

# Code of Conduct

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**We believe in a better logistics world**

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# Foreword

"We believe  
in a **better** logistics world  
created by the natural talent  
of intelligent people."



UnitCargo is a truck forwarding company with head office in Vienna, Austria and branch offices in Bulgaria, Poland, Romania, Serbia and Slovakia. Our core business is FTL, LTL and intermodal transport in the corridor Scandinavia, Benelux, Germany via Central and Eastern Europe to the Balkans.

We consider the three pillars of our organisation - customers, employees and suppliers - to be equal and important, based on mutual respect and appreciation. We strive to reconcile business conduct with ethical values and social responsibility in such a way that our service meets today's requirements for ethical conduct, safety, legal compliance, anti-corruption, fair competition and sustainability.

Therefore, we ask you to carefully read and faithfully operate in accordance with the principles and requirements, as applicable, in this Code of Conduct, and in full compliance with all Applicable Laws and Regulations.

If you have any questions or queries, please contact your UnitCargo contact person or the UnitCargo legal department at [legal@unitcargo.at](mailto:legal@unitcargo.at) directly.

Vienna, 18/12/2023

A handwritten signature in black ink, which appears to read "Davor Sertic".

Mag. Davor Sertic, MBA  
(CEO)

# Who must follow the code

## All Employees, Subsidiaries, and Controlled Affiliates

The Code of Conduct applies to all full and part-time employees of UnitCargo and its subsidiaries, and provides a standard guide for what is required of everyone at UnitCargo.

UnitCargo furthermore expects that all majority-owned subsidiaries of UnitCargo, as well as affiliated companies under the control of UnitCargo will adopt policies consistent with this Code of Conduct.

## Business Partners

We seek to deal with third parties who share our values. We expect employees who deal with third parties to require full compliance with relevant aspects of UnitCargo's Code of Conduct.

A third party is anyone who does business with UnitCargo, including:

- Suppliers
- Carriers
- Consultants
- Independent Contractors
- Contract workers
- Customers

## Failure to Comply

Failure to comply with your commitments as per this Code of Conduct may lead to severe consequences, including the termination of our business relationship or changes to its Terms and Conditions.

# Our Principles

UnitCargo is committed to respecting the highest standards of labor, human rights, and environmental and ethical conduct. This applies to every business decision in every area of the company. The following principles guide UnitCargo business practices:

- **Honesty** - Demonstrate honesty and high ethical standards in all business dealings
- **Respect** - Treat customers, partners, suppliers, employees and others with respect
- **Confidentially** - Protect UnitCargo's confidential information and the information of our customers, partners, suppliers and employees
- **Compliance** - Ensure that compliance stands at the forefront of business decisions and adhere to applicable laws and regulations

UnitCargo expects its employees as well as its suppliers, consultants and other business partners to follow these principles when providing goods and services to UnitCargo or acting on our behalf.

## Your Responsibilities and Obligation to Take Action

By representing UnitCargo, everything you do is a reflection of all of us.

Follow the policy. Comply with the spirit of UnitCargo's code of conduct and the applicable requirements.

Speak up. If you see or hear any violation of UnitCargo's Code of Conduct Policy, other UnitCargo Policies, or legal or regulatory requirements, you must notify either your manager, UnitCargo contact person or UnitCargo's legal team at [legal@unitcargo.at](mailto:legal@unitcargo.at)

Use good judgment and ask questions. Apply UnitCargo's Code of Conduct principles and review our policies and legal requirements. When in doubt about how to proceed, discuss it with your manager, UnitCargo contact person or UnitCargo's legal team at [legal@unitcargo.at](mailto:legal@unitcargo.at)

## Human Rights

UnitCargo is committed towards respecting internationally recognized human rights. UnitCargo's approach to respecting human rights is based on the United Nations' "Guiding Principles on Business and Human Rights", the global standard on business and human rights.

# Ethics and Human Rights

Respectful interaction is one of the primary values that UnitCargo stands for. Respectful, topic-related communication that conveys professional competence and appreciation is essential for sustainable cooperation. As a business partner, you undertake to support us by adhering to the following values:

## Values

We expect from you as a business partner to support these following values such as reliability, honesty, courtesy and fair working conditions towards your own employees.

## Equal Opportunities and Diversity

We embrace and celebrate diversity in our workforce, valuing unique perspectives and backgrounds of every individual. We are committed to creating an inclusive environment that fosters respect, dignity and equal opportunity for all participants, regardless of race, ethnicity, gender, sexual orientation, religion, age, disability or any other characteristic. We expect the same from our business partners.

## Adequate Remuneration for Employees

We advocate for the adequate remuneration of our employees in accordance with the applicable legal regulations and expect likewise from our business partners.

## Freedom of Association

We deeply value and respect the principle of freedom of association. We believe that individuals have the right to freely form, join and participate in associations and organizations of their choice without fear of discrimination or coercion.

## Compliance with Legal Standards

We strictly believe in and adhere to all legal standards related to working time. We prioritize compliance with applicable laws and regulations, governing hours, breaks, overtime and rest periods. We similarly expect the adherence to these values from our business partners.

# Ethics and Human Rights

## Prohibition of Forced Labor, Child Labor and Human Trafficking

UnitCargo is dedicated towards ensuring that all work is voluntary. We stand against the trafficking of people or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt or employment of persons by means of threat, force, coercion, abduction, fraud or payments to any person having control over another person for the purpose of their exploitation.

Partners shall not withhold their workers' original government-issued identification and travel documents. Partners shall ensure that their workers' contracts clearly convey the conditions of employment in a language understood by the workers.

## Reporting of Ethics and Human Rights violations

In the event of occurrence or suspicion of an ethical and/or human rights violation by UnitCargo/UnitCargo employees, the observing party is strongly encouraged to report this activity to UnitCargo's legal department at [legal@unitcargo.at](mailto:legal@unitcargo.at).

If a business partner observes a violation, they are strongly encouraged to report this activity and circumstance with UnitCargo's legal department.

# Workplace Behaviour

## Drugs and Alcohol

UnitCargo is deeply committed towards the health and safety of its employees. Employees are expected to comply with UnitCargo's guidelines regarding alcohol, drugs and smoking, whether it is in the workplace or while conducting UnitCargo's business. Employees are not permitted to be under the influence of any legal or illegal drug that impairs the ability to perform their job or using any illegal substances in the workplace or while working. We strongly encourage our business partners to act similarly.

## Anti-Discrimination

UnitCargo stands against all forms of discrimination against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership or any other status protected by applicable national or local law, in hiring and other employment practices. Business partners shall not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety and shall not improperly discriminate based on test results.

## Anti-Harassment and Abuse

UnitCargo is committed to a workplace free of harassment and abuse. It is not allowed to threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion and sexual harassment.



# Health and Safety at Work

At UnitCargo, safety, security and health are integral parts of our operations and as such we approach them with the same level of commitment as we do with any business-related activities.

UnitCargo's operations are conducted in thorough compliance of the applicable health, security and safety laws and regulations, company standards and best practices. We take all reasonable and practical steps to ensure that we provide a safe, secure, healthy and clean working environment.

## Responsibilities

UnitCargo's commitment to health and safety involves the active participation of all individuals within our organization:

- Management is responsible for adhering to laws and regulations, resource allocation, risk assessments, and fostering a safety-first culture.
- Employees must comply with policies, report hazards promptly, utilize safety equipment and participate in training.
- Visitors and contractors are expected to follow our health and safety policies and report any unsafe conditions or incidents.

## Safety Procedures and Consequences

Safety procedures encompass emergency response, incident reporting, first aid, safety equipment usage and workplace ergonomics.

For more information, see UnitCargo's Health and Safety policy.

Non-compliance with this policy may lead to disciplinary actions or legal consequences, should it result in significant health and safety breaches. This policy will be reviewed regularly to ensure its continued effectiveness and compliance with applicable laws.

# Anti-Corruption

We at UnitCargo believe in fairness as well as elimination of corruption. Therefore our thoughts and actions are directed against corruption in all its forms and towards supporting high ethical standards.

As a business partner, you undertake to support us in the fight against corruption by adhering to the following rules:

## Not offering or accepting bribery of any kind

Bribery is the offering or promise of gifts or asset benefits for the performance or omission of a particular act, which would not have taken place under ordinary circumstances and without bribery.

Bribery does not include small appropriate gestures of hospitality, which correspond to the general market practices of the industry or country concerned.

However, you should refrain from any practice that has the goal of influencing an employee for his or her own preference.

## Money Laundering, Extortion or Criminal Activities

No involvement in money laundering, extortion or activities that promote criminal activities (e.g. terrorist financing) is allowed.

Money laundering means concealing the illegal origin of assets derived from criminal activities. This furthermore includes activities such as extortion and other forms of corruption.

Money laundering, extortion and terrorist financing not only violate our values, but are also subject to international criminal prosecution.

# Fair Competition and Compliance

UnitCargo attaches great importance to fair competitive conditions for all market participants, free from unfair business practices. We encourage open and honest communication within our organization as well as our business partners. UnitCargo promotes a culture of integrity, where employees are encouraged to report any potential failure to do so.

As a business partner, you and your employees are committed similarly to:

## Fair Competition

Prohibition of measures, which lead to the falsification or distortion of fair competition (e.g. price fixing, misleading advertising statements) is strictly forbidden. UnitCargo is firmly committed to maintaining accurate and truthful records, ensuring compliance with financial, reporting, accounting standards and disclosure requirements.

## Compliance with Anti Trust Law

We expect fair and equitable compliance of all applicable national and international laws and standards. We strive to create an environment that encourages ethical behavior and avoid any interaction that may result in unfair advantage or harm to our competitors, customers or the market as a whole.

## Avoiding Conflicts of Interest

At UnitCargo we believe in ethical judgment where personal interests do not unduly influence our professional judgment. A conflict of interest exists when an individuals' personal interests are inconsistent with those of UnitCargo's and create conflicting loyalties. Individuals must avoid situations where their personal interests conflict, or appear to conflict, with the interests of UnitCargo.

# Dealing with Data and Information

Given that a joint business relationship is a flow of information where partly sensitive data is exchanged, UnitCargo deems it of utmost importance to respect the confidentiality of the information received. To ensure the responsible handling of personal and confidential data we adhere to the following:

## Protection of Personal Data

We prioritize protecting personal data with utmost responsibility, adhering to strict standards of confidentiality and security. We obtain consent for data collection and usage and handle information solely for legitimate purposes. Compliance with data protection laws is paramount and we promptly address any breaches, mitigate risks, and notify affected individuals as required. Our employees are trained on data privacy and understanding their role in maintaining confidentiality. Furthermore we are committed to ensuring that all files, folders and personal information are protected from unauthorized access through encryption.

If you have any questions regarding data protection, please contact us:  
[data-protection@unitcargo.at](mailto:data-protection@unitcargo.at)

For more information, see UnitCargo's Data and Information policy.

# Environmental Protection and Sustainability

UnitCargo not only complies with environmental regulations, but also strives to provide services as efficiently and environmentally friendly as possible with the necessary resources. UnitCargo is actively engaged in improving its environmental footprint and has a well established environmental system for more than 10 years.

Furthermore, to promote our ideas of sustainability, UnitCargo has been actively engaged through its initiating and founding of the "Forum Green Logistics", a platform for ideas and concepts on energy and efficiency as well as on environmental issues in the logistics industry in general and truck transport in particular, which was first held in 2015.

## Greenhouse Gas Emissions

At UnitCargo we are committed to minimizing our environmental impact and mitigating climate change through responsible management of greenhouse gas emissions. We set forth a steadfast commitment towards reducing emissions, promoting sustainability and fostering a culture of environmental responsibility among our employees, suppliers and business partners.

## Handling of Disposals

Our waste disposal practices aim to prioritize environmental sustainability and public health. We strictly adhere to all applicable laws and regulations governing waste management. We promote sorting and segregate waste material wherever possible, while fostering a culture of continuous improvement, regularly reviewing and updating our waste management processes to minimize our ecological footprint and promote a cleaner, healthier future.

## Vision

We believe in a fossil free logistics world.

We expect full support in this vision and to contribute to the further development and improvement of environmental friendliness of our services.

For more information, see UnitCargo's Sustainability policy.

## Concluding Remarks

This Code of Conduct is an integral part of any business relationship with UnitCargo and must be observed by business partners and their employees.

Non-compliance can have far-reaching consequences (possibly also under criminal law) and, in the event of serious or repeated infringements, lead to the termination of the business relationship by UnitCargo with immediate effect.

In the event of suspicion of non-compliance with the rules in this Code of Conduct, the UnitCargo Legal Department at [legal@unitcargo.at](mailto:legal@unitcargo.at) must be informed immediately and appropriate measures taken to remedy any violations that have occurred or to prevent further violations.

This Code of Conduct can be consulted at any time at [www.unitcargo.at](http://www.unitcargo.at).