



EUROTERMINAL

**Code of conduct for SUPPLIERS
of
goods and services**

Approved date: 17. October 2022

Approved by: The board

This Code of Conduct/Ethical guidelines for suppliers of goods and services (hereafter referred to as the «ethical guidelines») is applicable not only for suppliers to EURO TERMINAL REAL ESTATE (ETRE), but also for suppliers of any fully owned subsidiary of EURO TERMINAL REAL ESTATE with address Jana Soltana 1, 72-602 Swinoujscie, Poland.

1. What is the purpose of the ethical guidelines?

- These ethical guidelines shall promote and contribute to ensuring respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services to ETRE.

2. Principles

- Ethical guidelines for suppliers of goods and services set the minimum standard and must be complied with by all suppliers ETRE uses. Suppliers must comply with applicable national and international laws and internationally recognized standards like UN and ILO conventions regarding human rights.
- In the event of deviations or conflicts between the national legislation and these guidelines, the supplier must follow the strictest of the standards that are in accordance with applicable law.
- The company's suppliers must use reasonable efforts to ensure that their own subcontractors also follow these standards, including subcontractors backwards in the value chain.

3. Business practices

- ETRE has zero tolerance for corruption. Transactions with ETRE should preferably be contractual and of a normal business nature. All transactions with ETRE must be legal. Background checks can be done for suppliers and partners.
- The supplier shall abstain from, and reject, any form of bribery, corruption or money laundering. This provision shall not be circumvented by intermediaries. Courtesy gifts of modest value may exceptionally be accepted. Catering in the forms of meals, social events and entertainment should only be offered in connection with legitimate business activities and should be kept within reasonable limits.

4. Working conditions

- The supplier is to respect and abide by obligations to its employees under national law and social security systems
- Working hours, salary and other remuneration must comply with applicable laws and agreements.

5. Health and safety of employees

- Supplier must act in accordance with the applicable laws and regulations regarding occupational health and safety and provide safe working conditions.
- Necessary measures must be implemented to prevent accidents and damage to health.
- Employees must be regularly trained in health and safety and have access to clean sanitary facilities and clean drinking water.
- If the employer offers accommodation, this must be clean, safe and adequately ventilated and with access to clean sanitary facilities and clean drinking water.

6. Discrimination and harassment

- There shall be no discrimination in working life based on ethnicity, caste, nationality, religion, age, disability, sex, marital status, sexual orientation, trade union membership or political affiliation.
- Any form of harassment or actions that can reasonably be viewed as offensive or intimidating, including any form of unwanted sexual attention is unacceptable. Physical abuse or punishment, or the threat of physical abuse, shall be prohibited. The same applies to sexual or other abuse, and other forms of humiliation.

7. Child labor and forced labour

- The supplier must not engage in, or support, the use of child labour in accordance with international and national laws and regulations. Children under the age of 18 must not perform work that is detrimental to their health or safety, including night work. Children under the age of 15 (in some countries 14 or 16) must not perform work that could be detrimental to their health and/or education.
- There shall be no form of forced labor, slave labor or involuntary labor. Employees shall not have to deliver a deposit or identity documents to the employer and shall be free to terminate the employment with a reasonable period of notice. All employees must receive a written agreement in an understandable language that contains current wage terms and method of payment before the work is started.

8. Freedom of association

- The right of workers to form or join trade unions and bargain collectively must be respected by suppliers. Trade union representatives must be able to carry out their functions, and discrimination against elected representatives or unionised employees is unacceptable. If trade unions are not permitted in the region in which the supplier operates, then supplier is not to prevent workers from gathering independently in other forms to discuss work-related issues and offer them forum for raising work-related concerns with the management.

9. Privacy and data protection

- Privacy and data protection laws (GDPR) protects the integrity and confidentiality of a person's private information.
- Privacy is a human right and it is important to protect this value.
- Respect everyone's privacy and supplier to ensure that personal data is effectively protected and that processing of personal data is performed in accordance with applicable laws.

9. Compliance and monitoring

- The supplier shall continuously work to improve its standards and shall comply with the minimum standards as described in this document.
- ETRE reserves the right to (a) demand that the supplier take corrective action or (b) terminate the business relationship/agreement if the supplier is unable to meet the applicable minimum requirements or improve its standards.
- In the event of significant deviations or violations of the ethical guidelines described in this document, ETRE shall be notified without undue delay.
- If ETRE so requires, the supplier agrees that ETRE has the verify and evaluate compliance with the requirements in this ethical guideline. The Supplier is to cooperate with ETRE in such evaluation of its compliance with this ethical guideline.