



# Customer Code of Conduct

## Business conduct

As Poland's leading intermodal operator, logistics-solutions provider and reliable partner for entities seeking cargo transport, Loconi Intermodal actively participates in and enables the smooth flow of goods, thus helping to build an approach focused on sustainable development.

We are committed to upholding the highest ethical standards and integrity in our business, with a sense of responsibility towards our clients, our employees, our partners, local communities, and the environment.

Loconi Intermodal makes every effort to ensure that our approach and relationships reflect and reinforce our commitment to the highest standards of excellence, while remaining consistent with Loconi Intermodal's Code of Ethics and Business Conduct. This Customer Code of Conduct (the 'Customer Code of Conduct') sets out Loconi Intermodal's expectations and our shared commitment to ethical conduct, which will doubtless strengthen the reputations of both Loconi Intermodal and the Customer.

## Applicability

**The Customer Code Of Conduct Is Applicable To All Persons, Agents Or Entities: (I) Buying Products Or Services From; Or (Ii) Co-Operating With Loconi Intermodal, Its Subsidiaries, Branches, Affiliates, Organizational Units, Authorized Representatives And/Or Subcontractors (Collectively 'Loconi') As Business Partners Or As Part Of A Business Venture.**

The Customer Code of Conduct defines the business and conduct standards for Loconi Intermodal customers, business partners, and their representatives. It provides guidelines for conduct expected of all Loconi Intermodal customers and business partners, their representatives, distributors, subsidiaries, affiliates, subcontractors and all parties acting on their behalf (collectively the 'Customer' or 'Customers'). Loconi Intermodal expects Customers to comply with the standards set out in this Code.

In accordance with the Customer Code of Conduct, Customers are required to comply with all applicable laws, adhere to the highest ethical, personal, and professional standards, and fulfil their obligations in a timely manner.. Customers must avoid any undertakings, actions, or conduct that could adversely affect the reputation or Loconi Intermodal.

The Customer Code of Conduct does not provide a complete list of all matters or situations that a Customer could face. Neither does it replace contractual terms or detailed rules or guidelines arising from the applicable provisions of the law relating to the Customer's activities. Loconi Intermodal respects and acknowledges local legal variations.

## Bribery and corruption

**Loconi Intermodal complies with applicable anti-corruption and anti-bribery laws in the countries where it does business.**

Therefore, Customers must, in particular:

- not directly or indirectly offer or make any unauthorized, unlawful or improper payments on behalf of Loconi Intermodal;
- refrain from directly or indirectly inducing anyone to unlawful or improper action or omission;
- maintain appropriate channels for reporting information on or suspicions of offering or receiving unlawful or improper payments;
- not directly or indirectly offer, promise or accept any kind of bribe, unlawful payment or benefit (in whatever form).

Customers must implement appropriate anti-corruption policies. It should be noted that gifts, favours and entertainment must be approached with caution and in accordance with all applicable provisions of the law.

## Bribery and corruption

**Business gifts and other benefits may be provided to employees of the Loconi Intermodal only if:**

- consistent with generally accepted business practice and ethical standards;
- not intended to influence business decisions or obtain business advantage and not giving the appearance of such intention;
- not provided in the expectation of creating or obtaining any benefit or favour;
- transparent and not intended to conceal anything whatsoever;
- not violating the applicable laws or rules of any country, public authority or company concerned;
- not causing embarrassment to Loconi Intermodal upon disclosure;

Loconi Intermodal takes a strict approach to bribery and will take all necessary legal action or other punitive measures in response to any misconduct or breach of the Customer Code of Conduct, including, without limitation, the termination of services to the Customer.

## Anti-money laundering

Loconi Intermodal's policy is to comply with applicable anti-money-laundering provisions. Money laundering is the process by which proceeds of illegal activities (such as unlawful gambling or drug trafficking) are disguised to appear legitimate.

Loconi Intermodal does business exclusively with entities that can demonstrate the source of their funds and conduct legitimate operations.

## Sanctions regulations

**Loconi Intermodal operates in accordance with applicable sanctions regulations, and requires all Customers to comply with all relevant sanctions regulations and to understand their impact on the relationship with Loconi Intermodal.**

Customers are required to comply with all applicable laws and regulations concerning the services provided by Loconi Intermodal, including without limitation import and export controls and related restrictions, such as dealings with sanctioned countries, entities, individuals, and/or products.

Loconi Intermodal Customers are responsible for understanding their regulatory obligations regarding applicable sanctions and import/export control laws. Prior to the import, export, re-export, or release of goods to Loconi Intermodal, Customers must ensure they have obtained all required export licenses and other authorizations or permits required by law.

If a Customer relies on an exemption from the requirement to obtain appropriate permits, it shall be responsible for verifying its validity and adequacy. Customers are expected to maintain documentation of the permits relied upon in a given transaction for the purpose of audits by the relevant authorities.

## Sanctions regulations

Failure to comply with applicable sanctions laws carries severe consequences, including imprisonment, substantial fines for legal entities or individuals, reputational damage, and a potential restriction on the ability to provide services to Loconi Intermodal's clients and partners, submit bids, or undertake and execute new business projects.

Loconi Intermodal does not support or provide services to Customers who attempt to circumvent or evade compliance with applicable sanctions laws. In the case of a violation or suspected violation of sanctions regulations by a Customer, Loconi Intermodal will take all necessary action. A Customer who becomes aware of a potential or actual sanctions violation shall immediately notify Loconi Intermodal, providing full details. Loconi Intermodal takes sanctions violations by Customers seriously and reserves the right to take any necessary steps, including termination of the agreement and/or notification of the relevant authorities.

## Health and safety

**Loconi Intermodal fully complies with applicable laws and consistently applies an approach aimed at both preventing security breaches and promoting a culture of security awareness.**

Customers must ensure they possess the legally required documents and permits authorizing entry onto Loconi Intermodal's premises. Furthermore, Customers must follow Loconi Intermodal's instructions and use designated routes. Customers are required to comply with all safety and security rules applicable on Loconi Intermodal's premises.

Loconi Intermodal categorically opposes all forms of verbal and physical violence in the workplace and expects Customers to act in accordance with these principles. In line with the expectations of Loconi Intermodal, our customers and stakeholders, every employee should perform their duties without the influence of substances or activities that could adversely affect workplace safety and efficiency. The use, possession (excluding medications), distribution, purchase, or sale of alcohol or intoxicating substances, including drugs, by anyone while on Loconi Intermodal's premises or while operating Loconi Intermodal's equipment or devices is prohibited.

For detailed information, please refer to Loconi Intermodal's OHS guidelines.

## The environment

**Loconi Intermodal attaches great importance to sustainable development and environmental protection. Loconi Intermodal makes every effort to fully comply with all applicable environmental laws and regulations.**

Loconi Intermodal's commitment to environmental protection is reflected in our practices ensuring that business operations are conducted in a manner that is both ecologically and economically responsible.

Customers using Loconi Intermodal's services must comply with environmental protection requirements on and around Loconi Intermodal's premises, acting in a responsible and safe manner. If a potential hazard or security issue regarding cargo or goods is identified, the Customer is required to immediately report it to a Loconi Intermodal representative on-site.

Customers who transport or handle hazardous materials are required to ensure their safety and proper handling. Furthermore, Customers must notify the appropriate Loconi Intermodal's representative of any issues, accidents, or spills involving hazardous materials that occur while on Loconi Intermodal's premises or in its immediate vicinity.

## Confidential information

**Information that has not been officially released to the public by Loconi Intermodal must be deemed confidential unless otherwise indicated.**

Confidential information may be disclosed to external entities exclusively by authorized employees of Loconi Intermodal. Unauthorized use or disclosure of information concerning Loconi Intermodal is prohibited and may constitute a criminal offence.

## Cybersecurity and data protection

Loconi Intermodal applies and implements internal cybersecurity policies that comply with relevant regulatory requirements, industry standards, and best practices to protect its IT infrastructure against dynamically evolving cybersecurity threats.

**Customers are responsible for implementing sufficient controls to ensure the confidentiality, integrity and availability of the information they store or process.. Loconi Intermodal requires all Customers to have appropriate, up-to-date security processes and measures in place to prevent, mitigate, and minimize cybersecurity threats and breaches, in order to protect Loconi Intermodal's systems, infrastructure, and data from potential harm.**

## Fair trade

**In accordance with Loconi Intermodal's policy and expectations, Customers are required to comply with all antitrust and fair-competition laws in the jurisdictions where they operate.**

Customers must avoid any discussions, exchanges of information, or agreements concerning strategic data that could violate applicable antitrust or competition laws.

## Conflicts of interest

**Customers should avoid situations that may lead to potential conflicts of interest, regardless of whether entering into a potential agreement is in the best interest of Loconi Intermodal.**

Customers must disclose any potential or actual conflict of interest regarding potential cooperation with Loconi Intermodal. Failure to disclose such information may be interpreted as an attempt to unduly influence the Loconi Intermodal and may result in the termination of services to the Customer

## Personal data protection

In countries with applicable provisions governing the collection, use, disclosure and deletion of personal data, Loconi Intermodal expects Customers to comply with all applicable provisions relating to personal-data protection. Customers must also ensure that information is not disclosed in an inappropriate or unauthorized manner in violation of the applicable provisions of the law.

## Fraud

**Loconi Intermodal will not tolerate fraud on the part of its Customers. All Customers shall ensure the existence of appropriate controls. If fraud is identified in relation to any transaction with Loconi Intermodal, the Customer shall notify Loconi Intermodal of this fact without delay.**

In the case of allegations involving fraud, corruption or bribery, Loconi will notify the relevant law-enforcement authorities and will fully co-operate in any proceedings. If needed, Loconi Intermodal will take appropriate action, including without limitation termination of the agreement or of provision of services to the Customer.

## Social media

If Loconi Intermodal identifies any inappropriate, false, or negative comments, images, videos, or audio materials concerning Loconi Intermodal published online by the Customer or the Customer's employees, Loconi Intermodal reserves the right to demand that the Customer immediately remove any content deemed negative or harmful to Loconi Intermodal.

## Reporting of violations

Customers must implement appropriate processes to enable their employees to report concerns or doubts regarding legal violations or unethical conduct.

# The Customer's statement

The Customer shall confirm having reviewed the Customer Code of Conduct and agrees that all of the Customer's operating units, subsidiaries or affiliates, branches, subcontractors, and authorized representatives working with Loconi Intermodal shall comply with the provisions of the Customer Code of Conduct.

Failure by the Customer to comply with any part of the contractual terms or of the Customer Code of Conduct may result in Loconi Intermodal's withdrawal from existing orders and termination of the business relationship with the Customer.

The Customer moreover understands that compliance with the Customer Code of Conduct does not place Loconi Intermodal under any obligation to work with the Customer, nor does it prevent Loconi Intermodal from the exercise of any of its rights arising from contractual clauses or from the terms of the agreement.

**Loconi Intermodal S.A.**

ul. Łużycka 8A,  
81-537 Gdynia

email: [loconi@loconi.pl](mailto:loconi@loconi.pl)



[www.loconi.pl](http://www.loconi.pl)



@Loconi Intermodal