

Code of Ethics of the Company

1. Introductory Provisions

As part of its strategy in providing railway freight wagon rental services, Cargo Wagon aims to establish high standards of honest business conduct. The Code of Ethics helps ensure that the company's daily activities and employee behaviour align with these principles.

The rules of the Code of Ethics are based on the organisation's values and principles and define the standards of professional conduct. Violations of these rules will be treated as a serious breach of work discipline under Directive 2/19 – Work Regulations.

2. Subject and Scope of the Internal Directive

This internal directive sets out the rules, procedures, and principles that company employees must follow in performing their job duties, both within the company and in cooperation with external entities.

The directive applies to Cargo Wagon as an employer (including members of statutory bodies) and all employees. It is available to third parties on the company's website.

Cargo Wagon ensures that its business partners are appropriately informed of this directive. Every employee is responsible for adhering to its rules.

3. Behaviour and Conduct of Employees

3.1. Basic Behavioral Requirements

Shareholders, board members, and employees of Cargo Wagon must conduct their activities in compliance with legal regulations and the company's Code of Ethics.

Managers serve as role models of moral and ethical standards for other employees and are responsible for monitoring compliance with the Code. Employees must perform their duties to the highest standards and continually develop their professional skills.

All employees must act courteously, respectfully, fairly, and conscientiously in line with Cargo Wagon's values. They must treat all individuals they interact with equally, without prejudice based on race, gender, social origin, nationality, sexual orientation, financial status, health, marital status, faith, or political or union affiliation.

Employees must avoid any actions that could harm the company's reputation.

An employee of Cargo Wagon handles work-related matters responsibly and without unnecessary delays. They always strive to prevent unnecessary costs. The employee makes every effort to ensure the maximum efficient use of equipment, materials, services, and financial resources entrusted to them within their scope of work or provided to them.

3.2. General Principles of Employee Conduct

An employee of Cargo Wagon must adhere to the following principles:

- Act without malice, bias, or favouritism.
- Respect the opinions and competencies of others.
- Avoid undue peer pressure.
- Foster mutual trust and respect.
- Prevent personal relationships from influencing work decisions.
- Demonstrate integrity and accountability.
- Avoid being swayed by flattery.
- Avoid deflecting responsibility onto others.
- Remember they work for the benefit of others.

3.3. Conflict of Interest, Anti-Corruption Measures

Employees must avoid conflicts between personal and company interests. They must act in the company's best interest when dealing with customers, suppliers, public officials, investors, and competitors, regardless of personal benefits. If an employee encounters a potential conflict of interest, they must promptly inform their superior.

An employee of Cargo Wagon shall not prioritise their personal interests over the interests of the company or allow any financial or other benefits to arise. Personal interest is defined as any interest that brings personal advantages to the employee, their family, close associates, or legal or natural persons with whom they have or have had business or similar relationships. If an employee of Cargo Wagon is unsure whether a situation constitutes a conflict between their personal interest and that of the company, they shall discuss the matter with their superior or the Chief Operating Officer (COO).

An employee of Cargo Wagon shall neither request nor accept gifts or favours for themselves or their family that could directly or indirectly influence the company's decision-making (e.g., during procurement) or compromise Cargo Wagon's professional approach. If an employee is offered any benefit in connection with their employment, they are obliged to refuse it and inform their superior or the COO of the matter.

An employee of Cargo Wagon shall not allow themselves to be placed in a position where they are obliged to return a favour or provide a reciprocal service in connection with their work. They actively support ethical behaviour and contribute to fostering an anti-corruption environment. If an employee legitimately reports a conflict of interest, corruption, or other unethical behaviour, their actions will not have any negative consequences on their employment or a similar professional relationship.

Cargo Wagon conducts periodic training for its employees on anti-corruption measures.

4. Ethical Principles

4.1. Compliance with Laws

Compliance with the law is the foundation of a company's ethical standards. Cargo Wagon and its employees adhere to all applicable laws, regulations, and standards. In cases of conflict between the Code of Ethics and legal requirements, legal compliance takes precedence.

4.2. Fair Competition

Cargo Wagon honours and adheres to the principles of fair and open economic competition. Each company representative upholds these principles through their actions, preventing and avoiding any situations that could lead to their violation. Employees of the company must never engage in cartel activities, such as negotiating the exchange of information with competitors or business entities regarding price increases or the stabilisation of sales prices, concluding bid-rigging agreements (discussions with competitors or business entities regarding price offers or deciding who will be the successful bidder in a competition), or other illegal business practices that hinder free and fair competition.

4.3. Offering or Requesting Benefits

Employees of Cargo Wagon must not provide any gifts, payments, rewards, services, vacations, or hospitality to any individuals or organisations with which the company has a business relationship (such as customers or suppliers), or to competitors of the company, nor may they request or accept such benefits, except when they are customary business courtesies directly related to the professional duties of the involved parties. Relationships with suppliers and customers must always be based solely on competitive conditions, including quality, price, and services that offer the greatest benefit to Cargo Wagon.

4.4. Compliance with Supplier Conduct Principles

Cargo Wagon requires its suppliers to adhere to the same standards of conduct that this Ethical Code establishes for the company itself.

4.5. Intellectual Property Rights

Cargo Wagon protects its own trade secrets and respects the intellectual property rights of others. Employees must not obtain confidential information from other parties through unauthorised means, nor disclose such information without permission.

4.6. Employee Relations

Cargo Wagon values strong and stable relationships with all its employees, built on mutual respect and dignity. The working conditions provided to employees comply with legal standards, regulations, and relevant conventions. Child and forced labour are strictly prohibited. In terms of employee care, the company offers superior working conditions, a stress-free work environment, a balanced professional and personal life, and various opportunities for personal growth.

4.7. Protection and Use of Company Assets

Cargo Wagon employees must ensure the protection and efficient use of the company's assets. Theft, irresponsible handling, or wastefulness directly impact the company's business performance. Any suspicion of misuse or theft must be reported and investigated. Company assets may not be used for private business activities, except in cases where incidental or expressly authorised private use by the company is permitted.

The obligation of employees to protect the company's assets also extends to information and intangible assets. These include intellectual property, trade secrets, patents, trademarks, business plans and ideas, designs, databases, records, salary information, and undisclosed financial data. Unauthorised use or distribution of such information and intangible assets is a serious violation of work regulations. Furthermore, such use or distribution may be unlawful and could lead to civil or criminal liability.

4.8. Fraud and Money Laundering

Cargo Wagon has established appropriate internal control policies and procedures to prevent and avoid activities related to money laundering or fraud. These procedures include special monitoring of all complex transactions or those with an unusual economic or legal purpose, or that show signs of simulation or fraud. This applies, among other things, to transactions carried out in cash or through companies based in tax havens.

All Cargo Wagon employees who handle financial resources have undergone training in this area.

4.9. Environmental Protection

Cargo Wagon complies with all environmental protection regulations. In all its activities, the company prioritises environmental protection. Environmental protection is a fundamental part of Cargo Wagon's Quality Policy.

5. Complaints, Feedback, and Code Violations

The company will not take any retaliatory action against an employee who reports a potential violation of the Ethical Code. This means they will not be dismissed or otherwise discriminated against for reporting possible breaches of the rules. This does not apply to individuals who knowingly make false accusations or intentionally provide incorrect information.

If an employee violates the Ethical Code, disciplinary measures may be taken against them in accordance with legal regulations and the company's internal principles and rules, as stated in Directive 2/19 – Work Regulations. Appropriate disciplinary measures may also be applied to members of statutory bodies and company executives in cases of Ethical Code violations.

The company will fairly and thoroughly investigate all reports and take the necessary measures. It will also make every effort to protect the identity of the complainant. The same applies if the complainant requests the company to treat the provided information as confidential.

6. Final Provisions

The Chief Operating Officer (COO) is responsible for monitoring compliance with the provisions of this internal directive. The content of the internal directive is regularly reviewed, evaluated, and updated at least once a year by authorised employees.

The internal directive comes into effect on 1 February 2021. Matters related to the subject of this directive that arose before its effective date will be governed by this directive from the date of its enforcement.

All employees will be informed about the company's Ethical Code.