholders, employees and clients. The list of confidential information shall be approved by the head of the company. The employee must know which information is confidential and if there is any doubt, the employee must learn about it.

- Confidential information inside the company shall only be disclosed if it is necessary. The employee is prohibited from disclosing confidential information to another person, even if they are an employee of the company, unless permission to do so has been given. The employees are also prohibited from disclosing confidential information to their family members and friends.
- In the cases where persons who are not employed at the company are made aware of confidential information, further protection of this information must be ensured.
- The employees shall not use confidential information for unlawful purposes. They must also take appropriate measures to protect confidential information against loss, theft, illegal use or modification.
- Employees who are leaving the company shall be reminded of their obligation to continue protecting and not disclosing the confidential information which they became aware of during their employment at the company.
- The company expects its new employees who were previously employed at other companies not to disclose the confidential information of these companies.
- At the company, the personal data of the employees and other natural persons are processed strictly in accordance with the requirements of the legal acts regulating the protection of personal data. More detailed rules regarding the principles of the collection, processing and storage of data subjects' personal data, as well the means and the purposes of processing of such data are laid down and defined in the company's privacy policy and the company's protection of personal information of employees policy.
- In order to protect confidential information and ensure the safety of the processed personal data, the company has implemented effective technical and organizational measures which are regularly reviewed and updated.

04

Globally



4.1. Hospitality and gifts

The main principle of the company's activity is transparent and ethical business. The company is strictly against any gift or payment giving or offering, unless its purpose is to strengthen the company's image or it may be interpreted as such. Gifts shall not be offered or accepted if they may influence the company's or its partners' business decisions.



04

4.2. Environmental protection and responsible consumption

Sustainability is a better future for all of us. We employ the necessary measures to encourage our employees to lead a more ecological lifestyle – from reducing the energy consumption in our objects and premises to sorting waste for recycling and disposal at the company.

The company promotes environmental protection and follows all environmental requirements, saves natural resources, sorts waste and recovers it in accordance with the requirements for the recovery of waste by type. The company aims to foster the company employees' responsibility and understanding of environmental protection and conservation of natural resources as it is not only the company's but also each person's responsibility.

In order to reduce the negative environmental impact, vehicles are regularly upgraded or renewed into vehicles that use less polluting fuel (LNG, CNG); this way their technical characteristics contribute to the reduction of environmental pollution. By using the train and ferry transportation services we aim to lessen CO2 emissions. The company shows interest in and in its activity uses technologies that have the least negative environmental impact and works to prevent pollution and to improve the state of the environment. The company participates in new technology development programs and seeks to be the first to implement ecological measures in its activity.



04

4.3. Responsible legitimate activity

The company undertakes to comply with all laws and other legal acts, including, but not limited to, the requirements regarding anticorruption, social responsibility, human rights and freedoms, and the protection of children's rights. Financial records are kept in accordance with all accounting requirements.

In its interactions with different interested parties, the company shall act ethically, fairly and responsibly. In the event where this code does not define relevant norms and principles of conduct, the decisions made must follow the highest standards of reliability, trustworthiness, fairness and transparency accepted in the society.



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4.4. Fair and transparent communication

The company is committed to communicate with its business partners, society, media and other interested parties in a fair, professional and legal manner. Communication must follow the highest ethical, objectivity and transparency standards.

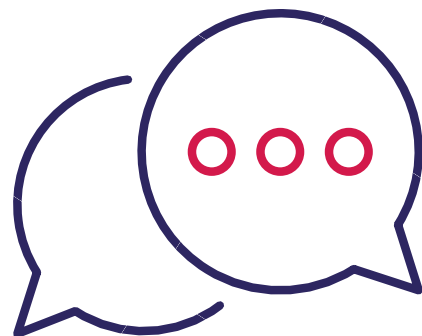
In order to ensure a professional, consistent, legitimate and fair communication with the media and other interested parties, official representatives are appointed to publicly communicate on behalf of the company.

In order to ensure that the information provided contributes to the strengthening of the company's reputation and its connections with the interested parties, the communication of the employees responsible for public communication is based on the following essential rules:

- **Communication with the media shall be proactive and their inquiries shall be responded to promptly.**
- **The information provided shall be detailed, accurate, appropriate and objective.**
- **The tone of communication shall be respectful and focused on the identification of mutual interests.**

Behaviour and speech shall promote the company's values and demonstrate its position as a reliable partner and an inspiring and responsible employer, as well as constantly increase the trust in the company's brand. Clients and other interested subjects are always informed about the developments of the company and relevant news; the best practice and feedback are shared throughout the company.

The representatives of the company disclose all information which is necessary to disclose under legal acts and other requirements that apply to the company, with the exception of confidential information. Prior to disclosure, it is necessary to always verify that such information is accurate and not misleading.





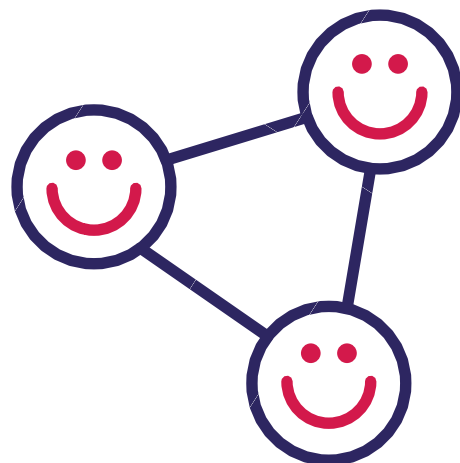
4.5. Political neutrality

The company is politically neutral and does not support any political parties, political organizations or politicians; the company seeks to ensure that the support granted is not used to finance political parties or political campaigns and/or to cover the political campaign members' debt commitments that were incurred during the political campaigns or that are related to such political campaigns.

The company respects the private life of its employees, but expects to become aware of all cases where the employee's personal interests may conflict with their professional responsibility, therefore, the employee shall in all cases inform their supervisors about the intention to participate in any political activities.

4.6. Community support and involvement

The company supports social, health, science and sports projects that benefit the society and are in line with the company's long-term strategic objectives and its values. Because the company considers investments into the society an important factor which helps to employ, retain and involve its people and develop their community, it encourages their activities which conform with and add to the strategy, vision and main values, and contributes to the development of those communities in whose environments the activity is conducted.



05

**Why is this
code
important
to us?**

05

We are committed to fair operation under high ethical standards. All interested parties follow the company's vision and values in their representation of the company. The vision inspires us to be the leader regarding innovations in the field of logistics and a reliable partner that provides unique highest quality services to the client. Since our values define who we are, what we believe in and how we conduct ourselves, it is necessary that every employee of the company understands them, acts accordingly, is responsible and follows these principles and main values in day-to-day work.

If the employees find themselves in difficult or ambiguous situations in their day-to-day work or have any doubt regarding conduct or decisions, they can check if their actions and decisions are in line with the company's code of conduct by answering the following questions:

- **Does it comply with this Code of Conduct?**
- **Does it comply with our values which we base our decisions on?**
- **Is it ethical?**
- **Is it legal?**
- **Is it beneficial to the company's brand?**
- **Am I prepared to answer for my behaviour publicly?**

If at least one of the answers is negative, it is recommended to reconsider the intended actions and if unsure, consult the supervisor.

The code is published and publicly available at www.vlantana.it



