CODE OF CONDUCT

Effective date: 01.12.2024

Preamble

The Code of Conduct is an integral part of our corporate culture. It aligns with our corporate values and establishes the rules of conduct for employees toward one another and external partners.

It commits us to act in compliance with applicable laws, other generally binding legal regulations, and internal guidelines, fostering our integrity, transparency, and accountability in our activities. It is based on ethical principles of respect for human dignity, honesty, tolerance, responsibility, duty, and fairness.

Ethical behavior is crucial for the long-term operation and economic interests of our company and reflects our responsibility toward all partners. The good name and trust of our customers are among our most valuable assets. Protecting these is a priority for our company and for every employee, requiring decisions rooted in morality, ethics, and compliance with legal standards.

We are committed to preventing and addressing any violations of the Code of Conduct and will take appropriate corrective actions as necessary. All stakeholders connected to our company are encouraged to report any violations or suspected breaches of the Code of Conduct orally, in writing, by email, or by telephone.

Contact Information for Reporting Violations:

- **Head of Department**
- **Human Resources Manager:**
    - Email: wlshr@wls-group.eu or prospolcin@wls-group.eu
    - Phone: +421(0)2 4025 9513
    - In writing: Submit to the suggestion box or HR at:
      Weindel Logistik Service SR spol. s r.o., Diaľničná 2, 903 01 Senec
- **Managing Director**

WLS strictly prohibits any form of retaliation, discrimination, or disciplinary action against individuals who, in good faith, report suspected, attempted, or actual misconduct or violations of the Code of Conduct. All submissions are taken seriously, treated confidentially, and handled with full respect for the anonymity of those who request it. Every report is investigated fairly, objectively, and in a timely manner.

1 INTEGRITY OF OUR BUSINESS

1.1 Compliance with Laws, Regulations and Standards

Each employee is responsible for adhering to all applicable laws, regulations, and standards, including company policies and rules. Employees must not make decisions that conflict with any regulations.

It is an employee's duty to stay informed about the laws and guidelines relevant to their duties and role. They must report any questionable behavior or actions by colleagues or business partners.

Employees must protect information belonging to the company or related to its business activities. Such information is confidential and may only be used for business purposes—not for personal gain or third-party benefit. Employees must avoid actions that could result in the unauthorized use or disclosure of this information. This obligation continues even after an employee leaves the company.

WLS promotes open communication between employees and departments. Concealing information that could enhance work quality or address issues affecting professional or social relationships is considered unethical.

WLS is committed to complying not only with legal obligations but also with the highest ethical standards. These commitments foster trust, responsibility, and transparency in all aspects of our business operations.

1.2 Anti- Corruption Efforts

Our company upholds a zero-tolerance policy towards bribery; all employees are required to comply with all applicable anti-bribery laws and regulations.

We actively combat corruption, do not offer or accept bribes, and do not permit any other person to give or accept bribes on our behalf. We support efforts to eliminate corruption and financial crime.

Additionally, every employee is obligated to prevent, detect, and fight all types of fraud.

WLS will not enter into business relationships with anyone involved in corrupt practices, and we will terminate business relationships with such entities.

1.3 Conflict of Interest

All our decisions are made independently and objectively. WLS does not permit any personal interests to conflict with the interests of the company.

Each employee must manage their private interests in financial, business, or other activities outside WLS in a manner that avoids any actual or potential conflict of interest. These activities must comply with legal standards and the internal policies of WLS. In these activities, employees must not misuse workplace resources, their position within the company, or endanger the company's good reputation.

No employee, in financial, business, or other activities carried out by themselves or their relatives outside the company, may use an advantage or profit from information obtained as part of their job responsibilities at WLS that is not generally available.

Any risk that could represent a conflict of interest must be reported by the employee. Each conflict will be handled confidentially and objectively, with the aim of finding a fair, objective, and protective solution.

An employee may engage in business activities that are aligned with the company's business only with prior written consent from the managing director.

WLS provides regular training for employees to identify potential conflicts of interest and address them properly. Each employee is required to report any conflict of interest in writing to their superior and cooperate in taking measures to resolve it.

1.4 Fair Trade and Competition

We consider competing companies as equal professional partners and view economic competition as a natural part of business. We respect our competitors and are committed to adhering to fair business practices. As a company, we do not tolerate any unfair or anti-competitive practices or cartel agreements.
Our company also requires its business partners and employees to conduct all business activities in accordance with legal regulations.

1.5 Relationships with Customers and Suppliers

WLS prioritizes customer satisfaction and strives to provide a seamless customer experience, supported by long-term partnerships with suppliers.

Employees must interact professionally, courteously, and honestly with customers and suppliers. Integrity and respect form the foundation of sustainable relationships with our business partners.

We safeguard the property and reputation of our customers and protect their confidential business information in accordance with applicable laws and contractual obligations.

2 EMPLOYEE RELATIONS

2.1. Leadership Responsibilities

The key role and mission of our managers is to motivate employees and support their professional growth in order to achieve common goals. They are responsible for creating a psychologically safe environment that allows all employees to communicate openly and without fear, ask questions, and share their concerns and ideas. Managers have an increased responsibility to lead with integrity and be a role model for their colleagues.

Managers are also responsible for ensuring the availability and implementation of our ethical code and other applicable rules and guidelines.

2.2 Protection of Personal Data

WLS respects the privacy of individuals and processes personal data in compliance with applicable laws. We implement strict security measures to protect data against unauthorized access, loss, or misuse.

2.3 Respect for Human Rights

Human rights are universal values that govern our behavior in every aspect of our activities. Our company is committed to respecting and promoting all fundamental human rights and freedoms as outlined in international agreements and national laws (Universal Declaration of Human Rights (UDHR)), as well as the internationally recognized standards of the International Labour Organization (ILO).
Our goal is not only to uphold human rights but also to actively support them across our entire value chain and contribute positively to society in the field of human rights. We support the protection of human rights and condemn all forms of human rights violations.
In the context of human rights protection, we adhere to the following principles:

2.3.1 Voluntary Employment

- Our employees, as well as our business partners, suppliers, and subcontractors, must adhere to the Universal Declaration of Human Rights. They must not engage in human trafficking; destroy, conceal, confiscate, or otherwise deny an employee access to their identification documents or other personal papers; use misleading or fraudulent recruitment practices, such as withholding or fundamentally misrepresenting key employment terms, including salary, employee benefits, work location, living conditions, housing, and related costs.
- Employment relationships must be in writing and based on the free and voluntary decision of both parties.
- Employees have the right to terminate their employment and must have the opportunity to leave their job with appropriate notice as required by applicable law.
- WLS actively monitors its supply chains in accordance with applicable laws and contractual terms to identify and prevent any practices of forced or illegal labor. Contracts with suppliers include clauses prohibiting forced labor, and we regularly conduct audits to ensure compliance.

2.3.2 Freedom of Association

- Employees have the right to freely associate, join and actively participate in trade unions or employee representative bodies, and engage in constructive social dialogue.
- If the right to association is restricted by law, employees have the opportunity to use alternative means of representation.

- The management of WLS creates an environment where every employee can freely express their opinion without the risk of intimidation or sanctions. Meetings between employees and representatives are allowed without restrictions.

2.3.3 Safe Working Conditions

- WLS is committed to creating a healthy, safe working environment and complying with all applicable laws and regulations related to workplace health and safety.
- Our workplaces are equipped with adequate lighting, ventilation, sanitary facilities, and protection against risks. Employees have access to clean restrooms, drinking water, and sanitary facilities for storing food. All necessary protective equipment is also provided to employees.
- Employees have the opportunity to regularly provide feedback about the working environment through anonymous surveys or by submitting suggestions to the suggestion box, which allows the company to continuously improve safety standards and working conditions.

2.3.4 Prohibition of Child Labor

- Our company is committed to adhering to child protection rules, prohibiting child labor, and supporting the healthy development, education, and well-being of children. We categorically reject all forms of child labor and require our partners, suppliers, and subcontractors to adhere to these principles. In the event of a violation of these rules, the company reserves the right to immediately terminate the cooperation.
- The minimum age of our employees is always in accordance with international standards or local legal regulations, with the higher of these age limits being applied.
- WLS implements a zero-tolerance policy for child labor and requires all its partners to provide evidence of compliance with international standards. This includes the obligation to regularly provide documentation confirming the age of their employees.

2.3.5 Fair Compensation

- WLS is committed to complying with all standards and legal requirements to ensure fair and transparent compensation. We believe that decent wages contribute not only to social justice but also to sustainable growth and employee satisfaction.
- We ensure that all employees are informed about all aspects of their pay, including base salary, bonuses, allowances, deductions, and any other compensations.
- In addition, we support pay equity and gender equality for the same job positions at all career stages, for example, by establishing standardized base salaries that are reviewed annually in line with local market conditions.

2.3.6 Working Hours

- The working hours of our employees comply with local laws and international standards.
- The average weekly working hours for an employee, including overtime, shall not exceed 48 hours, unless permitted by law or collective agreements.
- Overtime compensation is at least in accordance with legislative standards.

2.3.7 Non-Discrimination

- Our company is committed to the prohibition of any form of discrimination, particularly discrimination based on race, skin color, gender, age, language, religion, political or other opinions, ethnic, national or social origin, property, gender, sexual orientation, or any status, including marital or parental status, or any other category protected by the legal regulations of individual countries.
- We support and value diversity in people, opinions, talents, and experiences. Our goal is also to create an open work environment that addresses individual needs and enables our employees to leverage their unique strengths.
- We avoid discrimination in hiring, training, career development, compensation, and employee dismissal. Employee selection, career development, and compensation are transparent and fair.

2.3.8 Stable Employment

- We place great emphasis on ensuring stability and security for all our employees. Our goal is for every employee to feel confident that they are part of a company that values their work and provides conditions for both their professional and personal stability. We believe that a stable work environment is key to their satisfaction, development, and productivity.
- We offer our employees transparent employment contracts and create conditions that ensure long-term cooperation. We strive to build mutual trust and security in the employment relationship by providing fair compensation and a regular income.
- We invest in the education and development of our employees so that they can grow with us. We organize training, courses, and offer career advancement opportunities within the company.

2.3.9 Dignity and Respect

- We strive to create an environment in which every employee feels valued, respected, and supported. We believe that only by doing so can we build long-term and meaningful relationships that benefit individuals as well as the entire company.
- Every employee is unique to us. We value diversity and promote inclusion, creating a space for the free expression of opinions, talents, and abilities.
- We guarantee equal opportunities for all, regardless of gender, age, nationality, religion, or any other differences. We ensure that every employee feels fairly and justly evaluated.
- We support open and respectful communication at all levels. We listen to and take into account the opinions and needs of every team member.
- We aim to create an environment where everyone is protected from discrimination, harassment, or any inappropriate behavior. Every employee has the right to file a complaint if they feel disadvantaged or if they are treated unfairly. All complaints are addressed thoroughly, transparently, and with the utmost sensitivity to ensure a fair assessment and protection of the rights of all parties involved.

3 SAFETY, HEALTH AND ENVIRONMENT

3.1 Health and Safety

The safety and health of our employees are our top priority. Everyone is required to follow safety rules and act in a way that does not put themselves or others at risk of harm to health and life, especially by using the prescribed personal protective equipment that is capable of performing its function properly.

We ensure that all our employees are familiar with applicable laws and regulations and regularly attend relevant training concerning workplace health and safety requirements.

We also strive to support the mental health of our employees by continuously improving the quality of life at the workplace, ensuring a balance between professional and personal life, and promoting positive relationships among colleagues.

3.2 Environmental Responsibility

WLS supports environmental innovations and actively participates in projects aimed at reducing emissions, protecting biodiversity, and increasing environmental awareness within its community. Every employee is encouraged to adopt sustainable practices through internal initiatives and training. We are committed to minimizing the negative impact of our activities on the environment, actively contributing to its protection, and supporting efforts toward sustainable development, particularly through:

- Optimizing the consumption of energy, water, and raw materials in all our processes to reduce emissions and waste production.
- Waste separation and recycling.
- Investing in technologies and processes that are environmentally friendly and support long-term sustainability.
- Taking measures to reduce our carbon footprint and supporting initiatives aimed at combating climate change.
- Educating employees and collaborating with partners to promote sustainable solutions.
- Developing community activities and supporting employee volunteering.

FINAL PROVISIONS

This Code applies to all employees and associates, including contractors and temporary staff. Suppliers, partners, and collaborators are also expected to adhere to these principles.

Suggestions for improving the Code can be submitted to the HR Department or company management.

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