

CODE OF CONDUCT

Ethical, responsible and lawful conduct across our transport and forwarding activities

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Assessment scope: Aurum Chemicals sp. z o.o., NIP 6342660122; registered office: ul. Kępowa 44, 40-583 Katowice, Poland.

Aurum Chemicals conducts business with integrity, respect for people, transport safety and environmental responsibility. The standards below apply to decisions made on behalf of the Company and to conduct in our business relationships.

1. Purpose and scope

This Code applies to all employees, drivers, managers, members of the management body, B2B contractors and other persons acting on behalf of Aurum Chemicals. Relevant requirements are also communicated to carriers, suppliers and business partners. Everyone in scope is expected to understand the Code, act in good faith and ask for guidance when uncertain.

Aurum Chemicals is an independent legal entity with no parent company. Services such as HR, accounting, administration and IT may be provided by a separate legal entity on market terms; accountability for compliance within Aurum Chemicals remains with its Management Board.

2. Compliance and business integrity

- Comply with applicable laws, contractual obligations and internal procedures in every country where work is performed.
- Do not offer, promise, give, request or accept bribes, facilitation payments, kickbacks or any improper advantage.
- Business gifts and hospitality must be modest, lawful, transparent and must never influence - or appear to influence - a decision.
- Disclose actual or potential conflicts of interest promptly and do not participate in the affected decision until guidance is received.
- Compete fairly. Do not exchange competitively sensitive information, coordinate prices or engage in market allocation or bid rigging.

- Maintain accurate operational and financial records. Fraud, falsification, concealment and misuse of Company assets are prohibited.
- Observe applicable economic sanctions, export controls, customs rules and restrictions on dealings with prohibited parties.

3. Human rights and fair working conditions

- Employment and engagement must be legal, voluntary and supported by understandable terms.
- Child labour, forced labour, human trafficking, debt bondage and the retention of identity documents are prohibited.
- Discrimination, harassment, bullying, violence and degrading treatment are not tolerated.
- Working time, driving time, rest periods, pay, and benefits must comply with applicable law and contractual commitments.
- Workers have the right to dignity, privacy, freedom of association and lawful collective representation.
- Recruitment, development and remuneration decisions must be based on legitimate and non-discriminatory criteria.

4. Health, safety and transport responsibility

- Follow occupational health and safety requirements, driver instructions, road safety rules and site-specific requirements.
- Use required personal protective equipment and report unsafe conditions, near misses, incidents and accidents immediately.
- Only qualified, authorised and fit-for-duty persons may perform regulated or safety-critical work.
- Vehicles, equipment and cargo securing must be checked and maintained in line with legal, manufacturer and customer requirements.
- Alcohol, illegal drugs and any conduct that may impair safe performance are prohibited during work.

5. Environmental responsibility

- Use fuel, energy, water and materials efficiently and avoid unnecessary emissions and waste.
- Support route optimisation, reduced idling, fuel-efficient driving, preventive maintenance and accurate fuel and kilometre records.
- Prevent spills and environmental damage; report any actual or potential environmental incident without delay.
- Apply environmental criteria when selecting and monitoring carriers and suppliers where relevant to the service.

6. Information, data and Company assets

- Protect confidential information, personal data, commercial know-how, customer information and intellectual property.
- Access data and systems only for authorised business purposes and apply the principle of minimum necessary access.
- Use Company assets responsibly and protect them from loss, theft, misuse, unauthorised disclosure and cyber threats.

7. Responsible business relationships

Carriers, suppliers and other business partners are selected using operational, legal, financial, safety and sustainability criteria proportionate to risk. They are expected to meet applicable requirements, provide reliable evidence when requested, address identified non-conformities and apply equivalent standards to authorised subcontractors.

8. Speaking up and non-retaliation

Suspected misconduct, unsafe practices or breaches of this Code should be reported promptly. Reports can be sent to office@aurumchemicals.eu, submitted in writing to ul. Kępowa 44, 40-583 Katowice, Poland marked 'Confidential - Whistleblowing', or raised directly with a manager or the Management Board. Reports may be made anonymously. Retaliation against a person who raises a concern in good faith is prohibited.

9. Implementation and review

- The Code is communicated during onboarding and through periodic awareness activities appropriate to the role.
- Managers are responsible for leading by example, answering questions and escalating concerns.
- Confirmed breaches may result in corrective action, disciplinary action or termination of cooperation, subject to applicable law and contract.
- Implementation evidence may include training records, acknowledgements, investigation records, corrective actions and supplier communications.
- The Code is reviewed at least annually and when significant legal, organisational or operational changes occur.

Approval record

This document becomes effective when approved. The signed approval record should be retained by the Company.

Approver
Grzegorz Szczepanik

Approval date: _____
Signature: _____

Signature Not Verified
Dokument podpisany przez
Grzegorz Szczepanik
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