

# Code of Ethics

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One of the components that make up moral development is the ability to perceive/recognize the moral aspect of a specific situation. The ethical decision-making process begins with the potential decision-maker being aware of how a particular situation can affect another person.

SIA Kreiss Code of Ethics is an internal document of the company that defines the basic principles and norms of behavior of the company's employees for fair and responsible business operations.

This document contains the company's core values such as integrity, reliability, honesty, commitment, loyalty, respect and professionalism.

The purpose of the code is to create business practices that are based on basic ethical principles and help employees find answers to questions related to various ethical dilemmas.

The ethical principles and norms contained in the code are binding on employees in their attitude to work, in their mutual communication, as well as in their relations with state and non-state institutions and business partners. Code of Ethics also applies to the subsidiaries KAURI and RIDEO.



## **The Vision**

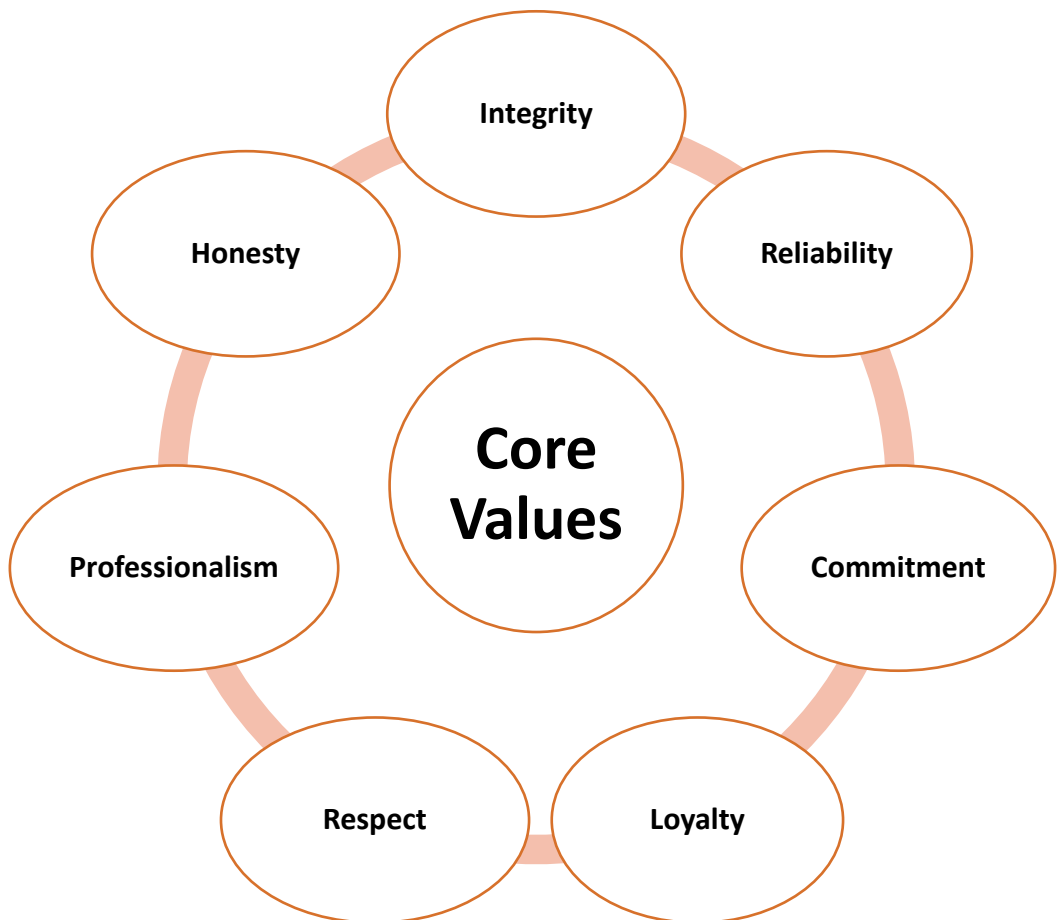
*To be one of the most recognizable logistics companies in Europe.*

## **The mission**

*To provide excellent, environmentally friendly logistics services, ensuring appropriate storage conditions for each cargo category during the entire transportation period.*

# Core Values

Customer – we offer tailor made transport solutions to simplify the lives of our customers exceeding their expectations. “Can do” attitude and “Win-win” solutions through collaboration and partnership. Operational Excellence – a passion for logistics applying continuous improvement principles, to access and improve our systems, processes and people by enhancing innovative approach in everything we do. We are committed to a long-term sustainable development. Integrity and Respect - is the compass which drives our behavior and attitude towards our stakeholders. We strive to achieve compliance, by conforming to regulatory requirements mandated by governmental institutions and industries we serve, conducting our operations ethically. Kreiss is trustworthy partner. With us you will get professionalism, commitment, safe deliveries, quality and reliability.



# Compliance with laws and regulations



For Kreiss is important to comply with all applicable laws, regulations, and industry standards, as well as the company's internal policies and procedures. We on regular base update list of all applicable laws and regulations and informing involved employees.

The company has developed, documented, implemented, and maintained a food safety management system in accordance with IFS Logistics, HACCP requirements and transport of medical goods and recommendations, GDP standard requirements, as well as binding regulatory acts. As well as implemented and maintained quality management system, environmental management system, work safety system in accordance with the requirements of Standards LVS EN ISO 9001:2015, LVS EN ISO 14001:2015., ISO 45001:2018



# Conflict of interest Anti-Bribery and Corruption POLICY



It is our policy to conduct all of business in honest and ethical manner. We take a zero-tolerance approach to Bribery and Corruption and committed to acting professionally, fairly and with integrity in our business.

## DEFINITIONS

**“Bribery” / “Corruption”**: Bribery occurs when one person offers, pays, seeks, or accepts a payment, gift, favor, or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory, or personal advantage. It can be direct or indirect through Third Parties.

**“Conflicts of interest”**: Occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another.

**“Employee”**: For the purposes of this policy this includes all individuals working at all levels.

## GIFTS

You are prohibited from accepting a gift or giving a gift to a third party in the following situations:

- a) it is made with the intention of influencing a third party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business, or a business advantage, or in explicit or implicit exchange for favors or benefits.
- b) it is given in your name and not in the name of the Company.
- c) it includes cash or a cash equivalent (such as gift certificates or vouchers).
- d) it is of inappropriate type and value and given at an inappropriate time (e.g., during a tender process).
- e) it is given secretly and not openly.

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# Conflict of interest Anti-Bribery and Corruption POLICY



## YOUR RESPONSIBILITIES

1. It is not acceptable for you (or someone on your behalf) to:
  - a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
  - b) give, promise to give, or offer, a payment, gift or hospitality to a Public Official or Third party to “facilitate” or expedite a routine procedure.
  - c) accept payment from a Third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them.
  - d) accept a gift or hospitality from a Third Party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by in return.
  - e) threaten or retaliate against another Employee who has refused to commit a bribery offence or who has raised concerns under this policy.
  - f) engage in any activity that might lead to a breach of this policy or perceived breach of this policy.
2. It is your responsibility to ensure that all accounts, invoices, and other documents and records relating to dealings with Third Parties, such as clients, suppliers, and business contacts, should be prepared and maintained with strict accuracy and completeness.



# KREISS WAY ON PREVENTING CHILDLABOUR



KREISS acknowledges the fact that child labor does exist in various countries.

However, KREISS does not accept child labor, and works actively against it. The complexity of the child labor problem requires a consistent, long-term effort to create broad-based and enduring developments to reach our goal; to ensure that no products/ service delivered to KREISS are manufactured by child labor. KREISS respects different cultures and values in countries where KREISS operates, however does not compromise on the basic requirements regarding the Rights of the Child.

“KREISS WAY ON PREVENTING CHILD LABOUR” is our code of conduct on child labor, has been established to make the KREISS position clear to suppliers and their co-workers, as well as any other parties. The requirements in this code of conduct are mandatory to all suppliers and their sub-contractors.

## **1. General Principle**

### **KREISS DOES NOT ACCEPT CHILD LABOUR**

“All actions concerning the child shall take full account of his or her best interests.”

“The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral or social development”.

According to this convention, the word “Child” is defined as any person below fifteen (15) years of age, unless local minimum working age is set at thirteen (13) years of age in accordance with exceptions for developing country

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## 2. Implementation

All actions to avoid child labor shall be implemented by taking child's best interests into account. KREISS requires that all suppliers and sub- suppliers comply with all relevant national and international laws, regulations and provisions applicable.

Suppliers and sub-suppliers are obliged to take the appropriate measures to ensure that no child labor is found.

Suppliers and sub- suppliers are obligated to take the appropriate measures to ensure that no child labor occurs at supplier's and their sub- contractor's facilities.

In case child labor would be found, KREISS responsible person must requires the suppliers and sub- suppliers to act in the best interests of the child. The suppliers and sub- suppliers must implement a corrective and preventive action plan, including education and training. The corrective action plan shall take the child's best interests into consideration, i.e., family, and social situation and level of education. Care shall be taken not merely to move child labor from one supplier's workplace to another, but to enable more viable and sustainable alternatives for the child's development. The supplier shall effectively communicate to all its subcontractors, as well as to its own co- workers, the content of "KREISS WAY ON PREVENTING CHILD LABOUR", and ensure that all measures required are implemented accordingly. KREISS makes unannounced visits to the suppliers and sub- suppliers. If corrective action is not made within an agreed timeframe, or if further violations occur, KREISS terminates all business with the supplier/ sub- supplier.

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### **3. Young Workers**

KREISS supports the legal employment of young workers. Young workers of legal working age have, until the age of 18, the right to be protected from any type of employment or work which, by its nature or the circumstances in which it is carried out, is likely to jeopardize their health, safety, or morals. KREISS therefore requires all its suppliers to ensure that young workers are treated according to the law; this includes measures to avoid hazardous jobs, night shifts and ensure minimum wages. Limits for working hours and overtime should be set with special consideration to the worker's young age.

### **4. Labor force register**

The supplier shall maintain documentation for every worker verifying the worker's date of birth. In countries where such official documents are not available, the supplier must use appropriate assessment methods as per local practice and law.

### **5. Monitoring**

KREISS has rights to make unannounced visits at any time to all facilities of suppliers and sub-suppliers. KREISS furthermore reserves the right to assign, at its sole discretion, an independent third party to conduct inspections to ensure compliance with "KREISS WAY ON PREVENTING CHILD LABOUR"

# DISCIPLINARY POLICY AND PROCEDURE



The purpose of the disciplinary policy and procedure is to set and maintain standards of conduct and to ensure that all employees are treated fairly and consistently. It is designed to help and encourage all employees to achieve and maintain satisfactory standards of conduct. For newly appointed employees who are in their probationary period, SIA KREISS retains the discretion to vary the procedure accordingly in respect of formal warnings, up to and including termination for a first breach of conduct rules. The disciplinary procedure is normally only used where other interventions have failed to produce the required improvement or when the conduct matter is sufficiently serious to require immediate formal action.

## SCOPE

This policy and procedure apply to all employees of SIA KREISS.

## PRINCIPLES

Where appropriate, informal action will be considered before recourse to the formal procedure. The procedure may be implemented at any stage if the employee's alleged misconduct warrants it. For formal action, the employee will be told of the nature of the complaint and an investigation will be undertaken before any decision to hold a disciplinary hearing. Employees may choose to be accompanied by a workplace colleague throughout the formal stages of the procedures. This procedure sets timescales to ensure that any disciplinary matter is dealt with quickly and efficiently. Before a disciplinary hearing, employees will be provided, if available, with written copies of evidence and relevant witness statements. An employee may appeal against any formal disciplinary action. All information will be retained on a confidential basis.

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SIA Kreiss has a vital interest in maintaining safe, healthful, and efficient working conditions for all of employees. Being under the influence of a drug or alcohol on the job poses serious safety and health risks, for all employees not only user. The possession, use, or sale of illegal drugs or alcohol on the job also poses unacceptable risks for safe, healthful, and efficient operations.

1. Anti-drug and alcohol policy and safety rules apply whenever an employee is on or in Kreiss property, surrounding grounds and parking lots, leased, or rented space.
2. The following rules are extremely important and an employee who violates any one of them will be subject to disciplinary action, up to and including termination.
3. Alcohol: an employee may not possess, use, transfer, offer or be under the influence of any intoxicating liquor. This rule prohibits using any alcohol prior to reporting to work, during breaks or meal periods, or in conjunction with any Company activity, except social or business events where a corporate officer has authorized the moderate consumption of Alcoholic Beverage.
4. No employee shall report for duty or remain on duty with the odor of alcoholic beverages about their person and while having an alcohol concentration of 0.01 or greater.
5. No employee shall refuse to submit to the following alcohol tests:
  - Reasonable suspicion.
  - return to duty.
  - follow- up testing as recommended by a substance abuse professional.
8. Any attempt to invalidate or tamper with the alcohol test will subject the employee to disciplinary action.
9. Drugs: an employee may not possess, use, transfer, offer, share, attempt to sell or obtain, manufacture, or be under the influence of any drug or similar substance and may not have any drugs of similar substances present in the body. This rule also pertains to Prescription drugs being taken without doctor authorization. It is Company's right, obligation, and intent to maintain a safe, healthful and efficient working environment for all of its employees and to protect company's property, equipment and operations from the risks associated with drug use in the workplace.

**EMPLOYEE RESPONSIBILITY** Employees are responsible for following all of SIA Kreiss work and safety rules, and for observing the standards of behavior and employer, colleagues and customers have the right to expect from you.

# Respect and diversity



- Employees treat people with different experiences with respect and recognize diversity as a company's potential.
- Employees respect and treat any colleague equally, regardless of their position in the company.
- Management ensures respect for the individuality of each person. No employee is discriminated against on the basis of race, ethnicity, religious beliefs, age, gender, sexual orientation, political beliefs, marital status, income level and disability, if any.
- Humiliation of colleagues, public criticism and cynical attitude are not allowed. Errors in the work process are pointed out personally.
- Evaluate a colleague's work, not his personality or opinions.
- Employees should avoid conflicts, but if they arise, resolve them through constructive cooperation. The employee respects everyone's right to his opinion, takes into account the opinions of others, without insulting or offending anyone personally.
- Employees should separate private life from work relationships and do not use work time to deal with private life problems, if any

Company's priority are:

- to ensure healthy and safe working conditions, in accordance with legislation and regulatory requirements in the field of occupational safety and protection.
- develop and implement measures to improve the working conditions of employees

SIA "Kreiss" has developed and implements an integrated management system, which includes the areas of labor protection and safety, fire protection, electrical safety, and environmental protection.

The company's management has defined tasks, assigned responsibility and authority, as well as delegated authority to promote effective occupational health and safety management (tasks, responsibility, authority and authority are documented in procedures, occupational safety instructions, job descriptions and explained to responsible employees). The subordination of employees is depicted in the organizational structure chart.

The company also ensures that people in the workplace take responsibility for the aspects of Health and Safety control, including strict compliance with the Health and Safety requirements applicable to the company.

SIA "KREISS" evaluates employee risks in the work environment to ensure the safest possible working environment conditions, reducing accidents. The company has developed internal work order rules, work safety and protection instructions for the workplace, as well as fire safety instructions. Every employee is obliged to observe and fulfill the rules, to take care of a safe working environment around them and to avoid accidents. To ensure constant attention of employees, the company conducts repeated briefings once a year to inform them about current events and remind about precautionary issues.

Health risk assessment is organized and integrated in all the processes. Health and safety is a top priority for us. System that was introduced allows us to accurately identify, describe and manage potential risks for our employees and act accordingly. The health and safety of all our employees and the employees of our subcontractors is of the highest concern for us. We are committed to provide safe and healthy workplaces on an international level. Our approach to reduce risk is systematic, evidence based, unfailingly observant and reasoned. With the support of our well-trained employees and subcontractors we manage risks proactively by implementing preventive measures to ensure safe operations. Reducing incidents and health issues are a top priority. Problems are regarded as opportunities to further minimize risks. Employees and subcontractors on all levels are obliged to act responsibly as occupational safety is affected by their behavior

## **PREVENTING ROAD ACCIDENTS**

Safety on the road is priority.

KREISS SIA is organizing workshops for practical driving skills and basic theoretical knowledge. All our drivers are known for economic and safe driving. Kreiss have established Driving Academy to help improve drivers' skills and guarantee safety of your cargo. Under our Health and Safety Policy all our drivers obliged to take the courses in our Driving School, such as driver awareness training, Speed Choice workshops and economic driving rules.

In the world of transport and logistics health and safety is a MUST.

KREISS aims to minimize any exposure to hazards that can occur related to the handling, storage and transportation of cargo. Aspects such as safe behavior, safe equipment and safely operating equipment are crucial factors regarding health and safety at work and form an important part of the company's culture.



We care about Environment, the World where we live and work in. Environmental aspects are evaluated/re-evaluated once a year together with the heads of the Department, and if necessary, they are involved in the management. They are reflected in the table Ecological aspects and risks, Environmental action plan.

Environmental aspects are the types of business activities and services that can interact with the environment. Determination of the significant environmental aspects is carried out on the basis of binding legislative norms, the scope of the aspect, the probability and the size of the impact and taking into account the opinion of the interested parties.

Drivers undergo Eco driving training.

SIA Kreiss monitors and collects key environmental data:

- Electricity
- Heat energy
- Water consumption
- Fuel consumption

CO2 emissions are calculated

As a result of the statistics, strategies are developed to reduce Co2 emissions and resource consumption.

# Forced labor, human trafficking and modern slavery

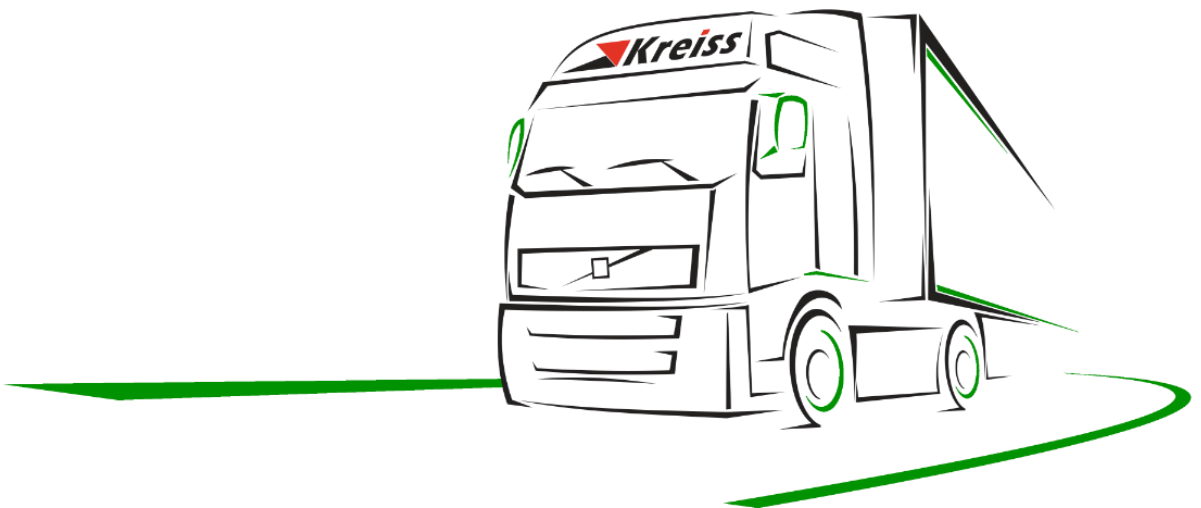


- SIA Kreiss all employees are on a voluntary basis and don't use any prison, slave, bonded, forced or indentured labor, or engage in any other forms of compulsory labor, or any other forms of slavery or human trafficking.
- SIA Kreiss is committed to the fight against human trafficking and forced labor.
- We don't confine or subject employees to restrictions on freedom of movement.
- SIA Kreiss uses only legitimate and reputable recruitment agencies, that are properly licensed to operate in accordance with applicable laws.



# Freedom of association

- We respect the legal rights of employees, as applicable, to join or to refrain from joining worker organizations of their choice, including trade unions, and to bargain collectively



# Implementation and enforcement

- It is a responsibility of every employee to perform their work tasks in accordance with the company's Code of Ethics, as well as other company regulations and developed guidelines.
- The reputation of the company is formed by all employees, because everyone has to make some decisions and every employee is identified with the company. Employees may find themselves in ethical contradictions, therefore the management of the company and the head of the structural unit monitor the application of the Code of Ethics in practice, periodically checking its suitability, adequacy and effectiveness at all levels of the company, improving it if necessary.
- Managers set an example for employees with their attitude and actions, and also answer employees' questions about ethical dilemmas, if they have arisen.
- In the company, everyone can report to the direct manager if someone observes violations of the rules.
- The reporter is guaranteed complete confidentiality.
- Employees can also ask a direct manager about the Code of Ethics at any time or suggest ways to improve it.

# Training and education



All employees of the company get training on the Code of Ethics.

The training takes place as follows:

The Code of Ethics is available in the A3 system and self-learning staff. As part of this training, employees can ask questions to who help solve ethical dilemmas. Also Inform about the "best practice" of the company, offer examples to truly understand and solve a similar situation on your own next time.

New employees must undergo an introductory training course with the head of the structural unit.

