ETHICAL CODEX FOR BUSINESS PARTNERS

EWG Rail Ltd.
Applicable: 30.08.2024.

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THE PURPOSE OF THE CODE OF ETHICS:

The purpose of EWG Rail Ltd.'s Code of Ethics is to provide a guide to fair competition, honest business conduct, and acceptable market and other business practices.

The content of the Code of Ethics is drafted in accordance with and fully complies with the relevant legislation. Compliance with this Code of Conduct is mandatory for all and is valid until revoked.

This Code of Ethics sets out the principles and general values of fair competition and cooperation between companies, which our company requires its business partners to fully respect. Our company also expects all its business partners to comply with the national and international legislation in force.

HEALTH AND SAFETY AT WORK

Our business partners have a responsibility to ensure a safe working environment. Our business partners provide a safe and healthy working environment, safety training and ensure the safety of their products and services. The business partner also complies with applicable laws and other legal regulations and pays its employees appropriate wages.

EQUAL OPPORTUNITIES / DIVERSITY

Our business partners support diversity in their companies and do not tolerate discrimination in the employment of staff.

FREEDOM OF ASSOCIATION / RIGHT TO COLLECTIVE BARGAINING

The company's business partners respect the freedom of association and the right to form interest groups and protect the rights of their employees in their business segments. They also protect workers' rights to freely elect their own representative bodies and to bargain collectively.

HUMAN RIGHTS

Our business partners respect universally accepted human rights. They fully reject child labour and comply with applicable provisions prohibiting child labour. They also ensure that workers are not subjected to inhuman or degrading treatment.

ENVIRONMENT

We expect our business partners to be aware of and comply with applicable environmental laws, rules, resolutions and other regulations, and to monitor changes to them. It is further expected that the business partner will continuously assess its processes and products for negative environmental impacts and, where necessary, take appropriate action and implement effective measures that reflect its sense of responsibility for the environment.

ANTI-CORRUPTION MEASURES

Our company will not tolerate any form of corruption or other unfair business practices. Transparency and openness are essential requirements for trust and credibility in our business activities and in our relationships with our business partners.

Our business partners undertake to take all necessary measures to prevent corruption and to take all necessary organisational and personnel measures to comply with all criminal and other legal provisions to combat corruption.

INVITATIONS AND GIFTS

In the course of their business, our business partners will only accept or initiate invitations in appropriate circumstances, in the hope of or in return for any unfair advantage or other special treatment, and will not violate any applicable laws (in particular anti-corruption laws). The same applies to any gifts or other inducements or benefits.

Our business partners donate only on a voluntary basis, not in the hope of something in return. Sponsorship by individuals, groups or organisations is not used to gain unfair business advantage.

FAIR MARKET CONDUCT

Our business partners commit not to violate antitrust or other laws that protect unrestricted competition. They will not enter into agreements or understandings that affect prices, terms, strategies or customer relationships, especially when participating in public procurement. The same applies to the exchange of competitively sensitive information or any other action that unlawfully restricts or may restrict competition.

EXTERNAL ECONOMIC RESTRICTIONS

With regard to global business activities, our business partners ensure compliance with all applicable laws and regulations relating to the import and export of goods, services and information, as well as relevant embargoes and sanctions. They also undertake to comply with all relevant foreign economic legislation. Business partners undertake to take appropriate measures to prevent violations of sanctions provisions.

MONEY LAUNDERING AND TERRORIST FINANCING

Our business partners are taking appropriate measures within their companies to prevent money laundering and terrorist financing within these companies.

CONFLICT OF INTEREST/CONFLICT OF INTEREST

Our business partners, in their economic relationship with our company, undertake to avoid situations where their own interests may conflict with the interests of the company. Our company expects that potential or actual conflicts of interest should be disclosed to the contact person and the company's management in a timely manner.

SUBSCRIBERS

Our business partners undertake to comply fully with and enforce the law and this Code of Conduct, not only for themselves but also for the subcontractors they employ.

SCANNING

With regard to cooperative business relationships, in the event of a minor breach of the Code of Conduct, the business partner will be given the opportunity to implement appropriate corrective measures within a reasonable timeframe, provided that it shows willingness to remedy the breach.

In the event of serious breaches of the Code of Ethics (in particular with regard to criminal offences committed), our company reserves the right to apply appropriate sanctions to the business partner concerned. This may result in the immediate suspension of the business relationship, as well as claims for damages and other legal remedies.

Enacting provision:

These Rules shall enter into force on 30 August 2024.

Signed and approved by the CEO on 30 August 2024.

Issuing a document

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