

## Code of Conduct

### Preamble

As a provider of services without geographic limitations, we are fully aware that we do not operate in a segregated socio-economic space. In order to recognize ourselves as a professional service provider in the international arena, we conduct our strategy based on Corporate Social Responsibility. This practice impacts the standards of our Organization and brings additional positive value to the environment. Our activities are inspired by international standards: Sustainable Development Goals adopted by the United Nations. We realize that a responsible and ethical approach to running business activity plays a key role in the successful policy of our company and the implementation of our established goals.

Competence and responsibility are the overriding qualities nurtured at JIT Logistik. We are against compromise in ethically ambiguous situations, consistent and determined to respect our assumptions. Open, frank and uninterrupted communication in our Organization is the rule, not the exception. We have been creating our organizational culture continuously for 10 years. We conclude that responsible social policies created at the local level contribute to increased competitiveness at the global level. Cosmopolitanization, globalization, increased migration of people, as well as technological advances, ever higher demands for operational efficiency are forcing a greater focus than ever before on the ethics and values we nurture in our business environment. We follow the recommendations, practices of associations, international organizations, associations like the aforementioned 2030 Agenda for Sustainable Development, as well as the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights. On the basis of the knowledge gathered and further permanent development of our competence, we believe in the only right line of our decisions in the area of ethics and values.

This document is a set of practices applied by us, which, in our opinion, allows us to be a conscious organization that cares about human rights, upholds safety, environmental protection and prevention of irregularities. The code of conduct is a commitment to every employee, driver, customer, business partner, transportation partner. The essence of the matter makes you familiarize yourself with its content, and I believe it will be a valuable guide for taking daily decisions.

As the CEO and Founder of JIT Logistik, I undertake to make every effort to ensure that the provisions of this Code are always respected.

Ostrów Wielkopolski, 05.09.2022

**Krzysztof Babral**  
The President of the  
Management Board

## 1. Organizational governance

- a) JIT Logistik is engaged in the service business of transporting and forwarding goods internationally while respecting economic sanctions and the ban on exporting or importing goods to embargoed countries.
- b) At JIT Logistik, we create task and responsibility areas that allow us to provide professional services with the utmost care in implementing and applying sustainability guidelines that are part of corporate social responsibility.
- c) At JIT Logistik, all development plans are created and implemented in conjunction with the principles of corporate social responsibility. Cyclically, with the adopted frequency, the implemented solutions are subjected to performance measurement and reporting.
- d) At JIT Logistik, all activities undertaken are transparent, properly controlled with respect for the basic principles of socio-economic ethics and the expectations of all stakeholders: employees, drivers, customers, business partners, transport partners.
- e) At JIT Logistik, we strive to involve all employees in the development of the Organization in every aspect. The division of tasks among employees is created based on the employee development plan.
- f) At JIT Logistik, we recognize the need for continuous improvement on both a team and an individual level. Improving the implemented processes, creating ergonomic solutions successfully allows us to provide high quality services to our customers, as well as to generate added value for our partners. Individual approach to an employee, leadership nature of the management staff, substantive trainings tailored to the needs of a job, organizing internal and external training allow our employees to continuously increase their knowledge and skills.
- g) At JIT Logistik, we place great importance on building an organizational identity. We appreciate and notice individuality, while creating the need for competition, team spirit, necessary to strengthen organizational order.
- h) At JIT Logistik, for the purpose of building organizational culture and positive internal and external image, we introduce Employer branding solutions so that the JIT Logistik workplace is as friendly as possible and meets the needs of all employees.

## 2. Human and worker's rights

- a) At JIT Logistik, we operate according to the highest human rights standards. We respect and adhere to the UN Guiding Principles on Business and Human Rights and International Declarations on Human Rights such as the OECD Guidelines for Multinational Enterprises. Respect for human rights is embedded in every aspect of business. We oppose all acts and manifestations of human rights violations in our organization. We are committed to respecting

the human rights guaranteed to our employees regardless of the location of JIT Logistik's business operations.

- b) Due to JIT Logistik's field of activity, we are committed to the international regulations regarding the non-employment of children, who are persons under the age of 16 according to the European Union regulations. Employment of juvenile workers is carried out in accordance with the law.
- c) At JIT Logistik, we do not allow any form of forced labour. We do not practice slave labour, forced labour, forced labour of prisoners. Employment of workers does not have forms of threats, blackmail, coercion in particular taking away personal documents or work permits. We do not require employees to commit beyond the practices typical of the TSL industry, make deposits or deposit documents. Employees have the right to terminate their employment relationship at the end of the notice period regulated by the labour laws.
- d) At JIT Logistik, working conditions, in particular wages, working hours, entitlement to breaks and social benefits, fringe benefits for a standard working week are based on national legal standards and international laws and regulations, whichever is applicable. These regulations are presented to an employee in an understandable written form before the commencement of the employment relationship or changes in job position obligatorily in accordance with local legal requirements. We do not allow the use of wages deductions as a disciplinary factor.
- e) At JIT Logistik, dialogue underlies our cooperation. We allow our employees freedom of association, the right to collectively bargain on terms and conditions of employment, and the opportunity to participate in dialogue with the Management Board, its proxy or management representative. The dialogue is devoid of any form of discrimination.
- f) As part of our management philosophy, we promote the values of development readiness, outcome orientation and respect. We support the personal development of our employees. To this end, we implement appropriate staff development and training programmes, provide our employees with opportunities for challenging work.
- g) We enable them to identify with our company. At the same time, we expect our employees to be open-minded and ready to take responsibility for their own training and development.

### **3. Occupational health and safety**

- a) At JIT Logistik, the safety of employees and all participants to transportation and shipping and logistics processes is of paramount importance. An indispensable part of people's safety is not only compliance with laws and rules, but also the permanent creation of awareness of risks in the workplace. Our goal is to build the perception of employees so that safety is an asset to be taken care of in a personal context, as well as with respect to their colleagues and others involved in JIT Logistik processes. Activities that can result in danger to health and life are strictly prohibited.
- b) At JIT Logistik, adherence to safety is embedded in management's actions. At each location of the Organization, we have appointed a management representative responsible for building a safety culture in accordance with local laws.
- c) In line with JIT Logistik's notion of safety, we care about the health and safety of employees and partners. Our policy is to achieve zero accidents. Such a clear statement enforces the provision of a safe work environment through cyclical identification, analysis and minimization of risks at workplaces.

- d) JIT Logistik is moving towards taking preventive measures in the area of risk of occupational accidents and diseases considered occupational ones. We regularly build awareness among employees and our partners about existing risks and teach how to counteract them.
- e) At JIT Logistik, we make sure that employees and partners carry out tasks and duties in compliance with safety guidelines. Regularity, consistency of rules, involvement of all participants and common sense are key. We do not allow anyone to consume alcohol, use psychoactive drugs and intoxicants both at work and at a time that would result in the action of said substances at the time of professional activities.
- f) At JIT Logistik, we have implemented behavioural management through safety conversations because we realize that uncorrected behaviour and inadequate technical conditions are the most common causes of accidents.
- g) At JIT Logistik, we provide the necessary and appropriate infrastructure to perform work safely. Vehicles, machinery, equipment used by JIT Logistik employees are subjected to periodic maintenance and repair. We influence the enforcement of the same standards among our partners.
- h) At JIT Logistik, we care about cleanliness and hygiene in the workplace. In our organization's facilities we provide potable water, basic foodstuffs, a place to prepare and eat meals, clean sanitary facilities in an amount appropriate to the number of employees.

#### **4. Equal treatment and prohibition of discrimination**

- a) At JIT Logistik, the principle of equal treatment applies in every aspect of activity and at every level of the organizational structure. At JIT Logistik, we respect diversity and give every employee the opportunity to develop in all areas of the organization.
- b) JIT Logistik ensures equal treatment of women in every area of the company's activity. Women have unlimited access to promotion, professional development and remuneration.
- c) At JIT Logistik, we are committed to respecting the established universal principles of equal treatment and preventing any form of discrimination. We do not tolerate even the slightest manifestation of discrimination and unequal treatment especially on the basis of age, gender, sexual orientation, race, religion, disability, marital status, pregnancy, parental status, political beliefs, nationality, ethnicity, union membership and social status.
- d) At JIT Logistik, we do not accept any discrimination or unequal treatment in employee recruitment, access to training, promotions, salaries, layoffs or retirements.
- e) At JIT Logistik, we condemn any behaviour bearing the hallmarks of disrespecting another person and taking advantage of their inferiority or vulnerability. We strictly prohibit any manifestation of bullying, harassment, human trafficking, violation of personal dignity, and behaviour that creates an intimidating, hostile, degrading, humiliating or derogatory atmosphere for someone in the workplace.

#### **5. Confidentiality, information security, intellectual property**

- a) At JIT Logistik, personal data protection, information security, and data management are given top priority. We are aware of the value of the data we collect and process, which is why we approach data security policies with reverence. We observe the provisions of the regulations on data protection, including the Regulation of the European Parliament and of the Council (EU)

2016/679 of 27.04.2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ("GDPR").

- b) JIT Logistik takes care to protect intellectual property and other data relevant to counterparties.
- c) At JIT Logistik, we process the information acquired in the daily operations of the company only to the extent necessary for business processes. We protect data that are the company's assets, those relating to its employees, customers, partners, subcontractors and other cooperating entities.
- d) At JIT Logistik, we place great emphasis on data protection, and we also require this of our former employees. Contracts with employees, customers, business partners, transport partners enforce confidentiality even after the termination of employment or cooperation relationship.
- e) In our dealings with competitors, we do not create situations that allow the communication of confidential company information.
- f) JIT Logistik does not obtain information on the competition by illegal means such as industrial espionage, hiring competitors' employees to obtain secret information from them, inducing competitors' staff or their customers to disclose information in their possession, and other means not mentioned above.

#### **6. Counteracting corruption, forgery, falsification, counterfeiting, fraud**

- a) JIT Logistik is committed to preventing corruption, unfair competition, forgery, unfairly influencing the decisions of other parties.
- b) JIT Logistik undertakes to prevent the use of counterfeits, forgery of any kind.
- c) JIT Logistik does not take actions to deceive counterparties, falsify documents and activities carried out.
- d) JIT Logistik's principles fit into all laws, regulations, guidelines and standards regarding anti-corruption activities for all activities correlated with daily business practice and socio-economic ethics. All actions of employees and partners should be carried out with respect for the law, good manners, principles of fair competition, not having the features that can be considered corrupt. Preferential treatment, giving or accepting gifts or practices of giving morally charged benefits to participants in the JIT Logistik business area, public officials, partners, potential customers are not allowed.

#### **7. Business compliance, finance and Accounting**

- a) JIT Logistik undertakes to maintain bookkeeping, accounting operations in a complete, accurate and truthful manner and in accordance with applicable law.
- b) JIT Logistik undertakes to comply with export restrictions, established embargoes and economic sanctions.
- c) Employees use JIT Logistik's tangible assets and cash, and carry out transactions on behalf of the company based on assigned powers and duties in accordance with the principle of correct accounting under the law.

## 8. Counterparties

- a) Relations between JIT Logistik and counterparties are based on mutual trust and will be conducted in accordance with applicable law.
- b) We care about fair competition with other companies. We comply with all applicable antitrust regulations and laws on combating unfair competition, both domestic and European ones.
- c) We do not participate in collusions and do not take any action to influence prices or terms and conditions, to allocate sales territories or customers, or to restrict free competition.
- d) We do not undertake activities that may constitute a conflict of interest.
- e) We undertake not to enter into agreements with customers and suppliers that restrict their freedom to autonomously set prices and other terms and conditions (provisions on prices and conditions). We will promptly report information about activities that are contrary to the principles of fair competition to the relevant management personnel. Questions relating to what is permissible under the under consumer law.
- f) Payment for the service rendered or goods delivered will be paid on time and in accordance with the contract.
- g) JIT Logistik competes fairly with its competitors and does not undermine their reputation. The company will be guided by the principles of ethical behaviour towards counterparties.
- h) JIT Logistik does not use restrictive trade practices that are not in compliance with the law.

## 9. Community involvement

- a) At JIT Logistik, we help the weak and needy. As a conscious organization, we actively oppose violence and feel obliged to counteract such phenomena to the best of our Organization's ability.
- b) JIT Logistik seeks to activate the school and academic community professionally, undertaking cooperation with educational institutions, universities. We offer internship programmes and jobs for students, undergraduates and graduates in transportation and logistics-related fields.
- c) JIT Logistik respects the rights of the local community, the rights of minorities to live according to its own rules.
- d) JIT Logistik respects a right to a dignified life and development as well as property rights and the right to land.
- e) JIT Logistik does not use any form of coercion or pressure to influence anyone's decisions. JIT Logistik does not use any forces/groups that could influence decisions others or might limit their rights.
- f) JIT Logistik does not use any private or public security forces that could affect the lives, safety of people, any groups, restrict their rights or influence their decisions.

## 10. Environmental protection

- a) JIT Logistik requires its employees and all partners to have an environmentally friendly attitude and take actions to protect the environment.
- b) JIT Logistik places great emphasis on implementing and respecting international environmental principles. We strive to reduce the negative environmental impact through responsible use of electricity, water, gas and fuels: diesel, gasoline.
- c) JIT Logistik is going to introduce to our own fleet vehicles with alternative fuel.

- d) In an effort to minimize the use of natural resources, JIT Logistik is implementing internal practices that reduce the level of natural resource use. JIT Logistik expects an identical attitude from its business partners.
- e) JIT Logistik undertakes to take into account sustainable biodiversity, soil and water protection, and the possibility of using solutions that reduce the burden on the environment (renewable energy, recycling, decarbonisation) when conducting and developing its activities.
- f) A detailed description of JIT Logistik's environmental practices is available in the Environmental Policy.

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## 11. Supervision of the application of the Code

At JIT Logistik, we have appointed a representative from the managerial staff who is responsible for compliance of conduct with this Code of Conduct – this is the Compliance Commissioner. In addition, a person responsible for the implementation of ethics, correctness and compliance standards has been appointed for each JIT Logistik location.

Employees and partners of JIT Logistik have the opportunity to report irregularities whenever there has been or may have been a violation of the rules of conduct adopted and in force in the JIT Logistik community.

## 12. Reporting violations:

Notification of violations can be made by e-mail to the Compliance Commissioner. E-mail address: [compliance@jitlogistik.com](mailto:compliance@jitlogistik.com)

Or the notification should be sent by conventional mail with a letter marked "Compliance" directly to the Compliance Commissioner at:

**JIT Logistik Sp. z o.o. Sp. k.  
ul. Sowińskiego 69  
63-400 Ostrów Wielkopolski**

The company has implemented an ethical escalation procedure that must be followed.