



# CODE OF CONDUCT



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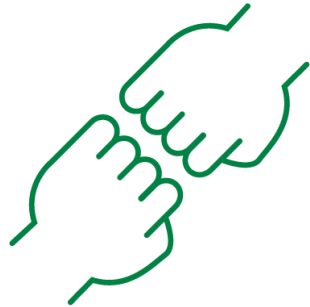
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At **EUTRACO**, we go "the extra mile" as a team for our business partners and as colleagues for each other. Passion is our strength and is felt from the first minute of our collaboration. You can find our soul in every project as our love for logistics knows no boundaries.

"Our goal? Together we strive for  
**#EveryMileASmile.**  
Every single day."

# Our Core Values



**RESPECT | SAFETY | PASSION**

# Message from our CEO



Dear Colleagues, Business Partners,

At EUTRACO we are defining the **logistics landscape of the future**. Whilst our roots go way back to 1967 we have successfully bridged an ESG-future-proof entrepreneurial spirit with compelling customer value add and true employee focussed strategies. We work hard every day to make our employees and business partners proud of being part our family. Equal hard works goes into building customer relationships that drive ambassadorship.

**Respect, Safety** and **Passion** – our core values – guide us daily in our decision making.

We have a regional footprint, and face a multitude of local contexts, business cultures, laws and regulations. However, our compliance principles remain constant and our **integrity shall never be compromised**. We have high expectations of ourselves, our employees and business partners, and will only cooperate with partners, suppliers and subcontractors who themselves adhere to equally high integrity standards.

This code of conduct sets out the principles which we deeply believe in – it is our continuous commitment across all divisions, countries and locations to applying ethically responsible business practices. We consider this document as **key governance** across the whole company. Our Board, Executive Committee, myself and the Entire Management Team apply a **zero tolerance** policy in regards to the Code of Conduct.

It is a joint responsibility to identify potential compliance and integrity concerns and to ensure these are reported via your management or through our whistleblower channel. Keep in mind that by timely addressing integrity matters, we have an opportunity to manage them and avoid them from become larger issues – and ultimately drive general improvement across our organisation.

Please join me in upholding the highest possible compliance and integrity standards – we count on your commitment.

Veroniek De Mulder  
CEO EUTRACO



# Our Commitment to Compliance and Integrity

## Why we have a Code

At **EUTRACO**, our actions are driven by our values as we work towards realizing our vision. Within **EUTRACO**, we are dedicated to conducting our business with the highest standards of integrity, professionalism, and customer focus. In alignment with these values, we have established a Code of Conduct.

This Code of Conduct serves as a guide, ensuring that we operate in an ethical, social, and environmentally responsible way. It provides a framework that aligns our actions with our core principles, promoting integrity, accountability, and sustainability throughout our organization and partnerships. By adhering to this Code, we demonstrate our commitment to maintaining high standards and fostering a positive impact on society and the environment.

This Code applies to all employees (including temporary personnel) and directors in **EUTRACO** and its corporate affiliates. It also applies to intermediaries, lobbyists, consultants and others who act on behalf of **EUTRACO**.

**EUTRACO** encourages its business partners to adhere to this Code of Conduct. Suppliers, subcontractors and other partners are expected to act according to standards which are consistent with applicable laws and **EUTRACO**'s Code of Conduct.

**EUTRACO** efforts to ensure such adherence.

Violation of this Code of Conduct or applicable laws may lead to internal disciplinary actions, dismissal and/or even criminal prosecution.

With "**Every Mile A Smile**", we strive to go the extra mile to create exceptional experiences for our customers while maintaining the highest ethical standards.



# Our Commitment to Compliance and Integrity

## We ensure **Compliance** with Laws and Binding Standards

The purpose of this Code of Conduct, is to ensure compliance with all applicable local, national, and international laws, regulations, and binding industry standards. This includes, but is not limited to, tax laws, anti-money laundering laws, privacy laws, labour and social laws, health and safety standards, environmental regulations and laws, anti-corruption and having all legally required permits and insurances.

## About our **Ethical** Business Practices

With "**Every Mile A Smile**" we strive to go the extra mile to create exceptional experiences for our customers while maintaining the highest ethical standards.

We expect all involved parties to conduct business with the utmost integrity and adhere to these ethical standards. It is crucial to refrain from any involvement in corruption or bribery, which includes the offering, soliciting, or accepting of improper payments, gifts, or favours in order to influence business decisions, gain unfair advantages, or obtain preferential treatment. We highly encourage fair competition and transparency in all business transactions.

Engaging in activities that compromise objectivity or loyalty to the organization is strictly prohibited. Additionally, we have a zero-tolerance policy towards tax evasion and are fully committed to preventing the facilitation of criminal activities related to tax evasion. Our commitment to these principles ensures that we maintain a trustworthy and responsible business environment.



# Our Responsibilities

## As Employees

- ✓ **Familiarize yourself** with the Code of Conduct. Read and comply with it, as well as any other applicable policies related to your role.
- ✓ **First think, then act:** make good choices, remain honest and do what is right. If someone asks you to break the Code, refrain from doing it. Report the problem right away using the available resources.
- ✓ **Comply with all relevant laws:** understand the legal requirements that relate to your job and our organization. If you are ever unsure about a law or regulation, contact our legal department.
- ✓ **Look for help when needed:** if things are unclear, look for assistance before going forward

- ✓ **Be alert** to anything that violates our Code, policies or law.
- ✓ **Report any concerns:** never overlook a violation. Protect our company and our reputation by reporting any problems immediately.





# Our Responsibilities

## As Board of Directors

**EUTRACO's** Code of Conduct is the foundation of our commitment to ethical and legal requirements and is reviewed annually by our Board Of Directors. They ensure that all employees are aware of and adhere to **EUTRACO's** Code of Conduct. Additionally, the Board ensures that annual training is provided, during which employees are required to acknowledge that they have read and understood **EUTRACO's** Code of Conduct.

## As Executive Committee

Our Executive Committee consists of experienced professionals with deep knowledge in the respective field. Within the framework of our Code of Conduct, the Executive Committee serves as the control mechanism, ensuring alignment with the principles promoted by the Board.

## As Manager

Our Managers are required to communicate effectively and enforce the Code of Conduct to their direct reports and act as role models. Managers are also responsible for promoting and monitoring compliance with the **EUTRACO's** Code of Conduct within their area of responsibility.



# Our Declaration of Compliance

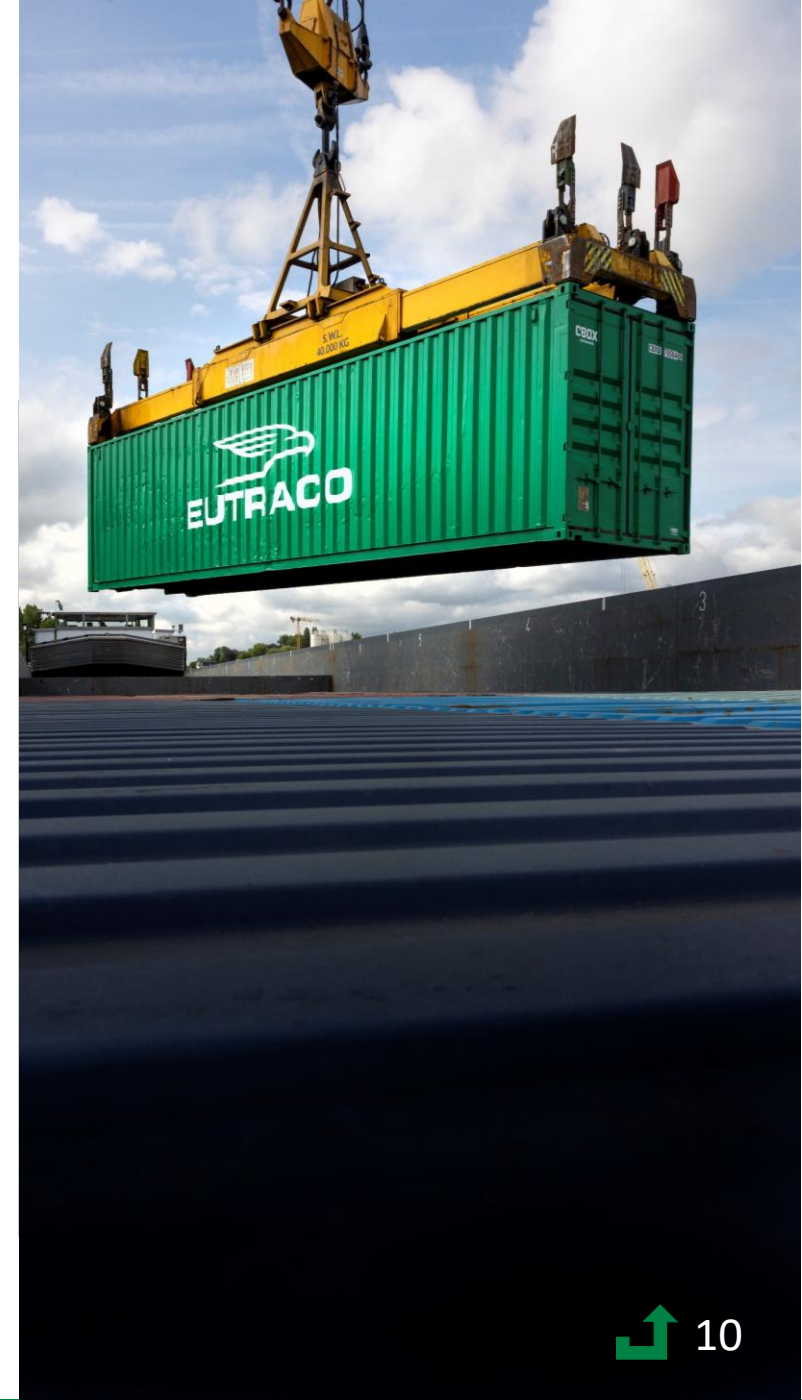
As an employee (including temporary personnel) and/or Director at **EUTRACO**, you will be requested to sign the annual statement of compliance in which you confirm that you have read and familiarized with this Code of Conduct and that you have conducted your tasks and responsibilities in accordance with the requirements within our Code of Conduct.

As a supplier, subcontractor, representative, or any other contracting partner, it is expected that you maintain compliance with ethical standards that align with **EUTRACO's** Code of Conduct. Additionally, you will be required to sign a declaration affirming your commitment to compliance.

## Right to Audit

We reserve the right to perform audits or inspections of and at the facilities, operations, and records to ensure compliance with our Code of Conduct. It is expected that you fully cooperate during such audits and grant access to pertinent documents, records, and personnel.

By adhering to our Code of Conduct, we aim to foster responsible and sustainable practices throughout **EUTRACO**. Additionally, we strive to foster a culture of integrity, respect, and ethical behaviour within the industry in which **EUTRACO** operates.





# Our Commitment:



**RESPECT | SAFETY | PASSION**

## We Respect Human Rights

In our Code of Conduct, we are committed to maintain the highest standards of human rights and labor rights in accordance with national and international legislation. We recognize the inherent dignity and worth of every individual, and we strive to ensure that our actions and operations uphold and protect any fundamental human right. This commitment extends to all individuals we engage with, including employees, subcontracted workers, and those affected by our activities. By respecting human rights, we aim to foster a culture of equality, fairness, and engagement within our organization and beyond.

# We Respect Human Rights

## No Child Labour

At **EUTRACO**, we enforce a zero-tolerance policy towards child labour. We firmly believe in the importance of protecting the rights and well-being of children. We want to ensure that no form of child labor is applied or supported within our activities or supply chains.

- 1. Employment Practices:** We strictly adhere to all applicable local and international laws and regulations regarding the minimum working age. We do not employ or engage individuals for work that exploits or involves children below the legal minimum age.
- 2. Supply Chain Due Diligence:** We conduct thorough research and monitoring to identify and address any potential risks of child labor within our supply chains. We collaborate with our business partners to ensure they share our commitment to fighting against child labour.

- 3. Reporting and Remediation:** We encourage all employees to report any suspected acts of child labour promptly. We investigate such reports diligently and take appropriate actions to address any violations and prevent future occurrences.

By incorporating these measures into our Code of Conduct, we demonstrate our dedication to upholding the rights of children and combatting child labour. We strive to create a responsible and sustainable business environment that prioritizes the well-being and development of young individuals.





# We Respect Human Rights

## No Forced Labour and Human Trafficking

At **EUTRACO**, we firmly oppose any acts of forced or compulsory labour. We insist that all work be voluntary, and we have zero tolerance for practices such as bonded labour, indentured labour, military labour, modern slavery, and any form of human trafficking. Every individual has the freedom to leave work or terminate employment at any time.

## Non-Discrimination

We promote an inclusive work environment that values the diversity of our employees. We are committed to equal opportunity and reject any forms of discrimination or harassment based on gender, ethnic origin, nationality, social origin, religion, age, disability, sexual orientation and identity or any other characteristics protected by applicable law. The basis for employee selection and promotion at **EUTRACO** are qualification, performance, skills and experience.





# We Respect Human Rights

## Freedom of association and speech

We respect our employees' right to join or not to join a trade union or employee representation of their choice, free from threat or intimidation. We recognize and respect the right to collective bargaining in accordance with applicable local law.

Employees who act as representatives are neither disadvantaged nor favoured in any way.

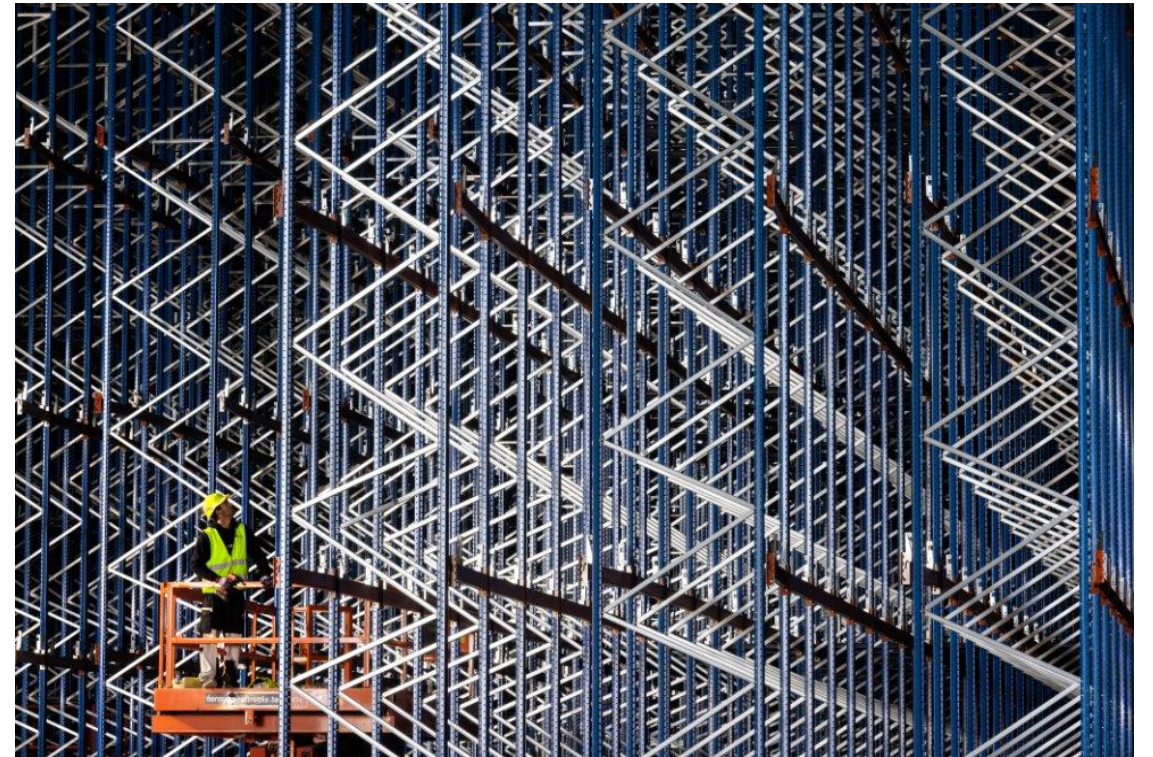
In our organization, we encourage open communication, the sharing of ideas, and the expression of concerns without fear of discrimination, reprisal, intimidation, or harassment. We believe that fostering an environment of open dialogue and inclusivity allows for the free exchange of thoughts and opinions, contributing to a more vibrant and innovative workplace.



# We Respect Human Rights

## Working conditions

We compensate our employees in accordance with local industry, labour market and minimum wage law and the terms of any applicable collective agreements. We prioritize timely payment of our employees and provide clear communication on how they are being paid. Our commitment to compliance extends to all relevant local laws regarding working hours, regulations regarding overtime, breaks and vacation. We have the commitment to ensure that our employees receive all the necessary and legally mandated compensations and benefits.







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At **EUTRACO**, we build transparent relationships, ensuring fair competition and honest interactions with our business partners, suppliers, and other third parties. We prioritize fair competition and ethical conduct.

# What about our Business Ethics

## How we deal with Gifts, Benefits and Entertainment

In **EUTRACO**, we aspire for everyone to adhere to ethical behavioural standards when receiving gifts, entertainment, and other benefits from clients, suppliers, partners, or other business relationships. Upholding the trust of our customers and business partners is of paramount importance. **EUTRACO** enforces a stringent policy regarding the acceptance and offering of gifts. These rules are incorporated within the Employee Regulations as well as the corporate governance framework.

This means that cash or cash equivalents may never be accepted as a gift from clients, suppliers, partners or other business relationships. A zero-tolerance policy applies to all forms of currency or cash equivalents, regardless of the amount.

Offers of this nature must be politely, but firmly, declined or immediately returned to the sender if delivered without prior notice and to be reported to your manager.

This also applies to any situation that could affect, or appear to affect, the professional judgment in the performance of the respective work or duties for the company or a third party.

However, we recognise that the acceptance of small advertising or promotional items, with no commercial value as well as modest hospitality and events may be a legitimate contribution to building good business relationship. If you are in doubt, always ask your manager.

Any exceptions require prior written approval.



# What about our Business Ethics



At **EUTRACO**, we are committed to conducting our business according to the highest standards of integrity and ethics. We prohibit any form of bribery, corruption, or improper influence in all our operations. Our Code of Conduct outlines the following key principles:

## We do not tolerate **Bribery**

1. **Prohibition of Bribery:** We clearly prohibit the offering, requesting, or acceptance of bribes or any illegal payments or gifts which can lead to an unfair advantage or influence business decisions.
2. **Compliance with Laws:** We adhere to all applicable local and international laws, regulations, and anti-corruption legislation. We expect our employees and directors to understand and comply with these laws, as well as any internal policies and procedures designed to prevent bribery and corruption.
3. **Transparent and Fair Business Practices:** We promote transparency, fairness, and healthy competition in all our dealings. Our business transactions and relationships are conducted based on merit, quality, and lawful considerations, free from any improper practices.
4. **Due Diligence:** We exercise due diligence in our selection and engagement with business partners, suppliers, and agents. We seek to work with individuals and organizations who share our commitment to ethical conduct and are not involved in any corrupt activities.



# What about our Business Ethics

5. **Reporting and Whistleblowing:** We encourage all employees to report any suspected or observed incidents of bribery or corruption promptly and without fear of retaliation. We have established confidential channels for reporting such concerns, and we investigate all reports thoroughly and take appropriate actions.
6. **Training and Awareness:** We provide regular training and awareness programs to educate employees about the risks and consequences of bribery and corruption. We empower them to make ethical decisions and act as vigilant guardians of our company's reputation.

By upholding these principles in our Code of Conduct, we strive to foster a culture of integrity, transparency, and trust. We are committed to preventing bribery and corruption, both within our organization and in collaboration with our stakeholders, to maintain the highest ethical standards in all our business activities.

## We avoid Conflicts of Interest

Conflicts of interest exist when positions within **EUTRACO** are used for personal gain beyond the normal compensatory rewards of employment. Conflicts of interest also exist when business connections are maintained with competitors, customers, suppliers, subcontractors and other contracting parties beyond the regular business relationship. Conflicts of interest may also arise when an employee's personal interest takes precedence over **EUTRACO's** while that member is acting within her or his capacity as an **EUTRACO** employee. Any appearance of conflict of interest could damage the reputation of **EUTRACO** or its employee.

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## No room for Insider Trading

No information of a confidential nature concerning **EUTRACO's** activities may be used, communicated or revealed without the authorisation of the **Executive Committee**. Furthermore, individuals having access to non-public information regarding a company listed on a stock exchange must refrain from using this information to trade on financial instruments from which they could derive a profit.

# What about our Business Ethics

## We prevent Money Laundering

Money laundering supports criminal activity including drug trafficking, terrorism, corruption and tax evasion. Money laundering is disguising the proceeds of crime in order to hide its illegal origins or otherwise dealing with the proceeds of crime. Criminal proceeds include not only money but all forms of, assets, real estate and intangible property that are derived from criminal activity.

**EUTRACO** is committed to complying with all anti-money laundering and anti-terrorism laws. We will conduct business only with reputable customers and business partners involved in legitimate business activities, with funds derived from legitimate resources.

**EUTRACO** evaluates the business and background of its prospective business partners to determine the origin and destination of funds and assets.

We expect all parties to be attentive and not attempt to receive or make payments in cash or engaging transactions involving unusual banking payment arrangement; We also expect them to report any suspicious transactions or incidents of money laundering.

## Partner Relationships

We encourage all our business partners to maintain an open and transparent communication with **EUTRACO**. Our business partners are encouraged to promptly report any issues or concerns related to work, including but not limited to delays, quality and safety concerns, potential risks and non-compliance with any of the principles described in our Code of Conduct. Collaboration and cooperation are key to building successful partnerships.

Any violation of this Code of Conduct should be reported to **EUTRACO** ([suppliers@eutraco.eu](mailto:suppliers@eutraco.eu)). In cases where violations can be rectified, **EUTRACO** will work together with you to address them, and this may involve conducting an audit. However, if satisfactory remedies for non-compliance cannot be found, we retain the right to terminate our business relationship.

# We care for our People & Assets

## Health and safety

Safe operations are of utmost importance to **EUTRACO**. We frequently undertake work in challenging conditions, necessitating a high level of diligence to ensure the safety of our employees, customers, (sub)contractors, consultants, and other stakeholders. We firmly believe that all incidents can and should be prevented, and our goal is to achieve zero harm to people, assets, and the environment. Our commitment extends to providing a secure work environment for our employees, contractors, and visitors.

**EUTRACO** adheres to the Voluntary Principles on Security and Human Rights, which serve as a framework to ensure that we operate within a framework and by standards that encourages respect for human rights.

### Your Responsibility

- ☐ Safety and security are everyone's responsibility. You must understand and act on your responsibilities to contribute to a healthy, safe and secure work environment
- ☐ Stop work immediately if you consider it unsafe. Report any incident or unsafe condition as soon as possible. If you see something, say something

- ☐ Know the relevant emergency procedures for your work

## Drugs and Alcohol

**EUTRACO** is a drug and alcohol-free workplace. We will not tolerate anyone being under the influence of drugs or alcohol while at work for **EUTRACO**. Limited amounts of alcohol may, however, be consumed when local custom and occasion make it appropriate, and provided the consumption is not combined with operating machinery, driving or any other incompatible activity. Tests for drugs and alcohol may be conducted whenever deemed necessary and in accordance with applicable laws.

### Your Responsibility

- ☐ Never work under the influence of drugs or alcohol
- ☐ Be conscious about work-related events where alcohol is served and show moderation

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At **EUTRACO**, we encourage our employees to understand and minimize the environmental impact in their area of work, to share best practices and participate actively in environmental programs.



# We care for our People & Assets

## Environmental responsibility

**EUTRACO** strives to minimize its environmental impact and promote sustainability in its operations. This includes compliance with environmental laws and regulations, proper waste management, energy conservation, and the adoption of environmentally friendly practices whenever feasible, such as:

**Environmental permits and reporting:** **EUTRACO** is in possession of all environmental permits, approvals and required registrations according to industry standards.

**Pollution prevention and efficient resource management:** **EUTRACO:** **EUTRACO** is committed to continuously optimizing resource consumption and implementing measures to prevent pollution and minimize waste.

**Use of dangerous substances:** If **EUTRACO** works with hazardous products, such as chemicals, that could pose risks to human life and the environment, every possible effort

must be made to guarantee the safe handling, transportation, storage, usage, and disposal of such products. Proper labelling of the products should be ensured to promote safety.

**Continuous assessment of energy consumption, and greenhouse gas emissions:**

**EUTRACO** is dedicated to identifying, monitoring, and minimizing greenhouse gas (GHG) emissions and energy consumption related to its operations.

**EUTRACO** is committed to actively seeking cost-effective methods to enhance energy efficiency and reduce both energy consumption and greenhouse gas emissions.





# We care for our People & Assets

## Food safety and quality

**EUTRACO** maintains high standards of food safety and food quality assurance. All warehouses that store food products have the necessary internationally recognised quality certificates to meet the highest food safety standards. Periodic internal and external audits are carried out to monitor food and safety quality at all times. Employees are regularly trained to stay in line with all legal requirements around food safety.





# We care for our People & Assets

## Data Privacy and Confidentiality

**EUTRACO** protects the interests of employees, customers, business partners and other stakeholders by assuring information is trusted, secured, respected and protected from unauthorized access, loss or disclosure and use it for the intended purposes.

### Personal Data

To comply with data privacy legislation, **EUTRACO** has issued binding corporate rules ensuring that collected personal data is not corrupted, copied, stolen, disclosed, misused or accessible to persons without adequate authorisation and approval.

- ☐ Personal data is any information related to an individual person that can be used to identify the person, directly or indirectly (name, photo, email address, bank details, employment information, a computer IP address, etc.)
- ☐ Special categories of personal data is any personal data revealing racial or ethnic origin, health or medical, political opinions, religious beliefs, etc.

# We care for our People & Assets

Employees must only store personal data (including special categories of personal data) in Outlook, OneDrive, and other personal drives for a short period of time until further processed and personal data should only be shared if they have a legitimate reason to do so. Deletion of data must follow internal applicable procedures.

All personal data (including special categories of personal data) to be stored in a central system, e.g. HR systems, etc., must be forwarded or uploaded to the relevant system. When data is uploaded, the e-mail and/or data must be deleted from the personal files and Outlook.

Questions about the handling of personal data (including special categories of personal data) should be directed to the Legal department. ([legal@eutraco.eu](mailto:legal@eutraco.eu))

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## Handling of Company Property

The use of company property, including labour, supplies, equipment, buildings or other assets, for personal benefit is prohibited where not explicitly allowed by agreement. Each employee has a responsibility to safeguard and make proper use of **EUTRACO**'s property

Intellectual property is a valuable asset that must be safeguarded against unauthorized use or disclosure. Such property includes trade secrets, confidential information, copyrights, trademarks, logos, as well as customer lists, business opportunities and product specifications, whether owned by **EUTRACO**, affiliated companies or business partners.



# We care for our People & Assets

## Business Secrecy

Our employees shall not disclose information that is not known to the general public for personal gain or the benefit of anyone other than the company.

Such information may be financial information, business plans, supplier classification, **EUTRACO** know-hows, technical information, benchmarks on value chain, information about employees and/or customers, and other types of sensitive knowledge.

In relations with our customers, suppliers and business partners, we come across confidential information and knowledge about their businesses. Everyone working within **EUTRACO** who has access to such assets or confidential information must act in accordance with the employment contract, the contract with the applicable customer, supplier or business partner, relevant laws as well as the policies and rules within **EUTRACO**.





# We care for our People & Assets



## Business Continuity

In the event of unforeseeable or unpredictable events, such as systemic failures or catastrophes, business continuity and disaster recovery plans are in place to mitigate potential disruptions or adverse effects on operations. These plans encompass procedures to ensure the safety of employees, protection of assets, and support for partners, aiming to minimize interruptions and other negative impacts on our business.



# #EveryMileASmile

## Continuous Improvement

We strive for continuous improvement in our operations, aiming for excellence in quality, efficiency, and customer service. We are encouraged to actively seek feedback within the company to identify areas of improvement and implement appropriate corrective actions.

# How to report concerns

## Need help about the code of conduct?

If assistance is needed or you have questions or concerns about the **EUTRACO** Code of Conduct, you should consult your manager or legal department.

### Contact details:

✉ [legal@eutraco.eu](mailto:legal@eutraco.eu)

## How to share Concerns?

All parties are encouraged to speak up when they know of or suspect any irregularities or improper actions that have been committed or are likely to be committed. Employees are also urged to report any concern of suspected breaches of the principles and rules outlined in this Code of Conduct or applicable laws and regulations.

All parties should use any channels they feel comfortable using when raising concerns, whether through the management, HR, Head of Legal or the **EUTRACO** Whistleblower Channel.

The whistleblowing Channel is open for all employees and non-employees to notify of a concern of misconduct.

The whistleblowing Channel supplements “traditional” modes of reporting, such as the hierarchical channel. Accessible via Internet at [Eutraco.eu](https://eutraco.eu), it enables you to report a (potential) breach of the Code of Conduct of which you are personally aware. **EUTRACO** ensures a confidential processing of alerts and the protection of whistleblowers acting in good faith against any form of retaliation. However, individuals who make improper use of the system may face disciplinary action notwithstanding legal proceedings.

More details and guidance are further set out in our internal Whistleblowing Policy.

Do not ignore a violation. Prevent harm to **EUTRACO** and its reputation by reporting your concerns immediately.

