

Approved by CEO of Transimeksa:

Darius Vyšniauskas

CODE OF ETHICS

This Code (hereinafter referred to as the Code) sets out the general obligations of UAB “Transimeksa” and Transimeksa Group of Companies (hereinafter referred to as “Transimeksa”) and the conduct-related requirements for its representatives, which the company follows in its activities.

The requirements stated in the Code apply to all employees of the Company and members of the Board under the control of the Company.

TERMS, CONCEPTS AND DEFINITIONS

Employee in this document shall cover the Employees hired by the companies themselves as well as temporary employees of companies, employees-pieceworkers, Employees working under contracts, including migrants, trainees and the Employees working in the trial period.

Supplier in this document shall mean any Vendor, Supplier or Service provider, supplying and / or handling the products, components, materials or services to / for “Transimeksa” Group of Companies.

Partner in this document shall describe the cooperation of “Transimeksa” and other transport company in the transport of goods or provision of other services necessary for the activity.

GENERAL PROVISIONS

In our activities, we undertake to follow all laws and other legislation, including, but not limited to: anti-corruption, export controls, social responsibility, human rights and freedoms and child rights protection requirements.

In our business we understand and respect privacy, material or intellectual property of our suppliers, contractors, business partners, state and municipal institutions and society.

We follow the requirements of the Code through the communication with each other as well as with our suppliers, contractors, business partners, state and municipal institutions and society.

In situations where the Code does not establish the appropriate standards of conduct, we act in such a way that our behavior would correspond to the society the highest reliability, integrity and transparency standards accepted in the society.

Working hours.

Transimeksa respects all national legislation acts regarding employee working hours. Clear working hours are set and overtime hours are respected and payed in accordance with national legislation acts of working labor. Rest times are respected and officially payed. Maternity leave and nursing breaks are provided equally for men and women. No more than 60 hours of weekly work are allowed.

Wages and benefits.

Wages and benefits and all national law legislation acts regarding the matter are respected.



Wages are paid a timely manner and cannot be lesser than minimum wage than officially declared national minimum. Wages are paid in appropriate official manner. No “under the table” payments are allowed. Clear and accurate paychecks are provided. If requested by our employees, advanced payments might be executed also.

All benefits that officially must be given to employees by law are payed and respected at Transimeksa.

RELATIONSHIPS WITH THIRD PARTIES

“Transimeksa” communicates with various interested parties: employees, potential employees, shareholders, customers, partners and state institutions.

We have undertaken to act ethically and responsibly. Responsibility is our key provision communicating with customers, partners, colleagues and employees.

Our business decisions and actions are based on the principles of the greatest benefit to “Transimeksa”, customers and shareholders.

To ensure the highest quality of freight services, we evaluate all possibilities and offer our customers only those solutions that meet their needs best.

We develop the culture of quality; continuously improve the freight services and management solutions. The main indicator of our success we consider the best feedback of customer our transportation services.

Main capital of “Transimeksa” is professional, attentive, responsible and dedicated employees. We raise high professional and ethical requirements for all working in the company; we value honesty, loyalty and initiative.

We care about the environment we live in, as well as what we will leave for the future. We seek to reduce the impact of the company on the environment. We constantly renew our trucks that meet the highest quality standards, and their technical specifications allow the reduction of environmental pollution.

We follow the highest professional and ethical standards accepted in the society. We guarantee the dignity and respectful behavior for everyone. We respect the right to privacy.

We are always ready to deal with emerging problems and issue by means of cooperation, but strictly require appropriate execution of commitments or duties as well as liability of responsible persons, if this is not done.

SOCIAL RESPONSIBILITY

The most important values that underpin our daily activities are responsibility, flexibility and agility, continuous improvement, attention to people and environmental sustainability. Principle of our activity is transparent and ethical business.

We dedicate our strengths and resources:

- a) To help the society where we operate in to grow. We support the social, health, educational and sports projects beneficial to our society.
- b) To assure the motivating conditions that stimulate the development for the people who work with us. We encourage creativity and initiative of our employees, invest in the improvement of professional competences and personal development of employees, we strive to create and maintain the balance of professional and personal life.

c) We introduce, implement and continuously improve proper environmental solutions that reduce material consumption and save resources. We periodically assess the impact of the company on the environment, plan and introduce the measure for the mitigation of impact on environment.

REQUIREMENTS OF CONDUCT

Main rules on professional and personal conduct of "Transimeksa":

- The employee must work conscientiously and professionally perform the assigned job functions.
- The employee must be loyal to "Transimeksa" and represent the interests of "Transimeksa".
- The employee must avoid any conflict of interests.
- All employees in "Transimeksa" should behave tolerantly with each other, regardless of their positions.
- Within the area of "Transimeksa" and outside "Transimeksa", every employee must act without discrimination in respect of other employee (sex, race, religion, marital status, age, political opinion, nationality, disability, health, sexual orientation and other cases). All of our Suppliers and Partners must also follow the principles of equal rights.
- The employees are not subject to any form of restriction of the rights and freedoms of associations and collective negotiation.
- "Transimeksa" is strongly against the harassment and the psychological as well as physical abuse.
- Each employee of "Transimeksa" is enabled to submit a complaint on discrimination, harassment, psychological and physical abuse, retaliation, material or intellectual theft, disrespect or mislead or misconduct of code of ethics.
- The complaint is received and administered by the Trust persons appointed by the Board of "Transimeksa". Anonymous complaints can be submitted when meeting with Trust persons or by e-mail: netylek@transimeksa.com.
- All complaints are registered, administered and investigated anonymously without any chance of disclosure.
- The employees shall save all material and intellectual property not only of "Transimeksa", but of their colleagues, our suppliers, contractors and business partners as well.
- Employees must also take all necessary steps to prevent illegal use, counterfeiting, damage or theft of the material or intellectual property.
- All employees of "Transimeksa" must pass regular examinations of their health.
- By their appearance, language and behavior, the Employees must set a good example herewith following the generally accepted rules of conduct.
- Influence of alcohol, drugs or other strong drinks at work are not tolerated.
- To ensure the safety of an employee, his colleagues and the society, each driver of "Transimeksa" is checked with breath tester before and after the freight.

Gifts and hospitality.

- We only accept the business gifts common in business practice. The employees must inform their line manager about the accepted gifts, except for low-value souvenirs (up to EUR 15). Accepted gifts are the possession of the Company and shall be kept in the space provided in the premises of the Company.
- We accept invitations to free events, entertainment and free meals only if there are substantial business reasons. Before accepting an invitation to such events, the representative of "Transimeksa" shall assess whether it is not aimed at making any illegal effect.
- Representatives of "Transimeksa" shall give only symbolic gifts to third parties intended for the improvement of "Transimeksa" image. "Transimeksa" is strongly against any gifts and giving or offering any payments if they are not intended or may be understood otherwise than improvement of "Transimeksa" image.



Support.

We do not sponsor any political parties, political organizations or politicians, and strive to ensure that the support is not used to finance any political parties or political campaigns and political campaigns as well as to refund any debt liabilities resulting from political campaigns of participants or related to political campaigns.

Information of "Transimeksa"

We ensure that all the information that we provide to each other and third parties is correct and corresponds to the facts. Representatives of "Transimeksa" must not provide, register or record any misleading or purposefully incomplete information.

We ensure that confidential information of "Transimeksa" as well as the information entrusted to "Transimeksa" is not disclosed to third parties. Confidential information shall be transferred to persons entitled to receive such information only to the extent necessary to fulfil their functions.

We disclose all the information, which must be disclosed pursuant to the legislation and other requirements applicable to "Transimeksa".

Environmentally-friendly and natural resource saving environment at the workplace

Each employee of "Transimeksa" shall take care of ecology and conservation of natural resources at the workplace as follows:

Shall sort the waste into special containers;

Shall put improper waste office paper into special cardboard boxes and shall hand over to the bureau administrator after filling them;

Shall save water and electricity in order to reduce energy consumption;

Shall promote and actively participate in environment protection initiatives.

BUSINESS ETHICS

The management of "Transimeksa" and contact persons of "Transimeksa" have been trained and are well aware of business ethics of "Transimeksa".

Reliability of documents.

All documents related to "Transimeksa" as well as records and reports shall be accurate, clear and reliable.

Corruption.

Corruption in this Code is understood as any activity misusing the power entrusted by "Transimeksa" for personal gain.

- We do not tolerate Corruption in any of its forms, and shall undertake to fight it.
- We strive that the anti-corruption policy requirements of this Code would be followed by all our suppliers, contractors, subcontractors, electricity producers, users, consultants, agents and other
- "Transimeksa" persons acting on behalf of "Transimeksa", beneficiaries as well as other business partners.



- We make every effort to ensure that the money paid to third parties such as agents, partners, vendors and consultants would not be used for corruption.

Bribery.

Bribe in this Code is understood as offering, giving, permission to give, request, acceptance or receipt of financial or other benefit in order to encourage wrong execution of functions or imposition of person's position. Bribe shall not necessarily mean the bribe in terms of money.

We do not directly or indirectly offer, give and allow giving, requesting, accepting or receiving a bribe, including through any third party.

Imposition.

We do not tolerate any imposition of the duties performed. Labor, financial, material resources, internal and confidential information provided by "Transimeksa" may be used only for the performance of direct duties, except for the cases where such use is expressly regulated by "Transimeksa" in writing.

We always inform the relevant State institutions in case of the fact of giving or taking a bribe, corruption and bribery.

Fair competition and anti-trust.

All anticompetitive agreements that competition laws prohibit are strongly discouraged.

Sharing any commercial and / or sensitive information between competitors unless approved by Transimeksa are not tolerated and will lead to contract termination and all legal consequences.

CHILDREN'S LABOUR AND YOUNG EMPLOYEES

Prevention of children's labor. "Transimeksa" follows all requirements of the Convention of the United Nations on the Rights of the Child (1989) and is strictly against any children's labor. We do not tolerate children's labor neither in "Transimeksa" nor in companies of suppliers, customer or partners. If we become aware of the fact that suppliers or partners use the children's labor, in all cases we inform the appropriate State institutions.

Young employees.

"Transimeksa" supports the legal employment of young Employees. We ensure that young Employees are employed in accordance with applicable laws, and shall protect them from any participation or work, which, according to the circumstances or nature of the work can harm their health, safety and morality. Employment of young Employees takes place only according to the legislation, regulating the employment of persons under 18 and their working conditions, of the country where the employment is performed.

Modern slavery.

Any exploitation of any human being against their own will are prohibited and strongly discouraged.

Forced labor of any kind and entrapment of other people are not tolerated.

Forms of modern slavery are taught to be recognized and reported immediately.

EXECUTION OF THE CODE



TRANSIMEKSA

The management of "Transimeksa" shall be responsible for the implementation of the Code and shall perform regular checks of its content and compliance.

The duty of each director is daily consolidation of the Code and supervision of its compliance. Each representative of Transimeksa" must work in accordance with this Code and is encouraged to inform of its potential violations.