

## GEVARA CODE OF ETHICS

### What is Gevara's Code of Ethics intended for?

The Code of Ethics of Gevara helps to reveal the values of our Company in daily work environment.

The Code of Ethics – a set of values based on the internal arrangement of the Company, which states that everything we do at Gevara will and should be evaluated according to the highest standards of ethical business and behaviour. Our commitment to follow the highest standards helps us hire great people, provide high-quality transportation services as well as attract loyal clients and partners. The foundation of our success is the respect shown for our clients, partners and each other, therefore we must maintain it every day.

Therefore, we ask you to read and follow the Code of Ethics of Gevara, while always bearing in mind that every one of us has a personal responsibility to engage and encourage other employees of the Company to follow this Code of Conduct. If you have any questions or want to anonymously express your opinion or inform that one of your colleagues at work does not follow the principles of the Code of Conduct, please do not remain silent. We want and need to hear what you have to say. If you want to report inappropriate behaviour or to communicate anonymously, you can do so by clicking on this link:

### GEVARA, TALK OPENLY



### Who must follow our Code of Ethics?

The entire Gevara group must follow the Code of Ethics of Gevara. We expect all our employees and board members to become familiar with and follow the Code of Conduct. Failure to comply with Code of Ethics may result in disciplinary action, including the termination of employment.

### What to do in case of any questions about the Code of Ethics?

If you have any questions and concerns – please do not remain silent. You can contact us and ask questions anonymously through the “Gevara, talk openly” system or by simply writing us an email: [atvirai@gevara.lt](mailto:atvirai@gevara.lt). You can also contact the Head of the Communication Department or the Head of the Personnel Department, the contacts can be found on Gevara's Intranet.

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## Main Values and Principles of the Code of Ethics

Our clients value Gevara not only because of our high-quality transportation services, but also because of the fact that we follow the service and ethics norms. Adherence to the following principles will help us maintain the highest standards.

### 1. Reputation

Our reputation is the most valuable asset of our Company. We must constantly try to ensure the trust of our clients and the impeccable reputation. All communication and interactions with our clients shall be carried out in a way which helps build their trust and maintain a good reputation.

### 2. Feedback and Complaints

We always try to promptly respond to feedback and complaints from our clients, partners or suppliers, whether it is a good review, a complaint or a message about disappointing services or behaviour. We are grateful for all the feedback as it helps Gevara to improve.

### 3. Respect and Dignity

Gevara is firmly committed to an environment free of harassment, discrimination, misconduct, abuse and to responding promptly to any complaint about such behaviour. It is forbidden to speak with other employees, customers or partners while raising the tone of your voice, ignoring or otherwise humiliating them. For this purpose Gevara complies with the following obligations:

- Obligation: Gevara undertakes to ensure safe working conditions without any discrimination and harassment.
- Ensuring the performance of the obligation: Gevara investigates every complaint and feedback promptly and impartially; the investigated complaints are made public within the Company, while ensuring the anonymity of the individual. These actions are completed in order to demonstrate and ensure that any inappropriate behaviour at Gevara will not be tolerated and that the offenders will be punished (termination of employment; in case of violence and theft – reporting to the police).

### 4. Integrity

Gevara ensures that employees are treated with respect, integrity and compassion regardless of the individual's position within the Company.

### 5. Possibilities

The management of Gevara will do anything in order to create a favourable working environment where every employee has the opportunity to exploit their abilities and achieve their goals, which would also affect the growth of the Company. Gevara ensures that there are no possibilities of harassment, intimidation, partiality or discrimination.

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## 6. Harassment, Discrimination and Bullying

We strictly prohibit any discrimination or harassment based on race, colour, religion, nationality, ancestry, pregnancy, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition or sexual orientation.

Gevara does not tolerate any form of verbal, physical or visual discrimination, harassment or bullying. If you believe that someone at Gevara has experienced bullying, harassment or discrimination, we strongly recommend to immediately report such incident to your manager or the Company's management. In case managers become aware of such incident, they should immediately inform the HR and the Company's management. HR will promptly and thoroughly investigate all complaints and take the necessary actions.

## 7. Drugs and Alcohol

Our position on drug abuse is simple: it is incompatible with the health and safety of our employees, therefore, we prohibit the use of any drugs at work or coming to work under the influence. The use of alcohol is not prohibited in our offices, but the employees of Gevara must be responsible and never consume alcohol in such a way that it would disrupt their work and results, provoke inappropriate behaviour, harm the safety and dignity of others and raise doubts about the compliance with the norms of the Code of Ethics. The drivers of Gevara are forbidden to consume alcohol at work in accordance with all applicable laws and the requirements of the Code of Ethics of Gevara.

## 8. Safe and Healthy Work Environment

We undertake to ensure a safe, healthy and violence-free work environment. It is forbidden to behave in a way, which could pose a risk to the safety and health of the employees of Gevara or our visitors.

The employees of the Company are required to undergo regular health checks and they cannot come to work while being sick, having a fever or other, even minor, health disorder. We must all protect each other.

## 9. Conflicts of Interest

If you are in a situation where due to a competitive business environment you may intentionally or unintentionally seek or receive personal benefits, benefits for your friends or your family and you think that you may face a conflict of interest at Gevara, please be sure to inform the Company's management. We shall all avoid conflicts of interest and any circumstances related to it.

## 10. Gift Policy

Gevara accepts and gives gifts, but their value must not exceed EUR 15. Gifts, both received and given, shall not be given for the purpose of seeking benefit. A gift is a sign of appreciation or gratitude.

Receiving gifts, discounts, entertainment and other benefits on behalf of Gevara from a supplier or business partner can easily cause a conflict of interest, especially if the value of the received item is significant, therefore, Gevara prohibits keeping any received gifts for yourself. Gifts, even if they were

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received personally at the Company, shall be considered the property of all employees of the Company as the work at Gevara is valued as a team effort and not the merit of one person. Gifts shall be left for shared use if possible.

Moderate business relationships, dinners, entertainment with clients and occasional invitations to attend local sporting events and holiday parties with clients are not prohibited, if it helps to build a strong relationship between the Company and the client.

### **11. Confidential Information**

It is equally important not to disclose the confidential information of our clients, partners and Gevara itself. Be sure to protect the confidential information by taking all the necessary measures.

Please do not send company's documents and other information to your emails, electronic media, or store it elsewhere than on in OneDrive, where the Intranet of Gevara is. All employees must store their work related documents and other files on Gevara's Intranet, in their own folders, so that in the event of any computer failure, electronic hacking or work from home, all the necessary documents would be safe and accessible.

### **12. Competitors / Former Employers**

We respect our competitors and want to fairly compete with them. We do not need confidential information of our competitors, nor do we need or collect confidential information from the former employers of our employees.

### **13. Bribery**

Gevara complies with the legal acts which prohibit any bribery. Gevara never gives, nor accepts bribes as it is completely incompatible with our Company's ethics and policies. In case of any event involving giving or receiving a bribe as well as in case of corruption, we always inform the relevant State institutions.

### **14. Child Labour and Young Workers**

Prevention of child labour. Gevara follows all the requirements of the United Nations Convention on the Rights of the Child (1989) and firmly against any child labour. We do not tolerate child labour not only at Gevara, but also at the companies of our suppliers, clients or partners. In case any supplier or partner uses child labour, we inform the relevant State institutions and stop our business relations with such companies.

Young workers. Gevara supports the legal employment of young workers. We ensure that young workers are employed in accordance with all applicable laws and undertake to protect them from any participation or work, which may harm their health, safety or moral due to the circumstances or nature of the work. The employment of young workers shall be carried out in accordance with the legislation of the country of employment which determines the employment of persons under the age of 18 and their working conditions.

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## 15. Support of Non-Profit Organizations and Charity

Gevara supports various non-governmental organizations while focusing on the treatment of children with cancer. All funds intended for the support of such non-profit organizations are transferred on behalf of all Gevara's employees.

## 16. Taking Care of our Nature

Gevara cares about the nature and its future. We believe that sustainable solutions help to save our nature and its resources, therefore all employees of our Company must use office paper, stationery, napkins, food, electricity, water and other resources in moderation both inside and outside the office.

We understand that as a transport company Gevara burns a lot of fuel and emits a large amount of CO2 into the air, therefore our Company constantly updates its truck fleet and choose the trucks that are manufactured in accordance with EURO6 standards as well as emit less CO2 into the environment. What is more, the Company promotes different initiatives and measures to protect the nature.

## 17. Behavioural Requirements for the Employees of Gevara

The employees of Gevara are the experts of partial cargo transportation and slightly crazy transport punks, who have to follow these behavioural requirements:

- each employee must work in an honest and professional way, while carrying out the functions assigned to him/her.
- Every employee must be loyal to Gevara and represent Gevara's interests.
- All employees must be tolerant with each other regardless of their position.
- All employees must act without discriminating another employee (in respect of gender, race, religion, marital status, age, political views, nationality, disability, health, sexual orientation, etc.) both inside and outside the office. All our suppliers and partners must also follow these principles of conduct.
- The freedom and right of association and collective bargaining shall not be restricted in any form.
- Employees can dress and look how they want. We believe that employees, who feel free to be themselves, work best.
- Every employee must demonstrate through his work, creativity, ideas and efforts that he/she is a real transport punk, as the real transport punk is the one who will always go an extra mile in order to provide the best transport services to our clients.
- The title "transport punk" is not related to style or looks. It means that a person stands out because of his work ideas, ideology and creativity, which helps Gevara to achieve the highest results.

*This Code of Ethics will grow and improve together with Gevara.*

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