



# SUPPLIER Code of conduct

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## GIRTEKA GROUP





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# Introduction from the CEO



## Introduction from the CEO

Girteka Group has grown over the last 25 years to become a multinational company, working daily with the world's best-known brands. As Europe's leading asset-based transport company we have an international team of 20,000+ people, made up of many nationalities, cultures, and people who have different experiences in life. The Supplier Code of Conduct sets the standard for our ethical behavior and serves as a guide to help you understand our policies and to support the delivery of our corporate values.

We expect our Suppliers – including sellers, agents, representatives – to uphold Girteka Group's reputation and business through compliance with all applicable laws, rules, regulations, and contractual obligations in all the countries where we operate. Every Girteka Group Supplier company and employee must follow all relevant national and international legislation.

The Supplier Code of Conduct endorses the Fundamental Principles of Rights at Work, the ILO declaration, the Ten Principles of the UN Global Compact, and the International Bill of Human Rights. We, as a company and you, as a Supplier, have a duty to comply with these.

Our Supplier Code of Conduct sets out what behavior is expected of the Suppliers. However, the Code cannot cover every issue that may arise in our cooperation and therefore you.



Edvardas  
Liachovičius





## Introduction from the CEO

should always use common sense when conducting business with the Girteka Group. If you are uncertain about any public laws, policies, or contractual obligations, contact Girteka Group for further guidance and advice.

As a company, we hope going forward to celebrate not just our longevity but also sustainable growth, employee satisfaction, enhanced road safety, a reduction in our environmental impact and the continued support of the community at large in sustainable development.

The need for sustainable growth and development is ever – increasing, and together, as individuals and as a company we need to focus on our costs and the efficiency of our assets, whilst embracing the productivity benefits of digitalisation to improve processes and make better decisions.

Our Girteka Group Supplier Code of Conduct is based on our company values and and people we conduct business with.. I encourage you strongly to act if you are faced with or suspect non-compliance with the Code of Conduct.

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**Edvardas Liachovičius**  
CEO Girteka Holding

# Working Conditions



# 1. Working conditions

We expect our Suppliers to show a strong support for human rights provided in the Charter of the United Nations Universal Declaration of Human Rights. These are fundamental and should always be protected. It is our policy that all Suppliers who directly or indirectly participate in the delivery of products, components, materials and services to Girteka Group, must be treated with dignity and shown the highest respect for their fundamental rights.

## 1.1 COMPLIANCE WITH THE UN HUMAN RIGHTS

As a Supplier you must support and always work to comply with conventional human rights and labour laws and recognise and support equal human rights.

You must not tolerate:

- differential treatment;
- discrimination;
- harassment;
- inappropriate or unreasonable interference with work performance.

The above applies irrespective of age, nationality, race, disability, or gender, including gender identity or gender expression, sexual, religious, or political orientation, and ethnic or social background. Physical, sexual, mental, or verbal abuse is prohibited, as are threats of abuse and any form of intimidation.

## 1.2 FIGHTING MODERN SLAVERY

As a Supplier you must not tolerate any practices of human trafficking, forced labour, and debt servitude across our supply chains and in any other part of our business.

Forced employment and working conditions resembling servitude are prohibited.

## 1.3 CHILD LABOUR

The minimum age for workers is not less than 18 and complies with:

- the national minimum age for employment, or;
- the age of completion of compulsory education, whichever of these is higher.







There shall not be a recruitment of child labour, this is defined as any work performed by a child younger than the ages specified above.

No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety, or morals, including night work.

If local minimum is set at no lower than 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply. As a Supplier, you are expected to commit to reacting instantaneously to all instances where child labour is identified, acting in the best interest of the child, by ensuring that the child is removed from their job position and is provided with sustainable alternatives for further development. You are expected to inform Girteka Logistics if you become aware of Child Labour across in your supply chain.

#### 1.4 REGULAR EMPLOYMENT

You must comply with current national legislation and agreed standards for employee working hours, wages, and work environments.

Obligations to your employees under international conventions, national law, and regulations concerning regular employment are not avoided through the use of short-term contracting (such as contract labour, casual

labour, or day labour), sub-contractors, or other labour relationships.

The following rules always apply:

- employees have the right to join a union and to collective bargaining;
- constructive dialogue between employer and employee is fully supported;
- all workers are entitled to a contract of employment in a language they understand;
- employees must receive a letter of confirmation of their employment conditions if required by national legislation;
- employees have the right to leave Girteka Group, a right that is stated in the employment contract and is an integral part of the local labour code;
- the duration and content of apprenticeship programmes are clearly defined;
- a record of every employee's working hours and wages is kept, ensuring compliance and transparency.

#### 1.5 WAGES

The remuneration of employees, including the benefits provided, as a minimum must meet national legal standards and -/- or industry benchmark standards, whichever is higher.

A deduction from wages as a disciplinary measure shall not be permitted.



All workers are provided with a written and understandable contract outlining their wage conditions and method of payments before entering employment.

## 1.6 DRIVING TIME AND REST PERIODS FOR OUR DRIVERS

Suppliers providing haulier services must ensure that maximum daily and fortnightly driving times, as well as daily and weekly minimum rest periods for all drivers are regulated in accordance with the EU rules or local laws in countries where EU regulations do not apply.

You should have established guidelines for following these regulation rules.

## 1.7 CABOTAGE AND INTERNATIONAL DRIVING

We expect our Suppliers providing haulier services to take a stance against traffic offences and constantly work on developing monitoring systems and on improving driver education to prevent traffic offences.

All applicable international and national traffic rules must be respected.

You must follow the EU and non-EU countries rules for cabotage to prevent cabotage infringements and adjust our processes and operations respectively.

## 1.8 SUPPLY CHAIN SECURITY

We expect our Suppliers to ensure security throughout their entire supply chains, including the traditional practices of supply chain management with the security requirements, for combatting threats such as terrorism, piracy and theft.

You should cooperate with the border control and other official institutions to prevent illicit trafficking and brokering of material.

Suppliers providing haulier services are required to have policies in place ensuring the security of cargo transported on the behalf of Girteka Group.





# Occupational Health and safety





## 2. OCCUPATIONAL HEALTH AND SAFETY

The occupational health, safety and well-being of employees should be a core value of your company. It is critical that you ensure a healthy physical and psychological working environment for your employees in each of their workplaces, whether on the road, own sites committed to not only monitoring and improvement but proactive approach to safety. Each employee should contribute to upkeeping their safety at work and the creation of a safe environment for their colleagues, through compliance with all safety regulations and exercising care to prevent accidents.



## 2.1 Health and safety at work

### As a Supplier, you are expected to be committed to:

- treating health and safety as a core value of company. All attitudes, choices, and actions in all respects take consider safety. What is leading to proactive approach to safety to eliminate all
- possible hazards in occupational environment; creating an accessible occupational health and safety management system that minimises or eliminates risk of injury or illness;
- engaging with all staff, visitors and partner organisations in creating a safe working environment and safe systems of work;
- developing and maintaining a behaviour based safety policy that encourages all personnel to actively manage occupational health and safety risks;
- Providing a continuously improving occupational health and safety management system by foreseeing approach by taking initiative to
- eliminate all hazards; operating a no blame safety culture where employees are encouraged to speak openly about problems and the obstacles to progress;

Aiming to meet the highest possible standard of health and safety management system.

- Girteka Group leaders are empower employees to put safety before results and to create Health and safety environment.
- To ensure the most safe and hygienic working conditions with use of the newest scientific and technical achievements.

### You should take the following actions to safeguard health and safety procedures at work:

- compliance with all relevant occupational health and safety legislation and requirements;
- occupational health and safety training for all staff; occupational health and safety information and instruction to all personnel;
- engagement with and inclusion of staff in consultation processes for decision making where there is an impact on workplace health and safety as well as improve safe environment and safety culture awareness;
- documentation and communication of occupational health and safety responsibilities, authority to act, and reporting requirements for personnel at all levels in the workplace;
- learning from incidents, is just one of many activities in managing safety that are registered internally and investigated along with Incident sharing and Near miss reporting;

- active identification and management of occupational health and safety risks, through the systematic identification and hazards, risks and implementation of effective risk controls; prompt reporting of hazards, incidents and injuries, investigation where appropriate, and implementation of control measures to eliminate or minimize the risk of reoccurrence;
- You as Supplier should have procedures in place to ensure on time reporting, investigation, communication, and preventive actions of further occurrences of work related health, safety and wellbeing incidents and Near miss events within your company.
- A zero tolerance to alcohol and substance abuse at the workplace.



## 2.2 Behaviour Based Safety Policy

Safety is one of the main goals in terms of people and the cargo that we are delivering. To secure people and maintain ongoing operations Suppliers should have a Behaviour Based Safety (BBS) policy in place, that covers all the activities and areas needed to reduce the number of accidents.

Suppliers should be involved at every stage of the BBS policy to ensure alignment across the whole Suppliers' company and its operations. Leaders are inspiring and empowering employees to implement safety behavior in their day-to-day life. To secure continuous improvement you should cooperate with your colleagues to identify and resolve hazards that occurs in their work environment. Suppliers should also have specified and provided appropriate Personal Protective Equipment for each place of work, with clear instructions on how to use them, with a maintenance and servicing process in place.

The BBS system should be evaluated internally on a regular basis. The goal is to learn from observations and to positively influence the future behaviour of workers to gradually improve the safety culture across the organisation.

Unsafe actions, poor decision making, at risk behaviour, etc. are signs that the company has a poor safety culture. You as a Supplier must show commitment which involves the management and employees attending regular safety meetings, trainings according to risk assessment on each work place.

Additionally, Suppliers should have implemented a Near Miss Reporting System when an unsafe condition, near miss etc. is reported and communicate back what actions have been taken to avoid future incidents and reduce the number of accidents. All written procedures and instructions are communicated internally on a regular basis, establishing a sufficient level of information to secure the safety of our employees and the community.

Your management leads by example in following procedures and using PPE, and are open to any suggestions or concerns from employees on improving safety systems and procedures. As we know that safety issues are crucial, senior management along with employees do take immediate actions whenever there is an unsafe situation or near miss reported and

communicate widely and openly the action plans for future improvements.

You should encourage a team spirit and trust between employees and management, and show commitment to safety within all activities, through regular controls, discussions and improvement programmes.



# Competition



## 3. Competition

Competition laws, like all other legislation, are vital to us and must always be strictly adhered to. To ensure compliance we must be aware of situations that could have an impact on competition.

Agreements, regardless of contract form, must always be negotiated in compliance with fair competition principles.

### 3.1 LIMITATION OF COMPETITION

You must not conclude any formal or informal contracts or agreements with the intention or probable effect of illegally restricting, eliminating, preventing, or distorting competition.

Suppliers must not take part in any anti-competitive activities. These consist of, but are not limited to:

- limitation or controlling of production or capacity;
- price-fixing;
- market sharing or market division;
- limitation and control of capacity; meetings, conferences, forums, committees, and similar which are

organized by trade or industrial organisations and may have an anti-competitive effect;

- exchange of information concerning prices or other terms and conditions regarding Girteka Group companies, Suppliers or other related third parties;
- exchange of other illegal or confidential information.

### 3.2 MEETINGS, CONFERENCES AND VENDOR EVENTS

Never discuss business-related, potentially competition restricting topics with competitors. If competition restricting topics are discussed at a meeting or industry forum, in disagreement with competition law, you must leave the room immediately and request that your departure and refusal to participate be entered into the minutes of the meeting. If minutes are not usually prepared at such meetings, employees must request the preparation of such minutes. If the request is not accommodated, employees must write their own minutes and inform senior management accordingly.

You are advised to proceed with caution not only in physical meetings but also when participating in virtual forums (telephone meetings, social media forums, video calls, webcasts, etc.) where information may be published or shared.

If participation in such events takes place, be aware that any agreements made in such events, regardless of contract form, must always be negotiated in compliance with fair competition principles.

You should consult your immediate manager or the relevant senior management before participating in events where competitors may be present and business-related topics might be discussed formally or informally, this also applies to vendor events.





# Anti-corruption



## 4. Anti-corruption

As a Supplier, you must respect the following specific rules to address anti-corruption. The principles do not prohibit normal and appropriate hospitality given or received.



### 4.1 BRIBERY

Bribery refers to any offer, kickback or acceptance of a gift, loan, fee, remuneration or anything of value to or from another person or entity as an incentive to influence or promote a certain act or omission which would not have been appropriate in the absence of the bribery. The prohibition of bribery extends beyond monetary transfers and includes the transfer of any kind of assets.

Consequently, the prohibition covers bribery in the form of payment of travel expenses; disproportionate entertainment expenses; charitable donations; delivery of products or services; transfer of financial or other personal benefits.

Girteka Group does not tolerate any form of bribery, without exception, including in countries where bribery is legal or where it is accepted as normal business practice.

You as a Supplier must not accept or offer a bribe of any kind and support anti-corruption policies across your entire supply chain, even if they are a part of local law or local custom.

### 4.2 MONEY LAUNDERING OR FINANCING OF TERRORISM OR OTHER CRIMINAL ACTIVITIES

Money laundering is the act of concealing or disguising money obtained from criminal activities and making them appear to have originated from legitimate sources or constitute legitimate assets. Concealment of the fund source or the intended use of funds may be involved in funding terrorism operations.

You must not engage in money laundering, funding of terrorism, funding of other criminal activities or be involved in any other activities that facilitate money laundering.



# Gifts and donations



## 5. Gifts and donations

While entertainment, hospitality and the exchange of business gifts are considered common practice and part of building and maintaining business relationships throughout the world, we should limit this to the absolute minimum.



### 5.1 NO GIFT POLICY

Girteka Group operates with a No Gift Policy, fully committing to conducting business with integrity and avoiding miscommunications where a gift could be perceived as a reward or inducement for business. We expect our Suppliers to adhere to our No Gift Policy when conducting business with or on behalf of Girteka Group.

When working directly with Girteka Group, you must not offer gifts to employees. This includes any form of gift, including food, beverages (alcoholic/non-alcoholic), hospitality and entertainment.

An exemption to the policy is token gifts that are of nominal value, for example gifts with a company logo (such as pens, notepads, planners, calendars and other small promotional items) that are given out to employees, customers, delegates, students and members of the public, attending events such as conferences, exhibitions, trainings, career fairs, etc, and deemed as part of a company's brand building or promotional activities.

### 5.2 DONATIONS TO CHARITY

Girteka Group recognises the importance of companies in supporting charities and local communities.

Reasonable support and donations may be in the form of payment, services or materials.

It must be ensured that any payments to community organisations are not a form of bribery and are not used as a cover for fraud. Contributions or sponsorships must be disclosed, transparent and in accordance with national legislation.



# Conflicts of interest

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## 6. Conflicts of interest

A conflict of interest is when an employee's obligations and interests when acting on behalf of Girteka Group conflict with his or her personal interests. It is important that Suppliers conduct business activities in the best interest of Girteka Group. It is the responsibility of every Supplier to exercise personal judgement regarding conflicts of interest in compliance with internal rules of prevention of conflict of interest.

### 6.1 SUPPLIERS AND CUSTOMERS

You, as a Supplier, must not participate in any commercial transactions with a Girteka Group company in which you have direct or indirect personal interests, financial or otherwise.

Appointments and all other aspects of the employment must always be based on qualifications, performance, skills and experience.

You are expected to have measures in place to avoid reporting relationships, direct or indirect between related parties in your company. We encourage our Suppliers to prohibit giving loans to their employees and to parties related to employees.

Other grounds when employees could be found in the conflict of interest shall be provided in internal rules which has to be strictly followed.



# Processing of Information



## 7. Processing of information

You must respect and protect the confidentiality of information belonging to Girteka Group, our customers, other Suppliers and other business partners and we expect you to be loyal to our business strategy and corporate values.

### 7.1 CONFIDENTIAL MATERIAL AND INFORMATION

You are not allowed to disclose any confidential or proprietary information received from Girteka Group to anyone not employed by Girteka Group, when working together and for the period defined by the local law after the contract is terminated with the Supplier or you are no longer an employee of the Supplier.

All non-public information that could be of use to competitors or harmful to Girteka Group, including our customers, Suppliers and other business partners if disclosed, is confidential and proprietary information.

Confidential or proprietary information may only be disclosed to a third party strictly on a need-to-know basis unless the disclosure is required by law.

### 7.2 DATA PRIVACY

To comply with data privacy legislation, you should have issued binding corporate rules which protect collected personal data from being copied, corrupted, misused, stolen, disclosed or accessible to persons without adequate authorisation and approval.

We expect our Suppliers to have internal policies for ensuring the security and correct processing (storing, deleting or sharing) of personal and sensitive data.







### 7.3 LOYAL CONDUCT

Our Suppliers are expected to loyally support our business strategy and corporate values and to consider the impact your actions have on our brand and avoid any damaging or derogatory communications, whether online or elsewhere.

When communicating in the public domain, in any way related to Girteka Group, directly or indirectly, it is prohibited to communicate the following:

- Messages or postings, including comments or content about race, gender, disabilities, age, sexual orientation, pornography, religious beliefs and practices, political beliefs, or national origin, irrespective of whether such message or posting is disclosed on an identified or anonymous user basis
- Messages or postings containing statements on any subject that could be mistakenly interpreted as the standpoint of Girteka Group
- Publication of defamatory and/or knowingly false material about Girteka Group, its employees and/or customers or Suppliers on social networking sites or in any other online publishing format.

This applies regardless of the platform used, irrespective of whether such activities occur online or offline, the device is private or company-owned, during or outside the office hours.



# Environmental management system policy



## 8. Environmental management system policy

Girteka Group is committed to minimising pollution, promoting efficiency and the use of sustainable resources, including energy, fuel, and water, and reducing CO2 emissions.

We expect our Suppliers to collaborate in achieving the main goals of our Environmental Strategy, which are:

- to reduce pollution, CO2 emissions, and waste;
- to increase the sorting and recycling of waste;
- to build awareness by involving employees and partners in efforts to protect the environment;
- to apply green criteria for purchasing;
- to comply with environmental legislation;
- to prevent potential environmental incidents and be ready to address any that might occur.

As a Supplier, you should take action to minimize adverse impacts on human health and the environment throughout the value chain. To the extent possible and when available, you must look for and offer sustainable and innovative services, corresponding to our environmental considerations and supporting our business model development and improvement.



# Complying with the code of conduct



## 9. Complying with the code of conduct

We, as a company, strive to uphold these standards throughout our entire supply chain, therefore our Suppliers are expected to respect the Supplier Code of Conduct across their business activities, when conducting business on behalf of Girteka Group and when choosing business partners. We expect you to promote the values and policies outlined in Girteka Group Supplier Code of Conduct across your supply chain.

If you need assistance or have questions or concerns about the Supplier Code of Conduct, you should first seek advice from Girteka Group. You can do this by consulting your contact at Girteka Group or through the Whistleblower Program (by emailing [prevention@girteka.eu](mailto:prevention@girteka.eu) or anonymously calling +370 5 2177396).

Girteka Group reserves the right to check how Suppliers comply with the Code of Conduct.

Any breaches may lead to measures up to and including immediate termination of the business relationship.

At Girteka Group, we encourage and seek out collaboration to promote these standards, and continuously review them. We strongly encourage such practice to be extended into our Suppliers' operations, upholding the Supplier Code of Conduct.







**Girteka**