

**Raben**

# CODE OF ETHICS FOR RABEN GROUP SUPPLIERS



Date of issue: Dec. 2020  
Version 3.0  
Last review: 01.12.2024

**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 business ethics and abiding by the highest standards by and in cooperation with our suppliers.

In Raben Group we pay special attention to reliability and responsibility. In our daily business practice, we cooperate with many suppliers. The partners conducting business activities for the benefit of Raben Group are an important link in the entire value chain. Thus, the partnership gains a new, wider dimension. A dimension with clear commitment to business integrity and built on the foundation of dialogue, principles and ethics of cooperation.



I am proud to present the updated version of the Code of Ethics for Raben Group Suppliers. This document has been inspired by such guidelines and recommendations as

- United Nations:
  - Guiding Principles on Business and Human Rights
  - Agenda for Sustainable Development 2030
  - Ten Principles of the Global Compact
- OECD: Guidelines for Multinational Enterprises on Responsible Business Conduct

and it aims to assist in meeting their requirements. In practice, the Code of Ethics sets minimum rules of conduct that Raben Group expects from its suppliers. I firmly believe that the directions outlined here will be a source of inspiration and measurable help in the daily choices of our suppliers. Acceptance of this Code is the supplier's commitment that all current and future arrangements and business relations with Raben Group will be consistent with the guidelines contained herein. I assure you that every employee of Raben Group, who is responsible for shaping relations with our suppliers daily, is committed to the principles described in this document.

**Ewald Raben**  
CEO Raben Group

A handwritten signature in black ink that reads "Ewald Raben". The signature is written in a cursive, flowing style.

# INTRODUCTION

## GENERAL REQUIREMENTS

*If you don't have the laws of morality in your heart,  
you will not find them in books.*

Charles de Montesquieu

### **Purpose**

The purpose of the Code of Ethics for Raben Group Suppliers ('the Code') is to provide our suppliers and subcontractors, and their employees with the non-negotiable requirements on ethical business conduct.

### **Scope**

This Code applies to all Raben Group suppliers, service providers and subcontractors, including, but not limited to, carriers, employment agencies, and construction companies ('Raben Group Suppliers' or 'Suppliers'). It also applies to all indirect suppliers or partners that are performing services on behalf of any of Raben Group companies.

### **Implementation**

This Code and potential, associated sustainability performance is an important indicator in the qualification and evaluation process of Group suppliers and compliance with this Code is a prerequisite for doing business with Raben Group companies. Raben Group Suppliers are responsible for ensuring that its employees, representatives and suppliers comply with this Code.

Raben Group acknowledges its responsibility to support suppliers in meeting ethical standards. If any violations or non-compliance are identified, Raben Group strives to work with the Suppliers to implement corrective actions. However, in exceptional cases—such as serious violations or instances where the business partner fails to act or is unwilling to implement corrective measures—the Group reserves the right to terminate the contract.

We expect our suppliers to communicate transparently, openly, and honestly with all stakeholders, including customers, business partners, and employees. Communication should be timely, clear, and conducted in a respectful and professional manner, reflecting the highest standards of integrity.

### **Legal compliance**

Raben Group Suppliers must comply with all applicable legal regulations, international standards of ethics and Raben Group procedures. Conducting business activities based on the provisions of applicable law is a non-negotiable and key value for undertaking and/or continuing business cooperation.

# PEOPLE

## **Human rights**

As Raben Group, we recognise that respecting human rights and labour standards within the entire supply chain is not only an aspiration but is an integral part of every business operation. Therefore, Raben Group Suppliers must respect in their operations and supply chains all human rights and labour rights, as defined by International Bill of Human rights and ILO Declaration on Fundamental Principles and Rights at work. Additionally, we expect that Raben Group Suppliers follow international standards, including: UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, Ten Principles of the UN Global Compact.

## **Forced labour**

Raben Group Suppliers and their contractors shall not engage in any form of forced labour and modern slavery, including involuntary prison labour, bonded labour, trafficking. All employees shall be free of threats of coercion or blackmail; they have the right to terminate their employment after an appropriate period of notice in accordance with local and national regulations.

Raben Group Suppliers shall not require their employees and associates to make financial deposits or deposit documents or other valuable personal possessions, and if such items are withheld, they shall have access to these items on demand.

## **Child labour**

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

Raben Group Suppliers shall avoid 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.

## **Decent pay and working conditions**

Raben Group Suppliers shall ensure that employment conditions, in particular wages, including but not limited to the living wage as defined in applicable laws and regulations, working hours, and additional benefits for a standard working week meet the requirements of local or international law and standards, whichever is applicable.

All employees must be provided with clear and understandable information on the terms and conditions of employment at the outset of their employment. This information must include details of their rights and obligations, as well as details of working hours, remuneration, and payment and settlement modalities. Under no circumstances shall wages be reduced or deducted unlawfully.

## **Drivers working conditions**

As a European transport and logistics services provider, we are firmly committed to ensuring fair working conditions for all truck drivers. In line with this commitment, we fully endorse the Truck Transport Social Guidelines (TTSG) and are committed to promoting their implementation across our supply chains. Therefore, Raben Group Suppliers are encouraged to comply with the TTSG.

## **Freedom of association**

Raben Group Suppliers shall respect the employees' rights to freedom of association, including the right to form or join a trade union or working council under local law and applicable ILO Convention (no. 87 and no. 98). They also shall allow employees to participate in an open dialogue with the Management Board, its proxy, or Management representative. Raben Group Suppliers represent that the dialogue is free of any form of discrimination, retaliation, harassment and the employees' representatives, wherever possible, have been informed about the freedom to perform representative and organizational functions in the workplace.

## **Occupational health and safety**

Raben Group Suppliers shall ensure a safe working environment based on, as minimum, local H&S regulations and the Golden Safety Rules, technical inspections of equipment, regular identification, analysis and reduction of risk factors occurring in their working environment - it also applies to the infrastructure (including machines) made available to employees to perform their daily duties for Raben Group. Raben Group suppliers provide their employees and associates with proper sanitary conditions i.e. 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 suppliers with accommodation: proper living space, safety, cleanliness, heating and ventilation. Suppliers ensure that their employees do not use alcohol, psychoactive substances and narcotics at work or during a period of time that could cause the effects of these substances to persist until they perform their professional activities.

## **Non-discrimination and equal treatment**

Raben Group suppliers shall 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. Raben Group suppliers shall respect the dignity of their employees and shall prevent any form of mobbing, harassment, violation of personal dignity.

## **Land Rights and Forced Evictions**

Raben Group Suppliers shall respect the rights of local communities, including the rights of indigenous people to decent living conditions, education, employment, and social activities, and their 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**

Raben Group Suppliers shall prioritize the protection of property and assets, including those entrusted by customers and business partners. At the same time, they must uphold a firm commitment to respecting human rights. Suppliers shall ensure that any private or public security forces engaged in their operations are adequately trained and properly supervised to prevent actions that could lead to human rights violations.

# BUSINESS CONDUCT

## **Confidentiality**

Raben Group Suppliers are aware that information is of critical value and it constitutes a resource which requires appropriate protection, hence they 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).

Raben Group Suppliers shall use data obtained in their daily business activity only to the extent necessary to perform business processes. Raben Group suppliers protect information, which is the property of Raben Group, including but not limited to intellectual property, as well as that belonging to its employees, customers, partners, suppliers and other cooperating entities.

## **Fair competition**

We expect our Suppliers to recognize that free and fair competition is essential for long-term business success and sustainability. Therefore, Raben Group Suppliers shall comply with all relevant legal frameworks protecting competition, including prohibitions on practices such as price and bid rigging, quota agreements, subdivision agreements, discriminatory agreements, tying agreements, boycotts, and any other actions that could negatively impact fair competition.

## **Counteracting corruption**

Raben Group Suppliers shall comply with the laws, standards, regulations, guidelines on anti-corruption with respect to all activities related to everyday business practice and business ethics. Employees, associates and partners of suppliers shall not, in an unlawful or immoral manner, influence existing or potential counterparties or customers as well as public officials, through preferential treatment, giving presents and other material or personal benefits.

Raben Group Suppliers should comply with the Raben Group Anti-corruption Policy including the Raben Group Gifts and Entertainment Policy that provides that it is allowed in Raben Group to offer and accept gifts and entertainments in the context of business not involving public officials of a gross value not exceeding EUR 50 (gifts) or EUR 100 (entertainment) per person per year. However, more stringent rules can be applied by Raben Group in specific jurisdictions in which Raben Group operates.

## **Export Controls and Economic Sanctions**

Raben Group Suppliers shall comply with all applicable export control, 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 compliance with sanctions legislation Raben Group encourages its Suppliers to establish a management system that supports due diligence related to all relevant trade restriction.

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

Raben Group Suppliers shall comply with the applicable anti-money laundering (AML) and countering the financing of terrorism (CFT) regulations and shall take all appropriate measures to prevent fraud or any unlawful activity, including but not limited to money laundering, terrorist financing or tax evasion. Raben Group Suppliers shall ensure that, through their operations, Raben Group is not directly or indirectly involved in any economic crimes, including violation of anti-money laundering law.

# ENVIRONMENT

## **Environmental protection**

Raben Group Suppliers shall comply with international and national environment protection regulations. They shall also monitor their environmental impact and report, at the request of Raben Group, environmental data, including but not limited to energy, electricity or water consumption.

Raben Group expects its suppliers to implement an environmental management system adequate (e.g. ISO 14001) to the size and impact of their operations.

Raben Group encourages its Suppliers to actively act to take all reasonable steps to reduce their negative environmental impact, including:

- implementing measure to reduce CO2 emission,
- eliminating or significantly reducing emissions of harmful pollutants such as NO<sub>x</sub>, CO, PM10/2.5 SO<sub>2</sub>, CH<sub>4</sub>, NMVOC,
- preventing soil modification, including erosion, nutrient degradation, subsidence and contamination,
- adopting closed-loop systems (circular economy) to reduce waste and enhance resource efficiency,
- protecting ecosystem, especially key biodiversity areas, impacted by operations, and avoiding deforestation.

# WHISTLEBLOWING

Suppliers are encouraged to immediately report any problems and suspicions of legal violations where there is a reasonable circumstance that a serious violation of the rules and regulations contained in this Code may have occurred.

## **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 RG 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.



# Raben

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# 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 – 20km/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, suppliers 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