

Raben

RABEN GROUP CODE OF ETHICS



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**YOUR PARTNER
IN LOGISTICS**

CEO LETTER

As a large business operating on the world stage, we are aware that we don't operate in an isolated social space. Each day we want to set sustainable trends in the industry which bring additional value to the environment. We also want to continuously support international efforts to shape the sustainable economy, hence our willingness to support the UN sustainable development goals. We believe that achieving this vision is not possible without an ethical approach to doing business.

In Raben Group we pay special attention to reliability and responsibility. In everyday business practice, we avoid ethically ambiguous situations, and we act accordingly in all relationships at every stage of the value chain. We strive to create a work environment where open and honest communication is a norm, not the exception. Our organizational culture, shaped over the years by the dimension of ethics and values, is entering the next level. We believe that the pace of social and economic changes and challenges of the modern world is not without an impact on the

gene of ethics in our company DNA. We believe that by drawing on and taking inspiration from such guidelines and recommendations as:

- United Nations:
 - Guiding Principles on Business and Human Rights,
 - Ten Principles of the Global Compact,
 - Agenda for Sustainable Development 2030,
 - OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,
- each day we take the right decisions navigating the path of ethics and dilemmas related with it.

I am proud to present to you the updated content of the Raben Group Code of Ethics. Each of you should read its content. Personally, I believe that you will treat the directions outlined herein as a kind of guide supporting your daily choices when performing your tasks. I trust that the Code of Ethics will also be a lasting commitment of the whole Raben Group towards our employees, customers, drivers, subcontractors, business partners, the natural environment, local communities and the media.

As the CEO of Raben Group I pledge to make every effort to ensure that the provisions of this Code of Ethics are permanently inscribed in the organizational culture of our company.

Ewald Raben

CEO Raben Group



PRINCIPLES WHICH UNDERPIN OUR ETHICAL CULTURE

Somebody once said that in looking for people to hire, you look for three qualities: integrity, intelligence, and energy. And if you don't have the first, the other two will kill you

Warren Buffett

Every day in Raben Group we strive to develop an ethical culture at all levels of management. The key principle in this area is to conduct business activity in full compliance with applicable law as well as industry standards. To this end, Raben Group has implemented, among other things, procedures concerning compliance with regulations and international standards of ethics, regarding anti-trust, anti-corruption, smuggling of both people and goods. We strive to build a workspace and cooperation based on our corporate values. In everyday choices they are a signpost that supports decision making in building a socially responsible business. We value the diversity and multitude of views which are present in Raben Group, and we respect and accept different political and religious views of our employees. We respect the rights of individuals, we anticipate the consequences of our actions, and we meet the deadlines for meetings, contracts and payments. We do not directly or indirectly support political parties or individual politicians.

OUR COMMITMENTS TOWARDS EMPLOYEES

*I have often noticed that a bribe has that effect – it changes a relation.
The man who offers a bribe gives away a little of his own importance;
the bribe once accepted, he becomes the inferior (...).*

Graham Greene

Human rights

- a) We share the belief that human rights are universal, indivisible, interdependent and interrelated and that all people have the right to be treated with dignity and respect, regardless of, among other, their gender, race, disabilities, place of birth, place of residence, ethnic or social background.
- b) We oppose all forms and instances of human rights violations within our organization and throughout the entire supply chain. We are committed to respecting human rights, as defined by International Bill of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work, for our employees and all affected groups, regardless of the location or scope of Raben Group business activity.

Forced Labour

- c) At Raben Group we do not use any form of forced labour. We do not use slave labour, forced labour, prison labour. The employment of workers is free of any form of threats or coercion, including blackmail, in particular through retention of personal documents or work permits. We do not require our employees to make financial deposits or deposit personal documents or other valuable personal possessions, and all employees have the right to terminate their employment with appropriate period of notice, in accordance with legal and local labour regulation.

Child Labour

- d) At Raben Group we are committed to complying with the International Labour Organisation (ILO) regarding child labour including ILO Minimum Age Convention (Convention 138) and ILO Worst Forms of Child Labour Convention (No. 182).

Raben Group do not employ workers below the minimum working age permitted by local law or as defined by the ILO Conventions mentioned above, whichever is stricter. Where lawful employment of juvenile workers is permitted by local law, Raben Group ensures compliance with the relevant regulations specifically regarding the permitted working hours, remuneration and occupational safety standards.

Raben Group avoids hiring individuals under the age of 18. In strictly justified cases, exceptions may apply for individuals aged 16 or above, but only under precise conditions and in compliance with local laws. In such situations individuals are not allowed to perform hazardous work, in line with applicable ILO Conventions.

Employment and working conditions

- e) Raben Group guarantees that employment conditions—including wages (which must meet or exceed the living wage as defined by applicable laws and regulations), working hours, and additional benefits for a standard working week—comply with national legal requirements, industry norms, and applicable international standards. At the start of employment, employees receive clear and accessible information about their terms of employment, including their rights, responsibilities, working hours, salary, payment procedures, and settlement modalities. Wages shall never be unlawfully reduced or deducted under any circumstances.

As a European transport and logistics services provider we feel particularly committed to ensuring good working conditions for all truck drivers. Therefore, we endorse Truck Transport Social Guidelines and agree to cascade them through our supply chains, meaning that the same standards shall be applied to our subcontractors.

Freedom of association and right to collective bargaining

- f) At Raben Group dialogue is a key instrument of collaboration. We ensure that the employees have the right to engage in collective bargaining, and participate in dialogue with the Management Board, its proxy, or a representatives of the Management. In regions where local law restricts freedom of association and collective bargaining, Raben Group supports employees in developing alternative mechanism to ensure their voice are heard.

Dialogue is conducted in an environment free from discrimination, retaliation or harassment. Employees are informed of their freedom to undertake representative and organizational roles in the workplace without fear of negative consequences.

Land Rights and Forced Evictions

- g) At Raben Group, we respect the rights of local communities, including the rights of Indigenous people to decent living conditions; education, employment, and social activities; and the right to Free, Prior, and Informed Consent (FPIC) to developments that affect them and the lands on which they live. We do not accept forced eviction and the deprivation of land, forests, and waters in the acquisition, development, or other use of land, forests, and waters.

Private or Public Security Forces

- h) The protection of Raben Group property and assets, including those entrusted to us by Customers and business partners, is a top priority. However, we recognise that this obligation must be balanced with a commitment to respecting human rights. We are therefore committed to ensuring that we do not use private or public security forces in ways that could lead to human rights violations due to e.g. inadequate training or lack of oversight.

Occupational health and safety

- a) Safety of employees and all participants of logistics and transport processes is non-negotiable. A component of people's safety is not just compliance with the law and rules, but also daily building sensitivity to risks in the workplace. We strive to ensure that each employee takes care of his or her own safety, safety of his or her colleagues and other people involved in Raben processes. That is why, our employees are aware that they must not perform works which pose a direct, serious threat to their life and health.
- b) At Raben Group, in accordance with the safety culture, we care about the health and safety of employees and subcontractors. We strive to ensure a safe work environment based on regular identification, analysis and reduction of risk factors in our work environment. We are taking action to achieve zero accidents.

- c) At Raben Group we ensure proper sanitary conditions in the workplace by providing access to drinking water, proper hygienic conditions in places where meals are prepared, proper quantity of clean toilets and washbasins and in case of providing employees and subcontractors, with accommodation: proper living space, safety, cleanliness, heating and ventilation.
- d) At Raben Group we provide proper and safe infrastructure. We strive to ensure that vehicles, machinery and equipment used by employees and subcontractors as well as the surrounding infrastructure are regularly inspected and equipped with appropriate safeguards.
- e) Raben Group undertakes preventive actions aimed at eliminating or minimizing risks of accidents at work and occupational diseases. Our aim is to build the awareness among employees and subcontractors of the existing risks and how to prevent them. We provide trainings in occupational health and safety systems and safety culture tailored to the nature of the performed work.
- f) At Raben Group we make sure that employees and subcontractors perform their duties in accordance with the requirements of the Golden Safety Rules (Appendix no 1 to the Code of Ethics). That is why, among others, we do not allow them to consume alcohol, use psychoactive and intoxicating substances at work or during a period that could cause the effects of these substances to persist until the time of commencing professional activities.
- g) At Raben Group, safety leadership is embedded in the actions of the Management. That is why, in each Raben company we have appointed a representative of the management responsible for building the safety culture and an OHS team in compliance with the local law requirements.
- h) Raben Group has implemented behaviour management through safety talks because it is aware that behaviours and technical conditions are the most frequent causes of accidents.

Equal treatment and non-discrimination

- a) At Raben Group we undertake to follow the principles of equal treatment and counteract all forms of discrimination. We do not accept any form of discrimination or unequal treatment, in particular based on age, gender, religion, disability, sexual orientation, skin colour, marital status, pregnancy, parental status, political opinion, nationality, ethnic origin, union membership or social status.
- b) At Raben Group we condemn all behaviours which are disrespectful to the other person and exploit their lower position or vulnerability. We do not allow for any forms of mobbing, harassment, violation of personal dignity and behaviours creating an intimidating, hostile, degrading, humiliating or offensive atmosphere in the workplace.
- c) At Raben Group we do not accept any discrimination or unequal treatment in relation to employee recruitment, access to trainings, promotions, salaries, dismissals or retirement.

Confidentiality

- a) At Raben Group personal data protection and information security have always been a priority. We are aware that information is of critical value and it constitutes a resource which requires appropriate protection, hence we abide by personal data protection regulations, including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR).
- b) At Raben Group, we use data obtained in our daily business activity only to the extent necessary to perform business processes. We protect information, which is the company property, including but not limited to intellectual property, as well as that belonging to its employees, customers, partners, subcontractors and other cooperating entities.

Fair competition

We recognise that free and fair competition is essential for the long-term success and sustainability of our business. Therefore, we actively support and comply with all relevant legal frameworks that protect competition, including those that prohibit price and bid rigging, quota agreements, subdivision agreements, discriminatory agreements, tying agreements, boycott, and any other practices that may negatively impact fair competition.

Conflict of interests

Employees and associates working for Raben Group based on agreements other than employment contracts should avoid acting in conflict of interest meaning in a situation where personal relationships (including those of close family members/friends) or personal interests, including financial, in a public institution, another company, business or venture may – even seemingly – influence the decisions made in their professional life.

In case where a real or potential conflict of interest arises, an employee or an associate should inform about it Raben Group Risk Director and withdraw from any decision-making process that the conflict of interest can concern.

Export Controls and Economic Sanctions

As a multinational enterprise, Raben Group is committed to conducting our operations in accordance with applicable export control regulations, economic sanctions (defined by the Security Council of the United Nations, the US, the European Union or any of its member states, including without limitation The Netherlands, Poland and Germany, the United Kingdom and the governments and official institutions or agencies of any of mentioned above, including OFAC, the Council of the European Union, the US Department of State, and Her Majesty's Treasury), embargoes and other trade restrictions. To ensure the compliance with sanction-related regulation, we have established a comprehensive Sanctions Compliance Policy that applies to all Raben Group companies.

Fraud, anti-money laundering, countering the financing of terrorism

Raben Group does not tolerate fraud, tax evasion, money laundering or financing of terrorism. To ensure integrity we promote measures driven by prevention, awareness, and accountability. Moreover, to ensure compliance we implement local anti-money laundering (AML) internal procedures, and we expect all employees to act honestly and accurately and to demonstrate diligence in all aspects of their activities.

Counteracting corruption

- a) At Raben Group we comply with the anti-corruption laws, standards, regulations, guidelines with respect to all activities related to everyday business practice and business ethics.
- b) Raben Group applies a principle of zero tolerance for corruption. Employees and partners are not allowed to, in an unlawful or immoral manner, influence existing or potential counterparties as well as public officials, through preferential treatment, giving presents and other material or personal benefits.
- c) Specific rules on preventing and counteracting corruption are contained in the Raben Group Anti-corruption Policy. On a local level, the Raben Group Anti-corruption Policy is supplemented by anti-corruption sets of rules (manuals) applicable in respective jurisdictions in which Raben Group operates.

Offering and accepting gifts

- a) At Raben Group we can offer and accept gifts or entertainment in the context of business not involving public officials of a gross value not exceeding EUR 50 (regarding gifts) and EUR 100 (in respect of entertainment) per person per year. Offering or accepting gifts of a value above EUR 50 and entertainment above EUR 100, are subject to the approval of the Group Chief Financial Officer after receiving recommendation from the Risk Director. The requests for approval of costs exceeding EUR 50 (gifts) or EUR 100 (entertainment) per person respectively must be sent to the Group Compliance Officer acting in his/her capacity of the Risk Director.
- b) In accordance with the above provisions, it is allowed in Raben Group to accept only small, advertising gifts and gifts or entertainment customary for the culture of the region or country, in accordance with the above provisions, provided that their presentation does not influence the decisions made and it does not oblige to reciprocate in the future.
- c) At Raben Group it is not allowed to use the company standing, function or held position to obtain preferential conditions for tangible and intangible personal purposes.
- d) At Raben Group, employees responsible for the selection of any service or product are guided by factors known to bidders, which include, among others: quality, competitiveness of the offer, reliability and responsibility of the bidder.
- e) Specific rules regarding offering and accepting gifts and entertainment in Raben Group are provided for in the Raben Group Gifts and Entertainment Policy being a part of Raben Group Anti-corruption Policy. Should these rules be more stringent in specific jurisdictions in which Raben Group operates, they must be applied.

OUR COMMITMENTS TOWARDS CUSTOMERS

*Respect the truth so that your words are more **RELIABLE**
than other people's promises.*

Socrates

- a) At Raben Group, reliability determines fair and ethical behaviour towards our customers. We are guided by our values in our daily cooperation with customers. We strive to meet our customers' requirements at every stage of the provided logistics services.
- b) At Raben Group we are committed to work hard to create our customers' competitiveness, through cost and quality leadership supported by friendly service.
- c) At Raben Group we focus on partnership and transparent relations with customers. In our daily practice and business relations, we conduct an open dialogue with our customers. We are constantly improving our processes and services through customer feedback.
- d) At Raben Group we undertake to raise awareness of our employees, partners and subcontractors regarding the requirements and expectations of our customers.
- e) At Raben Group we are committed to continuous improvement of processes through integrated management systems implemented in particular companies.

OUR COMMITMENTS TOWARDS SUBCONTRACTORS AND BUSINESS PARTNERS

*Friendship rises from many sources,
the biggest of which is RESPECT.*

Daniel Defoe

- a) At Raben Group we focus on partnership and lasting relations in business. In our daily practice and business relations, we are committed to an open dialogue free of all forms of discrimination and prejudice.
- b) At Raben Group, we undertake to implement and comply with the provisions of this Code of Ethics as a manifestation of partnership, transparency and social responsibility towards our suppliers and business partners. We believe that it is only through bilateral responsibility, which is also reflected in our expectations of our subcontractors, that we are able to respond to market needs and shape business cooperation based on values and ethical principles.
- c) We are committed to transparent, open, and honest communication with our customers, business partners, and employees. We ensure that all communication is timely, clear, and conducted with respect and professionalism. We expect our suppliers to uphold the same high standards of communication.

OUR COMMITMENTS TOWARDS THE NATURAL ENVIRONMENT

Imagination is more important than knowledge.

Albert Einstein

- a) At Raben Group we undertake to comply with international rules and laws on environmental protection. We also undertake to continuously monitor and report the environmental impact of our activities.
- b) At Raben Group we are committed to minimising consumption of raw materials, reducing CO2 emissions and other air pollutants, and ensuring responsible waste management. By conserving natural resources, measuring and reporting emissions, reducing our environmental impact, and protecting biodiversity and ecosystems, we actively contribute to the common good.
- c) At Raben Group we undertake to prevent environmental failures and to continuously reduce our environmental impact. And in situations of potential failure, to pay special attention to minimizing its impact on the environment.
- d) At Raben Group we undertake to raise awareness of and promote pro-ecological attitudes among managers, employees, co-workers, customers, drivers and business partners.
- e) At Raben Group we undertake to invest in the construction and expansion of logistics parks and warehouses taking into account ecological and intelligent standards of modern construction.
- f) We also promote eco-friendly solutions among our business partners. We encourage our carriers to invest in and develop low-carbon transport fleets. We support them by intermediating and offering them preferential conditions for such investments. We invest in modern trailers allowing for minimizing environmental costs and we encourage our customers to carry out their own processes in a way that will allow for effective use of these means of transport.

OUR COMMITMENTS TOWARDS LOCAL COMMUNITIES

*Nothing astonishes men so much as common
sense and plain dealing.*

Ralph Waldo Emerson

- a) At Raben Group we pledge to support local communities in the area of road safety, logistic education and ecology.
- b) At Raben Group we make efforts to conduct regular dialogue with local communities on the impact of our activities on the local environment. We continuously strive to establish an information exchange system as part of the consultation program and inform interested target groups about the possibility of active involvement in the decision-making process.

OUR COMMITMENTS TOWARDS THE MEDIA

*Our span of life is brief, but is long enough
for us to live well and honestly.*

Cicero

- a) At Raben Group we pledge to regularly inform and answer questions from the media. Contact with the media is the responsibility of designated persons and only they are authorized to speak on behalf of the company and provide information about Raben Group.
- b) At Raben Group we undertake to transparently communicate our impact on the economy, employees, local environment and the natural environment. Communication will take place through traditional and modern communication channels.

HOW WE MANAGE ETHICS

Compliance with the provisions of the Code of Ethics is mandatory for all Raben Group employees in different positions, regardless of contracts and roles within the organization. A representative of the top management responsible for compliance with this Code has been appointed in Raben Group - it is the Risk Director. Moreover, for each company, a person responsible for the implementation of business ethics standards and compliance has been appointed.

Reporting

Each person that obtained an information on violations of the law, internal regulations or ethical standards adopted by the Raben Group Companies in a work-related context can confidentially report possible violation (both in local and English language) through:

Group mechanism created by Raben Group using:

- dedicated platform - [Ethic Point](#)
- dedicated [hotline](#)
- letter (Internal Audit Department, Raben Management Services sp. z o.o., Zbożowa 1, 62-023 Robakowo).

Internal channels created by each Raben Group Company, indicated in Companies' Whistleblowing Procedures.

Reports can also be filed anonymously.

Protection of the Whistleblower

The Whistleblower is protected from retaliation from the time the report is filed, provided that the Whistleblower had reasonable grounds to believe that the information that is the subject of the report was true at the time the report was filed and that it constitutes information on a violation of law, internal regulations or ethical standards adopted by Raben Group companies.

Whistleblowing procedures

To learn more about our whistleblowing standards, please see Raben Group Companies' Whistleblowing Procedure.

Additional Information

Raben Group reviews the Code at least biennially to ensure its compliance with the current legal regulations and applicable standards. The Risk Director is accountable for reviewing and updating the document.

Raben Group will inform all employees of all changes via existing communication channels.

Training

Promotion of ethical practices is one of the priorities of Raben Group's Strategy. Therefore, Raben Group commits to train its employees on a regular basis on ethical related topics.

GOLDEN RULES OF SAFETY

Must be applied to everybody: employees, contractors, service suppliers and visitors.

1. Respect the basis:

- Turn up fit and ready for work and unaffected by psychoactive and abusive substances or alcohol
- Do pre-job check
- Stop work that is unsafe
- Have the right tools and equipment and ensure that these are in good condition
- Know what to do in an emergency
- Operate machinery (including robots) only if you are aware of the risks and know how to operate them safely
- Protect the environment:
 - Segregate waste generated at our terminals
 - Conserve water and electricity
 - Do not pollute groundwater or rainwater by releasing chemicals
 - Repairing and washing vehicles is prohibited at terminals except for vehicle service stations

2. Personal Protective Equipment:

- Know how to use personal protective equipment (PPE). Use PPE in accordance with the requirements described on notice boards at terminal entrances and in particular work areas
- Wear and use Personal Protective Equipment (PPE) that is appropriate for tasks and in good condition
- Minimum requirements in Raben Group regarding this area:
 - Truck yards at terminals: reflective vest
 - Cross-dock and contract logistics warehouses: reflective vest, safety boots and hard hat
 - Other processes: according to the information provided at the process location

3. Fire protection and first aid:

- Follow the fire protection procedure
- Smoke (also e-cigarettes) only in designated smoking areas
- Allow the access to fire protection equipment and to emergency paths
- Respect the ban on blocking of fire gates
- If the alarm is sounded, head for the nearest emergency exit following the escape route signs and proceed to the designated assembly point. Follow the instructions of the Evacuation Coordinator
- In the event of an injury, contact the designated first aiders - details on the notice board in your workplace

4. Traffic (machinery, vehicles, pedestrians):

- Obey traffic regulations both on and off-site
- Obey the speed limit and buckle your seatbelt (maximum speed in truck yards – 20 km/h, in warehouses – 10 km/h)
- Use machinery adequate to the type of product transported
- Respect the ban on using mobile phones/ smartphones / other mobile devices while driving or walking in the warehouse
- Strictly follow all binding legal regulations related to using mobile phones and other equipment while driving on the road
- Be particularly careful while using a hands-free set while driving
- Keep a safe distance between your vehicle and other vehicles or pedestrians
- Take special precautions when driving conditions are hazardous
- Pull over when you are fatigued
- Pedestrians - use the paths provided and respect the rule not to hurry, and give way to forklifts moving around the warehouse

5. Reporting of danger:

- Immediately report all (injuries, road accidents, environmental hazards, fires and near-misses) to your supervisor, the OHS Coordinator, or another Raben employee
- Consider health impact of every task
- Look out for the hazards; don't pass them by
- In case of change of organization, equipment, plant, process:
 - Check if it is justified and authorized
 - Check if the situation is reassessed if there is an unexpected change in circumstances
 - Discuss changed conditions at daily pre-start meetings

6. Safe work requirements:

- Work safely
- Adhere to safe methods & requirements
- Keep your work area tidy
- In case of manual handling – assess the limits of weight and size for lifting, pushing, pulling by one person
- Make sure machinery and vehicles are suitable for the intended use, inspected and authorized for use
- Apply ergonomic rules
- Know how to handle, store and dispose of any chemicals or hazardous substances you are working with
- Ensure that all energy sources have been safely isolated and energy released before working on equipment
- Report changes in work processes to minimize the risk of accidents and occupational diseases
- If you are not an employee of a Raben Group company, get to know the OHS Coordinator in your work area and the scope of their authority, follow their instructions. Details of the OHS Coordinator are available on the notice board

7. Training:

- Have required mandatory training
- Instruct visitors, subcontractors and other person entering our processes
- Collect records of trainings
- Share our experience and knowledge with others
- Check important OHS information on the notice board – general OHS rules for the particular area

8. Work at height:

- Use personal fall protection equipment (e.g., helmet, harness) if collective protective measures are not available
- Work on a roof – carry out a prior inspection, a specific risk assessment and installation of catwalks, safety rails or lifelines
- Be certified & trained, equipped with personal protective equipment when using Mobile Elevated Work Platforms
- Use only authorized equipment to lift people
- Ladders may only be used as a means of access under exceptional circumstances

9. Lifting and mechanical handling (tools & equipment):

- Check tools and equipment before using. They must be proper for the task, in particular the maximum weight and type of the load
- Check if equipment is in good condition
- Report any noticed defect o equipment
- Secure cargo properly
- Make sure that you or others are not in the fall zone of equipment and lifted cargo

10. Work permits:

- Know which works require specific permits, particularly:
 - hot work (of welding, flame cutting, grinding)
 - electrical work
 - work involving the use of dangerous substances
 - maintenance operations which compromise critical safety systems or which remove them from service, e.g. fire and gas detection systems
 - work in confined spaces, wells, canals, tanks
- You can only perform these works with a valid permit. If in doubt, consult your supervisor. Obtain a new permit if the scope of work or conditions changed
- Follow the instructions specified in the permit

Raben

WE PLAY FAIR

**YOUR PARTNER
IN LOGISTICS**