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APPROVED  
by the Board of Directors  
of the Company on 30 April 2020

  
Chairman of the Board of Directors

## GLOBALTRANS INVESTMENT PLC

### Supplier Code of Conduct

## **OVERVIEW**

Globaltrans Investment Plc (herein after “Globaltrans” and together with its subsidiaries – the “Group”) is committed to the highest standards of business ethics and sustainability. The Group operates with integrity towards its suppliers and treats them professionally, fairly and equally. In turn, we expect our suppliers, defined as all companies who wish to establish and maintain business relations with the Group, to adhere to the same social, environmental and ethical responsibilities as we do.

From the outset, the Group has implemented internal procedures and policies which regulate relations with suppliers in accordance with applicable laws. At the same time, the Group recognises that this is a minimum requirement and seeks to ensure supplier relations are conducted with dignity and equality and to expect the same from these companies in their relations with their stakeholders. In order to formalise our long-term commitment to this objective, we have developed this Supplier Code of Conduct (the “Code”), which is based on the UN Global Compact’s principles and outlines the Group’s expectations for supplier conduct regarding labour and human rights, health and safety, environmental protection and ethics.

These guidelines set the minimum standards of business conduct we expect from all of our suppliers.

## **RESPONSIBILITIES**

### **Basic Human Rights**

All employees deserve a fair and ethical workplace. People must be treated with the utmost dignity and respect, and Globaltrans’ suppliers are expected to uphold the highest standards in terms of respecting and safeguarding human rights. According to the UN Global Compact, basic rights include freedom of speech, privacy, health, life, liberty and security, as well as an adequate standard of living.

Businesses should help protect these rights by providing safe working environments free from harassment, fear, risk of injury, disrespect, discrimination or inequality. They should respect employees’ privacy and freedom of expression and help provide for an adequate standard of living including adequate food, water and housing. Not only should businesses promote these rights, they should act to remediate infringements of the rights of employees and other stakeholders.

### **Forced Labour and Child Labour**

Suppliers will not use, be complicit in or benefit from any form of forced, bonded or indentured labour. Corporal punishment is not acceptable and must not be tolerated. Suppliers will provide productive work that delivers a fair income in an environment that is decent, safe and secure. All work must be voluntary and all workers must be free to terminate their employment at any time. Suppliers will not hold workers’ identity, immigration or work permit documents longer than reasonably necessary for administrative processing.

Child labour is a form of exploitation and suppliers shall not employ children as defined by the ILO Convention and must comply with all other applicable child labour laws.

## **Compensation and Working Hours**

Suppliers are expected to comply with all applicable local laws and mandatory industry standards regarding working hours, overtime, wages and benefits. The supplier shall pay workers in a timely manner and clearly convey the basis on which workers are being paid. Work should deliver a fair income for the tasks undertaken and, as stated above, the labour provided must be voluntary and freely given.

## **Freedom of Association and Collective Bargaining**

Suppliers should respect the right of employees to freely associate and establish or join groups for the promotion or protection of their employment. They should also respect employees' right to bargain collectively.

## **Diversity**

Suppliers should make decisions on hiring, promotion, development and compensation based on the employees' abilities and skills related to the job. These decisions must not be based on factors such as race, colour, religion, nationality, gender, sexual orientation, disabilities or age. In addition, suppliers should recognize and promote the value of diversity in the workplace.

## **Health and Safety**

Suppliers are expected to ensure that their employees are offered a safe and healthy working environment. Adequate health and safety policies and procedures shall be established and followed. Employees should be made aware of these policies and should be encouraged to report any incidence that poses a risk to their health and safety.

## **Environment**

Suppliers are expected to comply with all applicable environmental laws, regulations and standards as well as to implement an effective system to identify, assess, manage and ideally eliminate potential risks to the environment. Suppliers should strive to take prudent steps to minimise waste by reducing, reusing, and recycling materials; encourage conservation of resources and energy; support efforts to establish and implement policies that protect the environment; and provide training and education for employees in respect of the foregoing actions.

## **Data Protection and Disclosure of Information**

Everyone has a right to privacy. Suppliers are expected to safeguard and make only appropriate use of sensitive information including confidential, proprietary and personal information. Information should not be used for any other purpose than for which it was provided. Suppliers should respect the intellectual property of Globaltrans and others.

## **Bribery and Corruption**

Suppliers are expected to conduct their businesses in accordance with the highest standards of ethical behavior and refrain from extortion, bribery, and all forms of corruption. They must comply with all national and international anti-bribery laws, regulations and standards and pursue levels of transparency that help to minimise such risks.

## **Raising Concerns**

If suppliers identify a situation or issue in relation to this Code that could reasonably affect Globaltrans' business and/or reputation, they are expected to notify the Group at the earliest opportunity.

Contact details for the Group and its subsidiaries are available on the Group website [www.globaltrans.com](http://www.globaltrans.com)