

United
Transline

Supplier Code of Conduct

2024



Introduction

The mission of “United Transline”, UAB (further United Transline) is to be a trusted vehicle transportation and logistics partner for European and global companies, offering experience, efficiency and transparency while delivering freight transportation services by road or sea on time. We can only achieve this purpose by adhering to the highest ethical standards, acting responsibly within our business practices, and by being able to build on a global Supplier network that shares similar values.

We rely on collaborative efforts with our direct Suppliers to enhance transparency and operational efficiency. Your cooperation as a Supplier is paramount for the achievement of this goal and serves as the foundation for the success of our partnership.

1.1 Purpose

The purpose of the United Transline Supplier Code of Conduct (hereinafter referred to as the “the Code”) is to define minimum sustainability requirements and aspirations for all United Transline Suppliers, in the areas of environmental, social and governance performance. The Supplier Code of Conduct is based on the United Transline Code of Conduct, as well as international standards such as the United Nations Global Compact, SASB and MSCI materiality assessments for transportation industry, and the International Labour Organisation’s (ILO) Fundamental Principles and Rights at Work.

1.2 Scope

The Supplier Code of Conduct is an integral part of the agreement between Supplier and United Transline.

The term “Employee” used throughout this Supplier Code of Conduct covers everyone working for or on behalf of a Supplier, including but not limited to full and part-time employees, consultants, contractors, trainees, temporary workers, migrant workers, senior management and board of directors.

The Supplier Code of Conduct applies to all Suppliers that deliver goods and/or services to any entity of United Transline, including their parent, subsidiary or affiliate entities as well as their respective employees and agents (hereinafter individually and collectively referred to as “Supplier”).

1.3 Expectations of our business Suppliers

At United Transline, we are committed to conducting our business in a responsible and ethical manner, while upholding the highest standards of quality, safety, and professionalism in our operations. We expect our Suppliers and partners to share this commitment and adhere to the following Supplier Code of Conduct when conducting business with or on behalf of our company.

2. Environmental responsibility

Protecting nature in the environment in which we operate is vital to United Transline, and we expect our Suppliers and partners to share the same view. Our Suppliers must comply with all national and international environmental standards and laws that apply to its location of business. In addition, we expect Suppliers to commit to international agreements on environmental protection, and demonstrate continuous efforts to reduce their environmental impact and mitigate risks.

By safeguarding the environment, conserving natural resources, and consistently working to reduce the environmental footprint of their manufacturing, products, and services throughout their life-cycles, United Transline expects its Suppliers to lessen their adverse environmental impacts. The stages of the life cycle include the procurement of raw materials, design, production, delivery and transportation, use, end-of-life care, and final disposal. Suppliers are expected to take care of environmental complaints and breaches in a methodical manner and, if relevant, to inform United Transline and any appropriate external parties as well as the impacted Employees about such cases.

2.1 Establishment of an Environmental Management System

In our business activity, United Transline follows ISO 14001 environmental management standard. All Suppliers too shall, upon the request of United Transline, introduce and operate an environmental management system according to ISO 14000 and/or ISO 14001.

We expect our Suppliers and partners to adopt environmentally responsible practices, including emissions reduction, waste management practices, and taking part in related activities that strengthen environmental protection.

The Supplier is expected to have a competent body for environmental sustainability, have a policy in place that ensures environmental compliance and train its Employees accordingly.

2.2 Energy and carbon emissions (incl. Air Pollutant Management)

Suppliers shall adhere to all applicable local, regional, and international laws, regulations, and standards related to energy efficiency, carbon emissions reduction, and air pollution management. Suppliers should actively work towards reducing their carbon emissions, minimizing air pollutants, and improving energy efficiency associated with their business activities. This may include but is not limited to implementing energy-efficient technologies, utilizing renewable energy sources, adopting advanced pollution control technologies, adhering to emission limits, optimizing processes, and investing in energy-efficient equipment, amongst other means to demonstrate commitment to environmental impact management.

Suppliers shall ensure transparency with regard to their own emissions as well as those of the upstream supply chains (e.g. by using life cycle assessments (LCA)), and to set reduction targets, including targets that apply to their supply chain.

2.3 Waste management

Suppliers shall adhere to the highest waste management standards, as well as the most recent local and regional laws, regulations, and guidelines to handle waste in a responsible manner. This includes but is not limited to waste collection, transportation, disposal, and recycling of waste materials generated by Supplier activities. It encompasses practices aimed at reducing waste generation, promoting recycling, and ensuring proper waste treatment and disposal of, with a special focus on the proper treatment of the hazardous waste, to minimize negative impacts on the environment and public health.

All output shall be monitored, tracked and documented on both the site and corporate level and be provided to United Transline upon request.

3. Social Responsibility

At United Transline, we strongly believe that Employees are the company's most important asset. Thus, it is crucial we ensure relevant and appropriate working conditions throughout our supply chain. Suppliers shall ensure human rights, fair labor conditions, and protection against discrimination for all people across their business operations. Suppliers are also expected to carry out human rights due diligence in order to ensure that these requirements are met at all times.

3.1 Labor (Child, Forced) and Slavery

United Transline bases its labor practices on the requirements of the UN Guiding Principles on Business and Human Rights and does not tolerate any forms of modern slavery, child and forced labor.

The Supplier shall ensure that there is no forced labor, as well as safeguard that no other forms of modern slavery in the sense of servitude and work performed under duress or human trafficking are tolerated. Any cases of violation of these principles shall be reported to United Transline and relevant regulatory authorities.

3.2 Right to collective bargaining

At United Transline, we respect workers' rights and aim at fostering better working conditions, fair wages, and a positive work environment, while promoting fair and balanced relationships between employees and management.

Our Suppliers shall therefore respect and uphold workers' rights to freedom of association, the right to join or form labor unions, and the right to engage in collective bargaining without fear of retaliation, harassment or discrimination.

3.3 Anti-discrimination

We do not tolerate any form or shape of discrimination against other employees, Suppliers or partners regardless of one's gender, race, religion, marital status, age, political opinion, nationality, disability, health, sexual orientation, etc. Suppliers must adhere to these principles and enable anti-discrimination policy in their business to ensure equal treatment of their employees, and those of their partners and Suppliers. Suppliers are encouraged to promote employee diversity within their sphere of influence.

3.4 Health and safety

Suppliers shall provide safe and healthy working conditions to their Employees, including protection against workplace hazards and exposure to toxic substances. This includes but is not limited to the practices, policies, and procedures implemented to safeguard the physical and mental well-being of their employees, contractors, visitors, and other stakeholders within the workplace to foster a safer workplace for all.

Safety information shall be made available to everyone in order to educate, train, and protect the Employees from safety hazards.

3.5 Remuneration

United Transline is committed to appropriate compensation practices.

Suppliers shall ensure equal and fair pay to their employees, regardless of their gender, for the same job and level of experience. Suppliers must ensure living wages for their employees, and conduct fair remuneration practices across their business. Supplier shall always pay and provide its Employees' wages and benefits that, as a minimum, comply with applicable laws and collective bargaining agreements.

Supplier shall provide its Employees with information about their employment terms and conditions, including benefits, in a format and language they can easily understand, such as a written employment contract and a timely wage statement.

3.6 Local communities

We feel responsible for the people and local communities including but not limited to residents, businesses, indigenous groups, and other stakeholders, who we directly and indirectly impact with our business activities. Therefore, we aim to ensure that United Transline, as well as its Suppliers maintain transparent and meaningful relationships with local communities, respect and protect their rights, cultural heritage, and traditions, and promote economic growth, among other activities, to positively impact local communities, and contribute to their overall well-being and development.

3.7 Working Hours

Suppliers must ensure proper working hours to their employees, as part of providing proper work conditions, and ensuring well-being at work. Suppliers shall always respect and comply with applicable laws and collective bargaining agreements, if applicable, on working and resting hours, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.

Any violations of working conditions shall be reported to local authorities and United Transline.



4. Governance information

Conducting responsible business is an integral part of our corporate values. Suppliers shall comply with all legal requirements that apply to their business operations, including those of antitrust and competition, corruption prevention, and data protection.

4.1 Corporate due diligence

United Transline values reliable and transparent business partnerships. We aim to work with Suppliers which uphold high ethical, legal, safety, and environmental standards throughout their activities. At United Transline, we follow ISO 9001 standards for supply chain management, and expect our Suppliers to follow the same management practices.

Suppliers are expected to establish a due diligence process with appropriate measures to ensure that its Suppliers and subcontractors, in turn, also comply with the standards and rules set out in this document.

4.2 Data protection, information security and disclosure of information

We respect the right to privacy and demand all our Suppliers to comply with up-to-date local, global and international regulations to provide data protection, information security, and prevention of any disclosure or leakage of personal or business information. Any violation of data protection rights shall be reported and sanctioned, if applicable.

4.3 Financial responsibility

Suppliers have a duty to follow the law, uphold a high standard of corporate ethics, and make sure that it is in accordance with national financial responsibility policies and legislation. The Supplier must notify United Transline immediately and take all appropriate measures to ensure operational continuity and financial responsibility and, where possible, compensate any impact and effects to its related parties. Should this duty not be followed, partnerships may be suspended.

4.4 Critical Incident Management

Suppliers must aim to prevent any critical incidents, including but not limited to workplace accidents, natural disasters, hazardous material spills, terrorist threats, and other emergencies, from happening in order to provide stable business services. Suppliers shall also have a well-defined critical incident management system, robust plans, protocols, and resources established to effectively respond and mitigate unexpected and high-impact adverse business events. In an occurrence of such an event, the Supplier must notify United Transline immediately and take all appropriate measures to ensure operational continuity, minimize the risks and, where possible, compensate any impact and effects to its related parties.

4.5 Conflicts of interest

Suppliers must disclose any actual or potential conflicts of interest due to either personal or business relationships with anyone, including but not limited to suppliers, business associates, competitors or employees. We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Should such a case occur, we will ensure a detailed analysis of the situation and actions will be taken accordingly.

4.6 Export controls and economic sanctions

United Transline does not conduct activities nor assist any other party in violating applicable economic sanctions or export control laws and regulations. Therefore suppliers are expected to comply with applicable economic sanctions and export control laws and regulations and avoid doing anything that would position themselves or the Company in violation of applicable economic sanctions and export controls. Should such cases occur, the partnership may be suspended and discontinued if needed.

4.7 Counterfeit parts

We expect Suppliers to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being delivered. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, Suppliers should provide immediate notification to the recipients of such counterfeit parts and/or materials. Should the recipient not be informed directly and will find out through different channels of communication, further partnerships will be reassessed.

5. Compliance with the code

For United Transline, the commitment of its Suppliers to meet their environmental, social and governance responsibilities is an indispensable prerequisite for any business relationship. Accordingly, the Supplier shall align its business and procurement activities with these principles and address them appropriately along its supply chain.

It is the Supplier's responsibility to implement, comply and regularly review this Code to comply with their business activities, however United Transline commits to ensure that any significant updates are communicated to the Suppliers.

5.1 Communication of CSR / sustainability requirements to the suppliers

All suppliers are informed about the Supplier Code of Conduct document and their need to comply with the requirements via email prior to the engagement/conclusion of the agreement. It is the supplier's responsibility to ensure the document is reviewed regularly and appropriate implementations or updates are made within the organization if needed. The Code is also made publicly available on the website of the United Transline unitedtransline.it/code-of-conduct.

5.2 Handling Violations and Reporting Channels

In case of violation of conditions of this Code, all interested parties are encouraged to contact United Transline and relevant local authorities. Irrespective of the manner in which such reports are made, all reports of possible violations shall be reported by e-mail info@unitedtransline.it, and will be promptly, fairly and thoroughly investigated with appropriate internal and/or external assistance. United Transline shall implement all measures to protect persons notifying violations of the Code against any negative consequences: the e-mail address referred to above shall only be accessed by a designated officer, who shall assume the obligation to not disclose the identity of notifying persons to any employees or other third parties.

Upon request, the Supplier shall fully and truthfully answer questions from United Transline about compliance with its obligations under this document, including its actions, any violations, and grievances.

In the event of non-compliance with the provisions of the Code, we will immediately take disciplinary action, including dismissal, revision of the business agreement and/or termination of the contract.

6. Final provisions

- The Code shall be approved and amended by the decision of the Management Board of United Transline.
- United Transline's designated officer shall be responsible for annually reviewing and, where needed, updating the Code.
- United Transline's designated officers' shall be responsible for introducing the Code and its principles to the Suppliers.
- Each employee shall be responsible for following the principles set out in this Code when interacting with Suppliers.
- The Code shall be made publicly available on the website of the United Transline.