



MEXEM CODE OF CONDUCT

Our commitment

The MEXEM Sp. z o.o. Code of Conduct sets out the fundamental principles that guide us in the conduct of our business and in our dealings with our employees, customers, suppliers, carriers, subcontractors and other business partners.

At MEXEM, we believe that lasting business relationships should be based on trust, integrity, mutual respect, responsibility and compliance with applicable laws.

We expect our business partners to respect the principles set out in this Code and to take appropriate action with regard to their own employees, subcontractors and suppliers.

This Code supplements the policies, procedures and principles of MEXEM's management system. Specific operational requirements are set out in the relevant internal procedures and applicable legislation.

I. HUMAN RIGHTS AND LABOUR RIGHTS

We respect human rights and conduct our business with respect for the fundamental rights and freedoms set out in universally recognised international standards and applicable legislation.

Respect and dignity

We foster a working environment based on mutual respect, dignity and professionalism. We do not tolerate discrimination, harassment, sexual harassment, bullying or any other behaviour that violates human dignity.

Decisions regarding employment, remuneration, career development and other terms and conditions of employment are made on the basis of objective, justified and lawful criteria.

Prohibition of forced labour

We do not tolerate forced labour, slavery, human trafficking or other forms of human exploitation. Employment relationships must be established and maintained on a voluntary basis and in accordance with applicable laws.

Prohibition of child labour

We do not employ children or use child labour. The minimum age for employment and the rules governing the employment of young people are set out in the legislation applicable to the place of work.

Freedom of association

We respect our employees' right to organise and to engage in dialogue in accordance with applicable legislation.

Remuneration and terms of employment

We ensure that terms of employment and remuneration comply with applicable legislation and the contracts entered into. We ensure equal pay for equal work or work of equal value, in accordance with applicable legislation.



II. HEALTH AND SAFETY AT WORK

The safety of our employees, drivers, business partners and other individuals who may be affected by our operations is a key element of our responsible business practices.

We identify hazards and assess the risks associated with the work carried out, and we take measures to prevent accidents and minimise risks. Employees are provided with the information, training and resources necessary to carry out their duties safely.

We ensure that we are properly prepared to respond to emergencies and that incidents which may affect safety are reported and analysed. Detailed rules on health and safety, risk management and emergency response are set out in MEXEM's procedures and management system policies.

Every employee and contractor is obliged to respond to any hazards they observe and to report incidents and situations that may affect the safety of people, property or ongoing operations.

III. ENVIRONMENTAL RESPONSIBILITY

MEXEM is aware of the impact of its transport, freight forwarding, warehousing and administrative activities on the environment. We identify and monitor the significant environmental aspects associated with our operations and take measures to minimise their negative impact on the environment.

We pay particular attention to:

- fuel and energy consumption,
- greenhouse gas emissions,
- transport efficiency and fleet utilisation,
- reducing empty runs,
- the rational use of resources,
- waste management,
- reducing energy and resource consumption at our facilities.

We utilise organisational, technological and operational solutions that can contribute to improving the environmental performance of our operations. We strive for continuous improvement in our environmental impact, to an extent commensurate with the nature and scale of our operations, taking into account technological and economic feasibility as well as applicable legal requirements.

IV. INTEGRITY AND BUSINESS ETHICS

Compliance with the law

We conduct our business in accordance with applicable laws and the requirements relevant to our operations. We expect our employees and business partners to be familiar with and comply with the laws and regulations applicable to their duties.

**Anti-corruption**

We do not tolerate corruption, bribery, kickbacks, facilitation payments, embezzlement, extortion or any other forms of obtaining benefits dishonestly. We do not offer, promise, demand or accept financial or personal benefits if they could influence, or appear to influence, the independence of business decisions.

Conflict of interest

We make business decisions with MEXEM's interests and the applicable rules in mind. We avoid situations in which our personal or financial interests, or those of our close associates, could conflict with MEXEM's interests. This applies in particular to relationships with clients, carriers, suppliers and other business partners. Potential conflicts of interest must be reported to a line manager or the person responsible for the relevant area.

Gifts and benefits

Gifts, invitations and other benefits arising from business relationships must not be used to exert undue influence on decisions, nor must they create the impression of doing so. We neither accept nor offer benefits whose nature, value or circumstances could compromise the independence of a business decision.

Fair competition

We conduct our business in accordance with the principles of fair competition and applicable competition law. We do not participate in agreements with competitors concerning, in particular, prices, rates, customers, market sharing, commercial terms, tender bids or other information the exchange of which could restrict competition.

We use information obtained from customers, competitors, carriers and other business partners solely in a manner consistent with the law and the principles of fair dealing.

Sanctions and trade restrictions

We comply with applicable trade restrictions, economic sanctions and other requirements concerning the legality of the transactions and services we carry out.

Accuracy of accounts and records

We maintain our accounts, records and reports in a reliable, accurate and transparent manner. We do not tolerate the falsification, concealment or deliberate misrepresentation of information relating to MEXEM's operations.

V. INFORMATION AND DATA PROTECTION

We protect confidential information relating to MEXEM, our employees, customers, carriers, suppliers and other business partners. Access to information should be granted in accordance with the scope of duties and in line with the principle of limited access.

We do not disclose confidential information to unauthorised persons, nor do we use it for purposes other than those related to the performance of our duties or the pursuit of legitimate business objectives.



We process personal data in accordance with applicable data protection legislation, in particular the GDPR. Detailed rules on the protection of information, personal data and the security of IT systems are set out in the relevant MEXEM policies and procedures.

VI. RESPONSIBILITIES OF BUSINESS PARTNERS

We select business partners taking into account their reliability, compliance with the law and the risks associated with the nature of the cooperation. We expect our business partners to comply with the principles set out in this Code or to apply their own standards ensuring at least a comparable level of responsibility.

In particular, we expect compliance with the principles relating to:

- human rights and labour rights,
- health and safety at work,
- environmental protection,
- anti-corruption,
- fair competition,
- information and data protection,
- compliance with applicable laws.

Business partners should also take appropriate measures with regard to their subcontractors and suppliers.

MEXEM may, to a reasonable extent and in accordance with the terms of the cooperation, assess business partners' compliance with the requirements of this Code.

The assessment may include an analysis of documents, information regarding business practices, interviews with the partner's representatives and – if agreed as part of the cooperation – an audit.

Should any significant non-compliance be identified, we expect appropriate corrective action to be taken within the agreed timeframe. Audits and assessments of business partners are conducted in compliance with applicable laws, confidentiality principles and data protection regulations.

VII. REPORTING IRREGULARITIES

At MEXEM, we encourage the reporting of actual or potential breaches of the law, the principles of this Code, applicable procedures and other irregularities relating to MEXEM's operations.

We ensure that reports can be made confidentially and in accordance with applicable regulations. We do not tolerate retaliatory action against individuals who make reports or participate in investigative proceedings, in accordance with applicable law. We also ensure the protection of the rights of those concerned by the report, and that follow-up actions are conducted fairly and impartially.

Reports may be made via the channels specified in MEXEM's Internal Reporting Procedure.

Contact regarding reports: etyka@mexem.com.pl



Detailed rules governing the submission of reports, the conduct of follow-up actions, the protection of whistleblowers and record-keeping are set out in MEXEM's separate Internal Reporting Procedure.

VIII. RESPONSIBILITY AND CONTINUOUS IMPROVEMENT

Each of us is responsible for complying with the principles set out in this Code insofar as they relate to our duties. MEXEM's management is responsible for creating conditions that foster lawful, ethical and responsible business conduct.

The Code forms part of our management system and is applied in conjunction with applicable policies, procedures and instructions.

We regularly review the effectiveness of the adopted principles and take steps to improve them, in line with changes in our business, the legal environment and the requirements of our clients and business partners.

FINAL PROVISIONS

This Code applies to MEXEM and forms the basis of our expectations of our business partners.

In the event of any conflict between the provisions of this Code and mandatory legal provisions, the relevant legal provisions shall apply. This Code is subject to periodic review and update in line with legal, organisational and business changes.

MEXEM Sp. z o.o.