

# CODE OF ETHICS



**LINK Sp. z o.o.**

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## Code of Ethics of LINK Sp. z o.o.

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## 1. General principles of Ethics

- 1.1 Waberer's International Pte. Co. (hereinafter: The Company), and its consolidated subsidiaries (hereinafter: „Subsidiary” or „Subsidiaries”, together „Companies” or „Group”, or every entity affected by this Code of Ethics, including LINK Sp.z o.o. – mentioned separately as LINK) in the course of achieving its business goals insists on the highest standard of fair business practice and business ethics, honouring and complying with effective laws and regulations. The purpose of this Code of Ethics is to set out the principles governing the conduct of all managers, employees, contracted colleagues and business partners in business relationships outside of the Group as well as in in-house working relationships and with other external stakeholders. The principles set out herein spell out for Group staff and external persons entering into a relationship with the Group the aims and approach of the Group, its relationship with society, its employees and business partners, and the ethical criteria and values that play a major role in the life of the Group.
- 1.2 This Code of Ethics was created in response to Waberer's International Pte. Co.'s internal requirement because the Group believes that its success in the long term and nurturing the Group's good reputation can only be achieved through fair business practice. Thus, this is expected of the Group's employees, and legal and natural persons who have a relationship with the Group irrespective of their geographical location, the post held in their organisation, the contract defining their relationship and the length of this relationship.
- 1.3 According to chapters 1.1 and 1.2, the scope of this Code of Ethics covers:
  - (a) the basic principles of behaviour expected in business relationships outside of the Group as well as in in-house working relationships and with external stakeholders as substantive scope;
  - (b) the managers, employees, contracted colleagues and business partners, as personal scope
  - (c) the complete operational area of the Group, including the headquarter, sites, branch offices, as well as the Group's or its employee's and its business partner's operational area in connection of the Group's operation, as geographical scope,
- 1.4 The Code of Ethics cannot provide guidance for every potential situation and topic, and in certain cases other company regulations will prevail. If the Code of Ethics or any part of it is contrary to any rule of law, the rule of law will -at least partly- govern.

1.5 Waberer's International Pte. Co.'s, as well as LINK Sp. z o.o.'s Code of Ethics is officially published by the Chief Executive Officer and General Managers. In the event of any infringement of the provisions of this Code of Ethics is perceived, all employees are entitled and obliged to notify the HR Director to have the matter examined. The Group guarantees the protection of all employees notifying such infringement in good faith and guarantees to examine the matter including all circumstances on merit.

## **2. Compliance with the law and contracts**

2.1 The Group has strict expectations of its directors, executive officers and employees regarding compliance with effective applicable national and international legislation and the commitments undertaken in valid contracts as well as with the highest standard of business ethics.

2.2 The Group's reputation for integrity and fairness is a priceless value. Infringing this principle would have serious consequences for the Group and the Group's employees. For this reason disciplinary proceedings – as well as measures according to chapters 21.5-21.7 of this Code of Ethics – will be launched against any employee who intentionally infringes this principle, or authorises or permits employees under them to do so.

## **3. Fair business practice**

3.1 The Group conducts its business activities paying attention to fairness and the environment. The Group abides by the standards applying to human and civil rights, and respects all persons it comes into contact within the course of business. In reaching its business decisions the Group will strive to achieve outstanding economic success while devoting attention to others and complying with ethical standards in full.

## **4. Relations with business partners**

4.1 The Group establishes reciprocally advantageous business relations with suppliers, subcontractors, clients and other business partners which are based on written documentation and contracts. The Group expects the principles governing the business of its partners to correspond to its own principles based on reciprocity.

4.2 For government orders and assignments particular attention is paid to compliance with the public procurement legislation at the highest level in addition to full compliance with unwritten ethical standards.

## **5. Relations with competitors**

- 5.1 The Group is committed to brisk but fair competition and abides by competition law.
- 5.2 The Group and its employees will not conduct negotiations or enter into agreements with competitors related to the sale and marketing of the Group's services.
- 5.3 The Group may form lawful and profitable trade alliances provided that the rules of competition law are not infringed in any manner and may not set targets in breach of competition or antitrust rules. The Group respects the antitrust rules.
- 5.4 In the course of its advertising, marketing and publicity activities, the Group will never criticise or voice opinions concerning the services of competitors.
- 5.5 The Group cannot condone the unfair solicitation of labour within the sector and expects the same of its competitors and business partners.

## **6. Expectations required of owners and investors**

- 6.1 The Group supplies all its owners and investors with regular, accurate and reliable information concerning the Group's business activities, financial position and performance. An essential requirement is the preparation of reports using information based on actual facts and complying with accounting standards.

## **7. Transparency of financial and accounting information and reports**

- 7.1 The Group undertakes a commitment to provide authentic, reliable information related to the Group's business activities to the owners, investors and business partners.
- 7.2 As part of this employees are expected to
  - (a) ensure that financial transactions are carried out appropriately and are fully accounted in order to avoid transactions and assets that cannot be represented in the financial and accounting system;
  - (b) cooperate with the Group's internal and external auditors, and provide the information and documentation required for them to conduct their audits;
  - (c) not make deceptive or misleading notes in their reports, statements or calculations of costs;
  - (d) never falsify any piece of information or data related to any financial statement nor may they request others to act in this manner.

## **8. Corporate property**

- 8.1 The Group endeavours to provide employees with all the resources that they require to carry out their duties to ensure effective and efficient performance of work and to create a safe and pleasant working environment. In this respect it is expected of employees that they accept responsibility for the Group's property; do not use assets and establishments owned by the Group for private purposes, and take due care of any portable equipment provided by the Group to enable them to work at home to protect them from unreasonable harm.

## **9. Corporate safety policy**

- 9.1 The Group as an ethical and trustworthy enterprise, believes that it is highly important to operate in accordance with regulations and act with the utmost circumspection in carrying out its activities also as regards safety considerations. The Group's safety policy is set out in a separate document the main principle of which regarding safety is reliability and prevention. The Group and its subsidiaries either directly or indirectly endeavour to promote their partners' activity through their corporate safety policy as well in the course of providing services. The aim of the Group is to protect its partners' valuables, assets and technologies, including intellectual property rights, know-how, business information and personal data, as well as other components of cooperation which its partners deem important. In order to achieve effective and safe cooperation with business partners, the Group requests and expects both partners and employees to respect its principles.
- 9.2 The Group is committed to maintaining and enforcing information security. Stored and generated data (files) represent the Group's asset, for which executives and co-workers are equally responsible. The Group is well prepared to protect its IT assets and existing data (files) from cyber-attacks.
- 9.3 Information security rules applicable to LINK are set in the *Information Security Regulation (ISR)*.

## **10. Auditing bodies and authorities**

- 10.1 The Group fully cooperates in a correct manner with the authorities and their representatives. During an official visit or inspection the staff engaged in the area concerned must provide detailed, accurate and true information to the authorised persons. No document issued to an auditing body, authority, state organ or government office may contain misleading information.

- 10.2 The Group will honour any potential boycotts and embargoes, export controls and economic sanctions announced by international organisations such as the United Nations, and performs such checks.
- 10.3 The Group will -if necessary- actively support the government and its agencies involved in drafting legislation and economic development.
- 10.4 During its operation, the Group develops and applies internal regulatory and control systems suitable for detecting problems within the Group or the organization of the Group, preventing misconducts and assisting in their correction. The whistleblowing system is public. Any internal or external stakeholder with a legitimate interest in remedying or terminating the conduct complained of can report by electronic means or by post in a protected manner.

## **11. Rules of conduct regarding society**

- 11.1 Besides achieving its business goals, the Group intends to be a social and community actor worthy of confidence that meets the expectations of its surroundings and society. The Group believes that by actively and responsibly participating in the life of society it can further society's success and prosperity.
- 11.2 The Group will support causes of public interest in its wider and immediate environment as far as its means allow, and bear in mind the protection and support of national and universal human values.
- 11.3 The Group supports neither political parties nor organisations which engage in political activity or party interests.
- 11.4 The Group is committed to social donations, sponsorship and charitable activity that is free of corruption and bribery.

## **12. Environmental protection**

- 12.1 The Group believes that environmental protection is a matter of exceptional importance. During its activities the Group operates a vehicle fleet with environment friendly engines, which is continuously modernised. Heightened attention is paid to legislation and other regulations protecting the human and natural environment and complying with these.
- 12.2 The corresponding Companies are operating Environmental Management System which is compliant with the EN ISO14001:2015 standard. In accordance with the provisions of this standard, the Group's environmental burden and energy consumption are constantly monitored and analysed, and care is taken to ensure that the impact of its activity on the environment is appropriate. Measures and

plans are drawn up each year, which are stated in annual reports, and implemented in order to reduce the impacts of corporate activity on the environment as well as the specific energy consumption. The Group does everything within its power to increase energy saving by internal regulations and using the most advanced technology.

- 12.3 Waste is to be collected separately, hazardous waste is continuously monitored and handled only by certified, licensed partners. Waste is not incinerated on site at corporate establishments nor does the Group operate a landfill.
- 12.4 Chemicals classified as hazardous that are indispensable to our operation must be used in accordance with relevant regulations. The valid Material Safety Data Sheets (*MSDS*) of all such chemicals are recorded.
- 12.5 The Group will do its utmost to minimise environmental pollution caused by potential unexpected events and accidents and, if need be, to remediate the area affected in accordance with regulations.

### **13. Business fairness**

- 13.1 The Group is committed to business activity that is free of corruption and bribery and condemns corruption in all forms irrespective of whether it is directly or indirectly connected with the activity of the Group or its business partners.
- 13.2 The Group and any of its employees do not accept and do not give either directly or indirectly gratuities, gifts, services, invitations, inducements or other unfair incentives to secure or keep business, market or financial advantage, as well as influence any official matter or procedure.
- 13.3 Any offer of this nature must be reported immediately to the superior manager.
- 13.4 Acceptance of a business gift is governed by the Group's Conflict of Interest Policy and Procurement Policy. Accordingly, employees of the Group may not accept any gifts, services or invitations from the suppliers and business partners of the Group with a market value exceeding EUR 100. Occasionally, small-value, representational gifts may be accepted and given. A business gift can never be accepted or given in the form of cash or an equivalent gift card.

### **14. Conflict of interest**

- 14.1 The Group expects employees to avoid personal activities and financial interests that conflict with commitments at work. The Group's employees may not seek advantage either for themselves or others from the improper exploitation of opportunities arising from their position.



## **15. Responsible communication**

- 15.1 The corporate communication of the Group (including external and internal communication activities; marketing, advertising and sponsorship activities; the organisation of events, and communication channels related to these activities such as social media, official company statements, interviews given representing the Group) is managed by the organisational units of the Group for this area.
- 15.2 Only designated persons may give official information, statements and interviews on behalf of or representing the Group. Company employees other than those designated are only permitted to make statements on any subject affecting the Group with the explicit approval of the responsible managers.
- 15.3 No employee except authorised persons may transmit or convey any information, news, document, image or sound material that threatens the good reputation of the Group either officially or unofficially to any area of the media, or behave in a way that harms the business interests of the Group or its partners.

## **16. Obligation of confidentiality**

- 16.1 Information concerning the Group, or its business partners must be treated confidentially as business secret. Employees and business partners are expected to act in a similar manner in this regard.
- 16.2 Employees and business partners of the Group are obliged to keep business secret and basic information concerning the Group or its operation. The protection of inside information is governed by a separate internal regulation, which must be observed by employees.
- 16.3 Employees and business partners of the Group are required to treat with confidence any basic information which they became aware during the occupation regarding employee's role or during their contractual work. Furthermore, they aren't allowed to publish any fact or data with unauthorized persons which can cause negative consequences for the Group or any other person.
- 16.4 From confidentiality of business secret's point of view, employment or contractual relationship is a fiduciary relationship, whereby in the employee or business partner gets possession of basic information regarding to the Group's operation, so the confidentiality of this information must be ensured not only during the period of employment or contractual relationship, but also after the termination that without any time limit.

- 16.5 Without prior approval of the Group, employees or business partners also aren't allowed to publish any fact, data or information, nor to make it available for a third person even if it isn't considered as business secret.
- 16.6 Retention of business secrets, basic information, their confidential treatment and protection are duties of the Group's employees.
- 16.7 Protection of information doesn't applied to the publicity of data of public interest and to the data reporting required by law, or to the obligation to provide information.

## **17. Obligations towards clients**

- 17.1 The basis of a sustained and successful business relationship is the commitment of all employees to the Group, and to the Group's clients and partners as well as their professional calling. The Group believes that the reciprocal confidence and fair business practice that has evolved with its clients and partners, and the provision of high-quality, professional service to them is its fundamental obligation. Similarly, establishing relations with employees based on reciprocal confidence and ethical standards is held to be the obligation of both parties. Consequently, the following is expected of the Group's employees and cooperating partners:
- (a) Duties are performed in accordance with the expectations of clients and partners, observing safety rules and to the best of their professional ability to ensure that the Group provides high quality services and contributes to developing these through considering the expectations and needs of clients.
  - (b) Genuine and professional information is given to clients and business partners, and information of a misleading nature is avoided.
  - (c) Communication to clients both verbal and written and the handling of customer relations in any form is polite and professional. Offensive behaviour, the use of foul language and conduct that falls short of the usual social standards of behaviour are expressly forbidden in communication.
  - (d) In the course of performing services client information is handled confidentially by employees in order to afford assets the best protection possible.
  - (e) No abuse of economic superiority should occur in the course of performing services.

## 18. The Group's expectations of its employees

18.1 The Group has the following expectations of employees and parties in a contractual relationship with the Group:

- (a) the requisite professional knowledge for the post held and the continual broadening of this, as well as up-to-date skills and competence for the job, participation in compulsory education and e-learning training
- (b) the consumption of alcohol, narcotics or other behaviour-modifying substances while working or at the workplace is forbidden for employees. Being in an appropriate state of physical and mental health for the performance of work and for driving a vehicle is expected of employees.
- (c) commitment to the goals and values set and published by the Group.
- (d) being of good appearance and well-mannered towards colleagues, business partners, persons from auditing bodies and authorities as well as any other external visitor to the Group.
- (e) active participation in activities and processes targeting company development, and an innovative approach.
- (f) loyalty to the Group. Not disclosing internal information, confidential data and business secrets; protecting the Group's property and assets, their sparing use for their intended purpose and preserving their condition.
- (g) treating business information confidentially and avoiding marketing that conflicts with the rules of ethics.
- (h) compliance with the safety regulation published by the IT Division and the protection of electronic documents; the exclusive use of properly licensed applications and devices installed by the IT Division; the personal use of personal passwords received for applications and systems and keeping them secret; following the IT data saving policy.
- (i) avoidance of conflicts of interest regardless of post held.
- (j) polite internal communication and behaviour.
- (k) carrying out duties without harassment and physical or psychological aggression of any kind (individual or collective).

## 19. Guarantees provided by the Group

19.1 The Group guarantees the following for employees and persons participating in the Group's activity through a contractual relationship:

- (a) to provide a healthy, safe, congenial and environmentally friendly workplace and working conditions with a good atmosphere at work.
- (b) to devise emoluments that provide an incentive, are competitive and comply with the law; to pay emoluments without delay according to a schedule made known in advance.
- (c) to respect the civil rights of employees (ex.: equal treatment, freedom of conscience, personal freedom, right to bodily integrity, right to health, safeguard of honour, dignity, the right to bear a name, a good reputation, the right to one's own picture and voice record, secrecy, personal data and other generally private information etc.)
- (d) to respect the employees' private and family life. The Group is paying attention to that employee are only monitored (i) in conjunction with their conduct regarding to employment, (ii) with methods and tools that aren't against human dignity, (iii) and employees are informed about technical devices applied in surveillance.
- (e) The number of overtime hours worked in connection with legal circumstances may not exceed 376 hours per employee per calendar year. The weekly working hours, including overtime, may not exceed the average of the 48 days of the accepted averaging period. The restriction referred to above does not apply to employees who manage the company on behalf of the Employer.
- (f) to provide options for and a certain level of support for professional and language training or further training in order to improve professional and language skills.
- (g) to supply protective devices, protective clothing and drinking water at work in accordance with the law and as necessary to perform the job; to comply with health and safety rules and provide accident insurance, occupational health-, fire- and safety trainings.
- (h) to respect and appreciate staff.

- (i) to support the personal integrity and integration of employees; to provide training on joining the Group.
- (j) to ensure equal employment opportunity:
  - (i) to forbid discrimination at work based on age, gender, marital status, race, religion, ethnic origin, sexual orientation, belonging to any minority, ethnic issues, political persuasion, disability, etc.
  - (ii) to recruit, employ, promote and reward employees only on the basis of having the requisite skills and abilities for the post.
  - (iii) for non-native-Polish speaking employees, LINK will provide information written in their native language during the recruitment and admission process,
  - (k) to observe ethical and legal rules for keeping records of employees, to protect their personal data and to comply with relevant regulations.
- (l) to ensure freedom of expression at work.
- (m) to prohibit child labour or any form of forced labour, prison labour, slavery and involuntary labour; The Group might have employees between the ages of 16 and 18 as part of practical training, in compliance with current legislation, in certain positions and only in the framework of cooperation agreements with educational institutions. The Group records the date of birth of its employees on the basis of their official personal documents, and takes immediate action to eliminate it child labour should occur, while taking the best interests of the child into account. to respect the dignity of the individual and the freedom of association of employees.
- (n) to accept and promote the activity of employee organisations and trade unions, furthermore, encourage the expression of employees' opinions through bodies representing and asserting their interests.
- (o) To ensure that employees:
  - (i) have the right to give notice observing the due period of notice without any detriment.

- (ii) are guaranteed the freedom to leave the working area after the end of working hours or their shift and are entitled to at least 1 non-working day per week.
- (iii) will not have their personal documents, valuables, remuneration or other reward withheld in order to be employed or to retain their job, and neither will any commission or charge be made in this respect. The Group, while respecting the employee's right of self-determination, will only provide an advance payment of wages or loan if such a request by an employee is deemed justified and reasonable and after prior consideration.
- (iv) will not be made to work in an environment which poses a serious - exceeding what is permitted by law and otherwise justified - risk to their health or safety.
- (p) supports work-life balance and recognizes the right of workers to rest, recreation and freedom when working in casual work schedule, home office or on tools that provide continuous access.

## **20. Suppliers, subcontractors and partners**

20.1 The Group ensures, and based on the principle of reciprocity expects the following of the Group's cooperating suppliers, partners and subcontractors:

- (a) Ethical, fair cooperation with equal rights based on the principles of this Code of Ethics.
- (b) Partners to send fair tenders containing true data based on which the Group will guarantee fair and transparent competition according to the Group's Procurement Policy
- (c) During the tendering procedure, of the tenders with identical economic indicators, the Group will favour those which have a similar approach to the Group in the area of environmental protection, energy efficiency and to the principles of this Code of Ethics.
- (d) The Group reserves the right to inspect its suppliers' and subcontractors' quality and environmental protection activities in the form of an audit by prior arrangement.
- (e) The Group will treat all information about the partner which features in the tender as confidential.

- (f) The Group cannot condone the unfair solicitation of labour within the sector and expects the same of its subcontractors and suppliers.
- (g) The Group implements fair cooperation based on a written document (contract) with all suppliers and subcontractors.
- (h) The Group expects loyalty from its partners as well as products and services set out in writing in compliance with deadlines and conditions stipulated by contract. The Group refuses to trade with counterfeit goods on the market and does not procure such products or parts. The Group acquires, uses and utilizes only and exclusively works for which it also receives a legally secured right of disposal or use, and always settles their consideration and legal fate in writing with the parties concerned, in full compliance with the copyright protection provisions. It expects the same from its business partners, who can only and exclusively supply works with a legally clear background to the Group.
- (i) The Group expects partners to accept and comply with the provisions of this Code of Ethics and therefore, it will make every effort to ensure that its partners make a contractual commitment to do so

## **21. Compliance with the Code of Ethics**

- 21.1 Every employee of the Group is expected to be familiar with this Code of Ethics. Managers taking the responsibility to ensure that every employee become familiar with and upholding principles that have been set out by this Code of Ethics.
- 21.2 Should any concern, question or remark arise with the principles of this document, employees are encouraged to turn to any member of the management.
- 21.3 Any statement regarding to the harassment of principles expressed in this Code of Ethics shall be made in accordance with chapter 1.5. and the whistleblowing system which is publicly available on the homepage of LINK's.
- 21.4 It is strictly forbidden, and the Group is trying to avoid the discrimination or sanctioning of anyone who's been made a statement about the harassment of principles set out by the Code of Ethics.

- 21.5 Violation of the principles that have been set out by this Code of Ethics can lead to impeachment – depending of the circumstances – according to employment contract, civil law or criminal law.
- 21.6 Employment law consequences – depending on every circumstance of the case – can be a warning, in the employment contract, employment law or in any collective agreement-listed proportionate disadvantageous legal consequence or termination of the employment.
- 21.7 Employees can be liable for damages if the infringement of principles results a damage for the Group.

## **22. Miscellaneous provisions**

- 22.1 The Code of Ethics enters into force on the day of its signature and shall remain in force until revoked.
- 22.2 By signing this Code of Ethics its previous version is considered as revoked.

Warsaw, 29.09.2023

**Marcin Kąkol**

Chief Executive Officer

LINK Sp. z o.o.