

Code of Conduct

Preamble

The STS Logistic Code of Conduct is a collection of significant company values and principles that are in force around the world. The Code describes the basic rules of conduct when performing work at STS Logistic and in cooperation with STS Logistic.

The Code sets out rules for responsible conduct in contact with employees, business partners and other stakeholders along the entire value chain. All parties should treat each other fairly and equitably. All interested parties are obliged to comply with the Code of Conduct, including all laws and ethical standards. In this way, STS Logistic creates the basis for building partnership and assumes responsibility as a company.

The main element of the code are the rules of fair conduct and respect for employees' dignity.

The principles described in the code are based on the Universal Declaration of Human Rights adopted by the United Nations (UN), the basic labor standards set out by the International Labor Organization (ILO), the principles of the UN Global Compact and the internal regulations of STS Logistic.

Economic, ethical and ecological values must not contradict each other. The goal is to combine the principles of rational management with the social and ecological strategy of the company, as well as linking with the values and the resulting actions.

Scope of Application

The Code of Conduct applies to employees of STS Logistic, its trading partners and their contractors. In addition to the Code of Conduct, there are also (unlimited) rules of conduct, which may have been established separately for individual areas of activity. If in doubt, follow the stricter rules.

Working hours

The working time should be determined in accordance with the laws of the country. No employee may exceed the average 48-hour weekly working time during an average 5-day working week. Overtime work is accounted for in accordance with the applicable provisions of the Labor Code regulations.

Conditions of employment

A formal document should be drawn up regulating the employment conditions of the employee, for example in the form of an employment contract or a letter confirming employment. The signed document must meet the legal requirements and contain data on remuneration, payment periods, retirement benefits, holiday allowance, notice period, etc.

Children's work

Work performed by persons under 15 years of age is considered child labor and is not tolerated. In countries where there is compulsory schooling up to a certain age, the age limit set is decisive. In the case of developing countries, the exceptions set out in ILO Convention No. 138 (minimum age) apply, according to which, under certain conditions, the employment of persons from 14 years of age is also permitted in individual cases.

Discrimination

No employee may be discriminated against, for example on the basis of sex, race, religion, social class, ethnic or cultural origin, membership of the organization, disability, sexual or political orientation or other personal characteristics.

Freedom of speech, freedom of assembly and association

The Universal Declaration of Human Rights adopted by the United Nations guarantees the protection of freedom of speech. Every employee must be able to freely express and spread their opinion. The ILO Convention also requires freedom of assembly and association of employees.

Inviolability

The personal rights of employees and third parties must not be infringed. They must be protected in their surroundings against physical and mental abuse.

Health and safety

The employer must ensure healthy and safe conditions at every workplace. Workers should be properly trained to reduce the risk of an accident.

STS Logistic is committed to creating healthy and safe working conditions for all of its workers. They are protected from over-exposure to chemical, biological, and physical hazards. Physical hazards include noise, temperature extremes, inappropriate illumination, radiation, ergonomics, air quality, and vibration. Exposure to physically demanding tasks is being evaluated and controlled. Appropriate controls, safe work procedures, preventative maintenance, and protective measures are in place to

reduce health and safety risks in the workplace. We identify and assess emergency situations and minimize their impact by implementing emergency plans and response procedures (including emergency reporting, employee notification and evacuation, worker training, fire detection and suppression equipment, and adequate exit facilities).

Reward

Each employee must receive remuneration for work performed, which will not be lower than the statutory minimum wage applicable in a given country (if it exists). In the absence of a minimum wage, the amount of remuneration should correspond to the level of typical remuneration in the country. Pay reductions, such as disciplinary penalties, are not allowed.

Forced labor

Forced labor is strictly forbidden and not used in the company. Workers must volunteer in the workplace.

Protection of the natural environment

STS Logistic assesses its activity from the perspective of a risk of a negative influence on environment and makes an effort to prevent this risk.

With its environmental management system certified according to ISO 14001, STS Logistic has established an approach, processes and goals to reduce a negative impact of his activity on natural environment (e.g. environmental policy).

STS Logistic observes legal provisions in the range of an impact of his activity on natural environment.

STS Logistic seeks to gain raw materials in a responsible manner, taking care of natural environment and/or to consider environmental criteria in his purchasing decisions.

STS Logistic seeks to reduce consumption of raw materials and natural resources, including water, and to manage them rationally.

STS Logistic seeks to minimize emissions of greenhouse gases, including carbon dioxide, arising directly or indirectly from the supplier's activity within the scope adequate to a scale and type of activity carried out by the supplier.

Counterfeit parts

STS Logistic strictly selects reliable supply partners to cooperate.

Only high-standard distributors who conform our suppliers' standard, such as manufacturers, independent reputable distributors, can be our partner.

STS Logistic does not purchase products from sources other than authorized manufacturers and suppliers. STS Logistic takes every possible precaution to preclude introduction of the counterfeit products into its supply chain through avoidance, mitigation, and disposition processes.

STS Logistic applies its technical staff expertise to the purchase process to assure no counterfeit parts are used within the operations for our customers.

All of the components are inspected and their provenance verified before entering inventory and being applied.

Avoiding conflicts of interest

We make sure that there are no conflicts of interest when making business decisions. An STS Logistic employee should not take part in tasks and should avoid situations that may lead to a conflict of interests, understood as a conflict between the official duty and the private interest of the employee. STS Logistic employees should also avoid situations in which personal interests may improperly affect their performance of official duties. We should not use our position in STS Logistic to achieve personal benefits or benefits for our family members or loved ones. At STS Logistic, we do not tolerate any forms of nepotism or cronyism. It is not recommended to employ in STS Logistic people who are in a family relationship, kinship or affinity with the employee, i.e. spouses, relatives or relatives in a straight line, side relatives to the second degree and side relatives to the second degree, as long as this leads to a relationship or subordination. The relationship or affinity referred to above may affect the impartiality and objectivity of the employee's decisions and actions, and is considered a conflict of interest. In the event of a conflict of interest, an employee should immediately inform his supervisor to find a suitable solution as soon as possible.

Corruption

The criteria for cooperation with external partners are above all: the quality of services as well as professionalism in business relations. Therefore, we do not accept any actions that could have any impact on impartial business decision making. Giving and accepting financial benefits is not allowed. Accepting and giving gifts to business partners is acceptable to the value set by our anti-corruption policy. We try not to accept invitations to entertainment events, informal meetings if it could this will raise our clients' doubts about objectivity. At the STS Logistic, we strive to meet the standards and provisions of international anti-corruption regulations. Protecting the company against the risk of corruption we care about the good image of the company on the international market.

Disclosure of information

We provide high standards of information confidentiality. We only provide information about our employees and contractors to dedicated people, according to strictly established procedures.

We protect confidential information belonging to third parties.

Each of us is responsible for information security inside the company and outside the workplace. We pay special attention to the law regulating the flow of confidential information, which is a business secret. Operating on social networking and social networking sites (Facebook, Twitter), we are required to comply with the information security policy of STS Logistic. We protect confidential and strategic information and prevent its misuse. We develop defense systems against attacks in cyberspace and theft of information.

Intellectual property

The intellectual property rights of our Company (its trademarks, logos, copyrights, trade secrets, know-how) are some of its most valuable assets. Unauthorized use may lead to their loss of value or serious impairment. All use of Company's trademarks and logos must be agreed with the Board of Directors in advance. Any suspected misuse of trademarks, logos or other intellectual property of the Company should be reported to the Board of Directors.

As part of our efforts to ensure that the resources at our employees' disposal are used as intended and protected, we respect the intellectual property rights of other entities.

Protection of identity / privacy

STS Logistic (Company) protects privacy and comply with applicable privacy and data protection laws. It secures Company's data, in accordance with its standards, against unauthorized access and use, and uses Company's personal data only for its own business purposes. Any external use of personal data must be based on a prior explicit consent of the person concerned.

We are aware that the personal data of our customers, employees, suppliers is confidential; therefore, when processing them, we maintain the highest degree of discretion and care to protect them. These efforts are facilitated by technical and organizational measures to ensure the confidentiality of personal data. Each employee is responsible for maintaining a high level of safety in the performance of their daily duties. Employees strictly comply with applicable regulations, respecting the rights of persons whose data we collect, process and use.

Financial Reporting and Account Books

Accurate keeping of records is critical to maintaining the trust of our business partners, making good business decisions and meeting our legal obligations.

We prepare accurate, timely, and complete financial reports and disclosures in compliance with accounting relevant regulatory, accounting and legal requirements. Our financial reporting gives a real picture of the situation, property, financial and performance related results.

We implement our financial responsibility and accuracy of records by:

- We reliably record and report financial transactions and business information in compliance with applicable laws, regulations and accounting practices.
- We use standard contracts and contracting processes or obtain approval for non-standard terms. Our obligations to partners and customers are transparent and understandable, and our written contracts reflect the actual economic conditions of the transaction. We do not conclude side agreements or any other unregistered agreements.
- We only carry out financial transactions with the appropriate authorization and record them in accordance with our company's accounting practices.
- In the document retention and disposal process, we adhere to established information retention requirements that are consistent with our legal obligations and long-term business needs.
- The chief executive officer, chief financial officer, corporate controller and other employees adhere to the financial code of business conduct.
- Once a year, we order an audit at a reputable institution such as KPMG, PWC, Deloitte and audit our financial books and reports.

Fair competition

We believe in the market of open competition. We do not engage in classified and monopolistic agreements.

The company's market activities determine its character. By competing on the market in terms of the quality of services, we cannot afford to risk our reputation. In our business relations, we never allow tricky or fraudulent competition. STS Logistic never benefits at the expense of any entity through unfair commercial practices, providing true information about the quality, function or availability of its services. Furthermore, STS Logistic does not disparage or make false statements about competitors' services. The company gains in customers solely by competing in the quality of its services and staff, no improper market practices are allowed.

Ethics Committee

At STS Logistic an Ethics Committee has been established whose task is to support conduct in accordance with the values and principles of ethics, ensuring an independent and consistent interpretation of the rules set out in the Code of Conduct, the Internal Anti-mobbing Policy, in particular the following issues:

- Providing employees with guidance and advice on ethics and professional behavior;
- Analyzing and advising on internal and external ethical issues raised by stakeholders through available channels, while ensuring confidentiality and preventing retaliation;

- Suggesting amendments to the Code of Conduct, as well as changes to policies, procedures and other instruments that contribute to the improvement of our ethical performance and result from experience gained in implementing the principles as well as from issues identified by stakeholders;

Grievance

STS Logistic has implemented a mechanism to give its stakeholders the opportunity to anonymously submit grievances and concerns (whistle blowing) related to issues defined in the Code of Conduct. Ethics Committee is a dedicated body established to examine such issues.

Following situations can be reported:

- Violation of Human Rights such as freedom of expression, freedom of association, child labor, forced labor, harassment, discrimination, ill-treatment, working conditions, social protection, health and safety rules;
- Situations relating to bribery, conflict of interest, fraud, money laundering or other illegal business practices;
- Situations involving lack of transparency, accuracy, or false statements about financial statements, indicators or general information.
- Inadequacies in the company's procedures or controls;
- Environmental issues such as waste management, energy efficiency and use of natural resources;
- Failure to respect confidential issues, contracts, non-disclosure agreements, etc.;
- Failure to comply with other provisions of the Code of Conduct;
- Asking for advice on any kind of behavioral situation of the requesting employee or others.

All situations reported are reviewed by the Ethics Committee which will ensure confidentiality, and the person presenting the situation will not be subject to any discrimination or retaliation.

Grievance messages by employees, customers, suppliers and other parties can be forwarded using the contact form provided on Company's website http://stslogistic.com.pl/pl/kontakt/zgłoś_naruszenie or directly by e-mail at: komisja.etyki@stslogistic.com.pl

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