



Suppliers Code of Conduct

GIRTEKA GROUP

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Introduction

Supplier Code of Conduct

We prioritize doing the right thing and operating with the highest ethical standards to make a positive impact. Our Supplier Code of Conduct sets clear expectations for our suppliers, aligning their practices with our core values and ethical principles.

Ethical Standards

Suppliers are expected to act with integrity, comply with all applicable laws, and uphold Girteka's ethical standards in all their actions. This includes adhering to policies related to labor rights, environmental sustainability, and fair business practices.

Compliance and Responsibility

While this Code provides a framework, it does not cover every specific situation. Suppliers must ensure they understand and comply with the Code, relevant laws, and additional guidance as required. Violations of the Code or legal requirements may result in corrective actions, including termination of the business relationship.

Open Communication

We encourage suppliers to address issues through open and honest communication. Suppliers must take responsibility for ensuring their operations, and those of their subcontractors, align with Girteka's expectations and values.

By working together, we can maintain ethical practices and foster trust across our supply chain.

1. Working conditions

1. Working Conditions

The Girteka Group is committed to upholding the highest standards in working conditions across its entire supply chain. We require our suppliers to create a respectful, safe, and fair workplace that honors human rights, protects individual dignity, and ensures fair treatment for all workers. These standards apply to all suppliers and their employees, contractors, and subcontractors.

1.1 Compliance with Human Rights and Labor Laws

All suppliers must fully support and comply with the Charter of the United Nations (UN) Universal declaration of Human Rights, the International Labour Organization (ILO) principles, and all applicable national labor laws and regulations. We expect suppliers to treat everyone fairly and without discrimination based on nationality, race, gender, religion, or any other protected status.

1.2 Preventing Modern Slavery and Child Labor

Suppliers must not tolerate any form of modern slavery, human trafficking, forced labor, or child labor within their operations or supply chains. Suppliers should ensure that all work is conducted voluntarily, and workers are free from coercion, exploitation, and restrictions that interfere with personal freedom. No one under the age of 18 should be employed in hazardous work, and any identified instances of child labor must be addressed immediately to prioritize the child's welfare.



1.3 Fair Employment Practices

Suppliers must ensure that all employees have access to fair employment terms, including clearly defined wages, working hours, and conditions that comply with national laws or industry standards. Employment practices such as short-term contracts or day labor must not be used to bypass employee protections or obligations. Suppliers should provide workers with clear, written terms of employment and ensure they have the freedom to leave their employment voluntarily.

2. Occupational Health and Safety

2. Occupational Health and Safety

The health, safety, and well-being of workers are core values at Girteka Group, and we expect the same commitment from our suppliers. Suppliers must prioritize a safe and healthy workplace environment by adopting proactive safety measures, ensuring compliance with relevant safety laws, and continuously working to improve safety standards.

2.1 Health and Safety as a Core Value

Suppliers are required to treat health and safety as central values in all workplace practices. This means making safety an integral part of every decision, action, and policy to minimize risks and ensure that employees work in a secure environment. Suppliers should implement a health and safety management system that identifies and controls potential risks to prevent workplace injuries and illnesses.

2.2 Behavior-Based Safety Policy (BBS)

Suppliers should establish a Behavior-Based Safety (BBS) approach to encourage continuous improvement in workplace safety. This involves actively engaging employees at all levels to identify, report, and address safety risks. Suppliers are encouraged to cultivate a no-blame safety culture where employees feel comfortable discussing and reporting safety issues without fear of retaliation. Regular training sessions and open communication are essential for fostering a culture of safety.



2.3 Reporting and Continuous Improvement

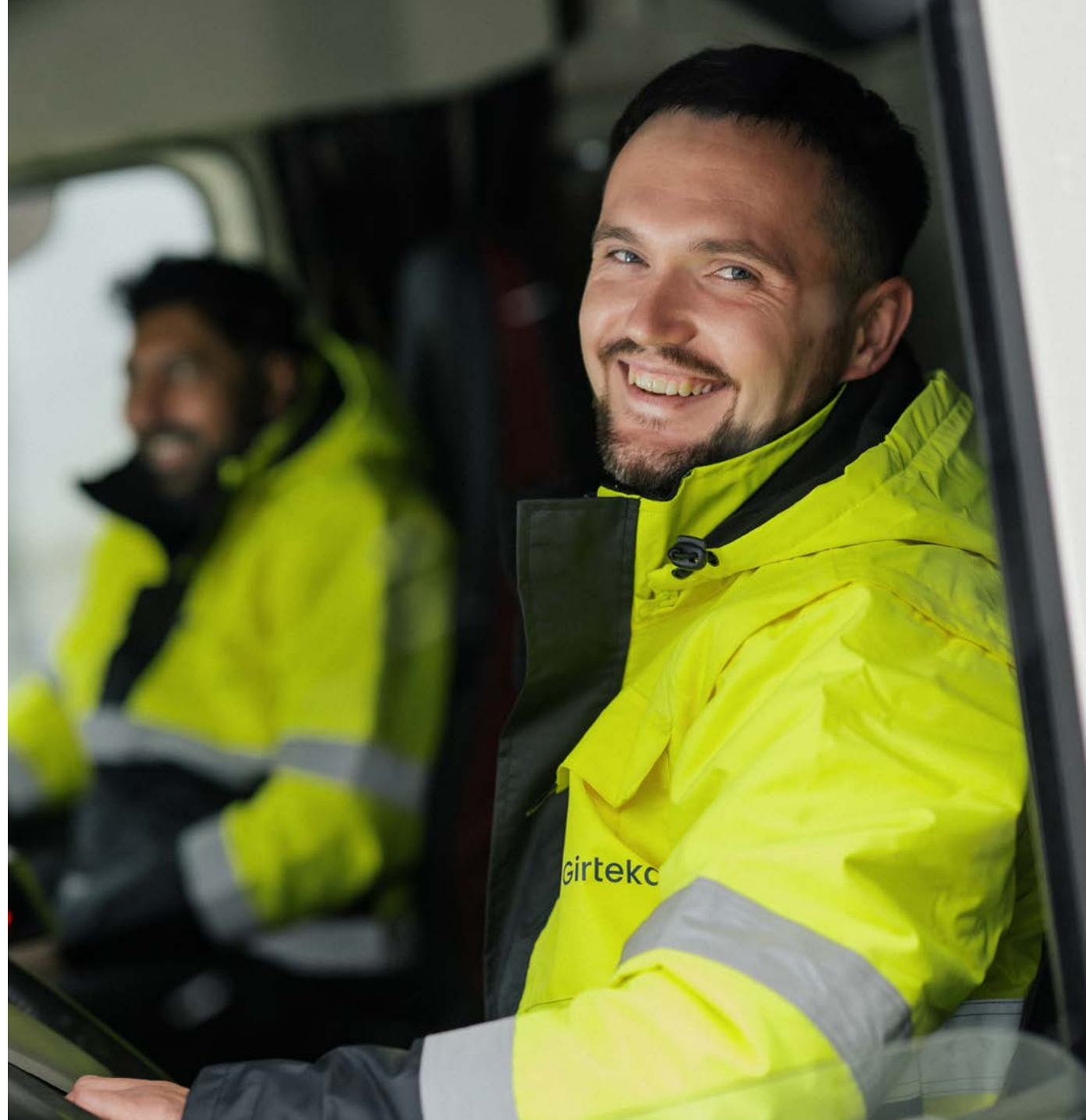
Suppliers must have processes in place for the prompt reporting and investigation of hazards, incidents, and near misses. These reports should be used to implement control measures that eliminate or reduce the risk of recurrence. Suppliers should also perform regular safety audits and set measurable goals to improve their safety standards continuously.

2.4 Personal Protective Equipment (PPE) and Training

Suppliers should provide appropriate Personal Protective Equipment (PPE) and ensure that employees receive training on its proper use. PPE must be maintained and regularly inspected for effectiveness. Additionally, suppliers are responsible for delivering ongoing health and safety training to ensure that all employees understand and follow safe working practices.

2.5 Zero Tolerance for Substance Abuse

To maintain a safe and productive work environment, suppliers must implement a zero-tolerance policy for alcohol and substance abuse within the workplace. This policy should apply to all employees, contractors, and visitors at supplier's premises, and should include measures for education, testing (where legally permissible), and support.



3. Fair Competition

3. Fair Competition

We value fair competition and expect our suppliers to adhere strictly to competition laws. Suppliers must conduct business honestly, avoiding practices that could restrict or distort competition, ensuring a fair and open market environment for all stakeholders.

3.1 Compliance with Competition Laws

Suppliers are required to comply fully with all applicable competition laws, both local and international. This includes avoiding any agreements or practices that may unlawfully restrict competition. Suppliers must refrain from engaging in actions or forming alliances intended to limit competition or unfairly impact market prices and terms of services provided to Girteka Group, and other customers.



3.2 Prohibited Anti-Competitive Practices

Suppliers must not participate in any anti-competitive practices, including:

- **Price-Fixing:** Any formal or informal agreement with competitors to set or manipulate prices.
- **Market Division:** Agreements that divide markets, customers, or regions among competitors.
- **Capacity Limitation:** Efforts to control production capacity to manipulate supply or demand.
- **Bid-Rigging:** Collusion with competitors when submitting bids on projects to ensure an agreed-upon outcome.

3.3 Participation in Industry Meetings

Suppliers are expected to exercise caution when participating in industry meetings, forums, or events where competitors may be present. Discussions about prices, market shares, or other confidential business terms that could be considered anti-competitive are strictly prohibited. If competition-restricting topics are raised in such settings, suppliers should clearly distance themselves from the discussion, leave the meeting, and document their actions.

3.4 Reporting and Seeking Guidance

Suppliers should seek guidance from Girteka Group or their own legal advisors if uncertain about any practices or situations that could violate competition laws. Suppliers are also encouraged to report any observed or suspected anti-competitive behavior within their operations or the supply chain.



4. Integrity, Compliance, and Global Regulatory Adherence

4. Integrity, Compliance, and Global Regulatory Adherence

Girteka Group is committed to conducting business with the highest level of integrity and transparency. We expect our suppliers to adhere to these principles, avoiding all forms of corruption and bribery. Suppliers must comply with all applicable anti-corruption laws and ensure that their business practices are free from unethical influence.

4.1 Compliance with International Sanctions

Suppliers must be fully compliance with international sanctions, trade restrictions, and legislations imposed by governments and international bodies. This includes adhering to all relevant regulations arising from geopolitical events, such as the war in Ukraine. Suppliers must also ensure that their business activities, partnerships, and supply chain operations align with

applicable sanctions regimes, avoiding any prohibited transactions or dealings with sanctioned individuals, entities, or regions. Employees and partners are expected to stay informed and exercise diligence to ensure compliance with these obligations.

4.2 Prohibition of Bribery and Kickbacks

Suppliers must not, directly or indirectly, offer, give, solicit, or accept any form of bribe or kickback. Bribery includes any offer of payment, gift, or service intended to influence the actions of another party improperly. This prohibition extends beyond monetary payments and includes benefits such as travel, entertainment, and other personal or professional advantages.

4.3 Facilitation Payments

Girteka Group maintains a zero-tolerance stance on facilitation payments and any small, unofficial payments intended to expedite routine government actions. Suppliers are expected to



reject all facilitation payments, regardless of local customs or practices, and ensure that their operations are free from such practices.

4.4 Anti-Money Laundering and Prevention of Terrorism Financing

Suppliers are prohibited from engaging in money laundering activities, which include concealing or misrepresenting the origins of funds derived from illegal activities. Suppliers must also avoid any involvement in transactions that could be linked to the financing of terrorism or other criminal activities.

Suppliers should take appropriate steps to verify the legitimacy of their business transactions and report any suspicious activity.

4.5 Compliance and Due Diligence

Suppliers must implement due diligence processes to ensure compliance with anti-corruption and anti-bribery laws throughout their supply chains. This includes training employees and monitoring business practices to identify and prevent corruption risks. Suppliers should also perform checks on third-party business partners to ensure they meet the same standards of integrity.

4.6 Reporting and Accountability

Suppliers are encouraged to report any instances of corruption or unethical practices within their operations. Suppliers should communicate openly with Girteka Group if they encounter any situations that could compromise the integrity of their business practices. Reports can be submitted through designated channels to ensure a secure, confidential process.



5. Gifts and Donations

5. Gifts and Donations

Girteka Group is committed to maintaining an ethical business environment. To avoid conflicts of interest or misunderstandings, we require our suppliers to adhere to strict standards regarding gifts and donations. Suppliers must ensure that all business practices align with Girteka Group's "No Gift" policy to prevent any appearance of undue influence or impropriety.

5.1 No Gift Policy

Suppliers must not offer or accept gifts, hospitality, or any other benefits that could be perceived as an attempt to influence business decisions or gain a favorable advantage. This policy applies to all forms of gifts, including food, beverages, entertainment, and other incentives, regardless of value. Any promotional items that suppliers provide should be of nominal value and align with standard business practices.

Exceptions could be applicable only for marketing materials with minimal monetary value (such as pens or notepads bearing a company logo).

5.2 Charitable Donations and Sponsorships

Suppliers are encouraged to support charitable causes and community initiatives ethically and transparently. However, any donations must not be used as a means to gain business advantage or influence stakeholders. All charitable contributions should comply with national legislation, be properly documented.



6. Conflicts of Interest

6. Conflicts of Interest

We believe in conducting business with impartiality and integrity. We expect our suppliers to avoid any conflicts of interest that could compromise, or appear to compromise, their ability to make fair and objective decisions in their business dealings with Girteka Group.

6.1 Avoiding Conflicts in Business Transactions

Suppliers must avoid any situation where personal or financial interests could interfere with their obligations to Girteka Group. Suppliers are expected to act in the best interest of Girteka Group and ensure that their business decisions are free from external influence. This includes abstaining from transactions with Girteka Group or its affiliates in which a supplier or their immediate family members have a personal interest.

6.2 Reporting Relationships and Related Parties

Suppliers must ensure that decisions regarding appointments, promotions, or transactions are based solely on qualifications, performance, and the needs of the business. Suppliers should implement measures to prevent conflicts arising from direct or indirect reporting relationships between family members or close associates. Suppliers are also encouraged to prohibit financial transactions, such as loans, with employees and related parties, as these could create undue influence or conflicts.



6.3 Transparency and Disclosure

Suppliers are expected to proactively disclose any potential conflicts of interest to Girteka Group. If a supplier identifies a conflict, or if there is any doubt about whether a situation may constitute a conflict of interest, they should seek guidance from Girteka Group to resolve the issue appropriately. Transparent communication is essential to maintaining trust and ensuring fair and ethical business practices.

7. Processing of Information

7. Processing of Information

Girteka Group values the integrity, confidentiality, and security of all information handled within its business network. We require our suppliers to protect sensitive and confidential information and to process data responsibly and in compliance with applicable privacy laws. Suppliers must align their information practices with Girteka Group's standards to maintain trust and safeguard sensitive information.

7.1 Confidential Information and Proprietary Materials

Suppliers must treat all non-public information about Girteka Group, its employees, customers, and partners as confidential. This includes business strategies, financial data, trade secrets, and any proprietary information shared during the course of business. Suppliers must not disclose such information to unauthorized parties and should only share it with those who have a legitimate business need to know.

7.2 Data Privacy and Protection

Suppliers are expected to comply with all relevant data protection laws, including the EU's General Data Protection Regulation (GDPR) where applicable. This includes implementing binding corporate rules/data protection procedures/policies that protect personal data from unauthorized access, misuse, or disclosure. Suppliers should take all necessary steps to ensure that data processing, storage, and transfer are conducted lawfully, fairly, and transparently, respecting the privacy rights of all individuals.



7.3 Loyal Conduct and Responsible Communication

Suppliers are expected to support Girteka Group's business strategy and corporate values in their communications and conduct. When speaking publicly or engaging in online forums, suppliers should avoid making statements that could damage Girteka Group's reputation. Suppliers must refrain from disclosing any confidential information and ensure that all communications are responsible and respectful of Girteka Group's brand.

7.4 Reporting Data Incidents

In the event of a data breach, security incident, or unauthorized access to confidential information, suppliers must notify Girteka Group immediately. Prompt reporting allows for a coordinated response to mitigate potential harm and uphold data security standards.



8. Environmental Responsibility

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We are committed to minimizing our environmental impact and promoting sustainable practices. We expect our suppliers to share this commitment by adopting environmentally responsible practices in their operations, aligning with Girteka Group's environmental goals, and continuously seeking ways to reduce their environmental footprint.

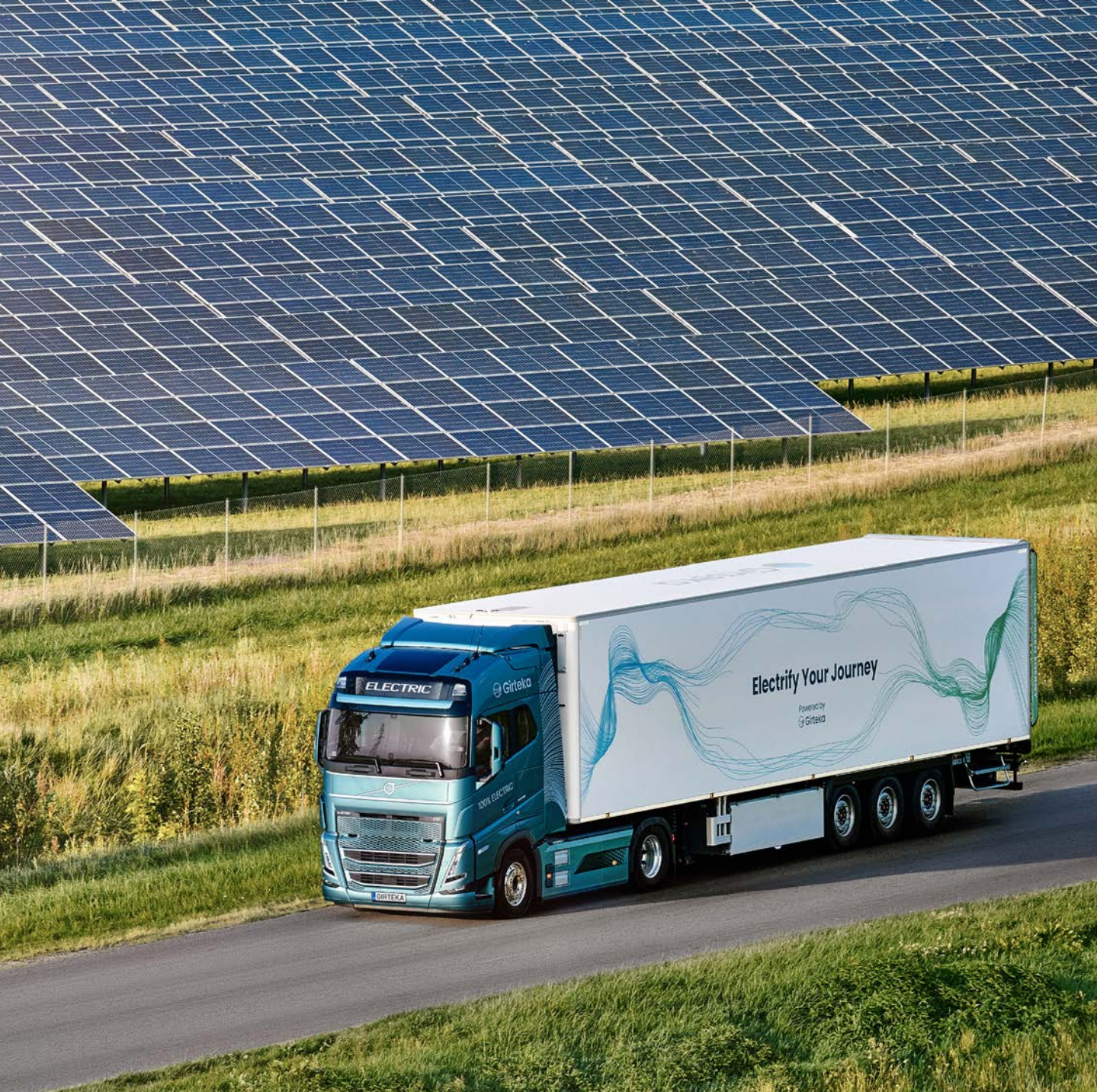
8.1 Sustainable Practices and Pollution Reduction

Suppliers must take proactive steps to minimize pollution, reduce CO² emissions, and manage waste responsibly. This includes adopting practices that reduce environmental harm, conserving natural resources, and improving energy efficiency. Suppliers are encouraged to use sustainable materials, recycle whenever possible, and minimize waste generation throughout their operations.

8.2 Compliance with Environmental Legislation

Suppliers are required to comply with all relevant environmental laws and regulations in the regions where they operate. This includes adhering to regulations for waste disposal, emissions, and hazardous materials handling. Suppliers should stay informed of any updates to environmental laws and ensure their practices remain compliant.





8.3 Collaboration on Environmental Goals

We encourage our suppliers to work closely with Girteka Group in achieving shared environmental objectives. Suppliers should participate in initiatives that promote eco-friendly logistics solutions, such as green procurement criteria and sustainable transportation options. By collaborating with Girteka Group, suppliers can contribute to our collective efforts to reduce environmental impact and promote a more sustainable supply chain.

9. Compliance with the Code of Conduct

9. Compliance with the Code of Conduct

Adherence to this Code of Conduct is essential to maintaining a responsible, ethical, and transparent relationship with Girteka Group. We expect all suppliers to integrate these principles into their operations, ensuring that their actions align with the values and standards outlined by Girteka Group.

9.1 Responsibility for Compliance

Suppliers are responsible for ensuring that their employees, contractors, and subcontractors understand and comply with the Supplier Code of Conduct. This includes implementing training and monitoring procedures to uphold the standards outlined in this Code across their entire operation.

9.2 Reporting Violations

Suppliers are encouraged to report any observed or suspected violations of the Code of Conduct promptly. Any breaches or unethical practices within their organization, or involving their contractors or subcontractors, should be disclosed to Girteka Group through designated reporting channels. Confidential reporting mechanisms, such as Girteka Group's Whistleblower Program, are available for those needing anonymity.



9.3 Consequences of Non-Compliance

Failure to comply with this Code of Conduct may result in corrective actions, up to and including termination of the business relationship with Girteka Group. Suppliers should view adherence to these standards as integral to their partnership with Girteka Group, and we strongly encourage a proactive approach to continuous improvement and ethical responsibility.

Responsible Logistics

