



Supplier 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 customers, our employees, our partners, local communities, and the environment.

In pursuit of the highest standards, we expect every supplier to reflect and reinforce this commitment, and to conduct their business in line with the principles of the Supplier Code of Conduct and other ethical codes applicable at Loconi Intermodal. This Supplier Code of Conduct (the 'Supplier 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 Supplier.

Applicability

The Supplier Code of Conduct applies to entities working with Loconi Intermodal on any legal basis as direct or indirect providers or subcontractors of services or suppliers of goods to Loconi Intermodal.

Through the Supplier Code of Conduct, Loconi Intermodal defines the expected standards of conduct for all suppliers, subcontractors and business partners, including their subsidiaries and affiliates ('Supplier' or 'Suppliers'). Every Supplier must adhere to the standards set out in the Supplier Code of Conduct.

In line with the Supplier Code of Conduct, all Suppliers must comply with the applicable law, follow the highest ethical, personal and professional standards and reliably meet their obligations. Suppliers must refrain from any undertakings, actions or conduct that could negatively impact the reputation or good name of Loconi Intermodal.

The Supplier Code of Conduct does not provide an exhaustive list of all possible issues or situations a Supplier could face. It does not replace contractual provisions or more detailed rules and guidelines arising from the legal provisions governing the Supplier's business. Loconi Intermodal 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, Suppliers must, in particular:

- not directly or indirectly offer or make any unauthorized, unlawful or improper payments on behalf of Loconi Intermodal;
- not directly or indirectly induce anyone to engage in any 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).

Suppliers are furthermore expected to establish an appropriate anti-corruption policy

Suppliers should note 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 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 Supplier Code of Conduct, including, without limitation, the termination of the Supplier's services.

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 Suppliers to comply with all relevant sanctions regulations and to understand their impact on the relationship with Loconi Intermodal.

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 customers and partners, submit bids, or undertake and execute new business projects.

In the case of any breach or suspected breach of sanctions regulations by the Supplier, the Supplier shall immediately notify Loconi Intermodal in accordance with the applicable agreement. Loconi Intermodal regards any violation of sanctions regulations with the utmost seriousness and will take appropriate legal action in response to any breach, including the possibility of terminating the provision of services or the supply of goods by the Supplier to Loconi Intermodal.

Health and Safety

Loconi Intermodal complies with applicable regulations and market standards in the jurisdictions where it operates (industry regulations) and implements systemic solutions both to prevent security breaches and to promote a culture of safety. Occupational health and safety (OHS) are priority business matters requiring continuous monitoring, assessment, and improvement.

Loconi Intermodal categorically opposes all forms of verbal and physical violence in the workplace and expects Suppliers 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.

Persons under the influence of alcohol or intoxicating substances, including drugs, are prohibited from entering Loconi Intermodal's premises, participating in Loconi Intermodal's activities, or operating Loconi Intermodal's equipment or devices. For detailed information, please refer to Loconi Intermodal's OHS guidelines.

The Environment

Loconi Intermodal is guided by the principles of long-term sustainable development and environmental protection. The Company fully respects applicable local environmental laws.

Commitment to environmental protection is an integral part of our policies, programmes and practices aimed at conducting business responsibly while considering both environmental and economic aspects.

Investment decisions and the selection of Suppliers that Loconi Intermodal intends to work with are preceded by an analysis of all relevant information to ensure that environmental aspects are appropriately considered.

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.

The obligation to maintain the confidentiality of Loconi Intermodal does not apply where disclosure is requested by competent judicial, regulatory, governmental, or administrative authorities pursuant to applicable laws.

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.

Suppliers should ensure the implementation of sufficient controls to guarantee the confidentiality, integrity and availability of the information they store or process. Loconi Intermodal expects all Suppliers to have appropriate and up-to-date processes and security measures in place to prevent, mitigate and minimize the risk of cybersecurity threats or breaches, thereby ensuring the protection of Loconi Intermodal's systems, infrastructure, and data.

Fair Trade

The Company expects Suppliers to comply with all antitrust and fair-trade laws.

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

Conflicts of Interest

Suppliers should avoid actual or potential conflicts of interest in relation to any undertakings, regardless of whether a given contract is beneficial to Loconi Intermodal.

Suppliers are obliged to report the existence of any potential or actual conflict of interest. Failure to do so may be deemed an attempt to influence Loconi Intermodal or the bid-evaluation process and may lead to disqualification and potential exclusion from future tenders or proceedings organized by Loconi Intermodal, or the termination of the Supplier's services or supply of goods.

Fraud

Loconi Intermodal will not tolerate fraud on the part of its Suppliers. Accordingly, all Suppliers are expected to implement appropriate controls. If fraud is identified in relation to any transaction with Loconi Intermodal, the Supplier must notify Loconi Intermodal of this fact.

Loconi Intermodal will notify the competent law-enforcement authorities and will co-operate fully in any ongoing proceedings. Loconi Intermodal will, where justified, take appropriate action, including the termination of the agreement or of the Supplier's services or supply of goods, in accordance with applicable laws.

Social Media

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

Reporting of Violations

Suppliers are required to implement appropriate procedures to enable their employees to raise concerns regarding violations of the law or unethical conduct.

Supplier's acknowledgement of having read and understood the Code

The Supplier shall confirm, in the form specified by Loconi Intermodal, having reviewed the Supplier Code of Conduct and agrees that all of the Supplier's organizational units, subsidiaries or affiliates, branches, subcontractors, and authorized representatives working with Loconi Intermodal shall comply with the provisions of the Supplier Code of Conduct.

Any breach by the Supplier of the terms of the agreement or of the Supplier Code of Conduct may result in Loconi Intermodal's withdrawal from or termination of the concluded agreements and the termination of the business relationship with the Supplier.

The Supplier understands that the acceptance of the Supplier Code of Conduct does not constitute an obligation on the part of Loconi Intermodal to co-operate with the Supplier or to place orders with the Supplier.



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