



# Code of Conduct



**'We power the global economy'**



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# Welcome



Dear colleague,

As we continue to grow globally, it is important that we continue to reflect on how we work together, how we interact with our global communities, how we treat our stakeholders and how we treat one another.

With over 3,000 of us working across more than 150 countries, we each have a role to play in making a real difference for our customers, our teams, our communities, and our stakeholders. Our values, our behaviours and how we treat each are key to our continued success.

At EV Cargo, we're about "doing the right thing", always. Our Code of Conduct lays out our expectations and is supported by other policies and procedures within the business. This code dictates our success, it sets out our blueprint to allow us to grow, innovate and take our sustainable ethics seriously.

What we achieve as EV Cargo is entirely dependent on how we all individually put our values and our behaviours at the centre of everything we do every day, always. We need to live and breathe our Code of Conduct and my commitment to you all is to always demonstrate this behaviour in every interaction I have.

Let's work together to build our trust and confidence in each other – every single day.

Thank you.

A handwritten signature in black ink that reads "Heath Zarin". The signature is fluid and cursive, with the first letters of "Heath" and "Zarin" being capitalized and prominent.

HEATH ZARIN  
Founder and CEO



# Living With Our Mission, Vision, Values & Behaviours

At EV Cargo we work hard within our framework of how we do business, internally and externally. This is who we are, our essence.

## Mission



**We manage supply chains for the world's leading brands.**

This is the everyday focus of our people in serving and creating value for our customers, powered by a relentless focus on operational excellence and deep domain knowledge. In addition to moving freight and managing physical logistics operations, we manage the information flow and the processes of those supply chains on behalf of our customers.

## Values



**We are guided by our values of growth, innovation & sustainability.**

We want to deliver the best possible logistics services to our customers to allow them to grow. We will do that by innovating and using technology to produce new products and services. We are sustainable and we have an integrated approach to environmental, social and economic impact issues, which leads to long-term sustainable profit growth.

## Vision



**We will transform logistics into a technology sector.**

This is the vision of what we want to achieve: a paradigm shift in how the logistics industry thinks about itself and is perceived by its customers and investors, by driving digital transformation of the sector. This is our long-term vision, which we will continue to invest in and deliver. We will ensure that we are in the strongest position to develop and deploy the transformational technology required to power our operating model and customer proposition.

## Behaviours



**Our behaviours dictate how we operate every day.**

- Agile execution
- Honesty in everything we do
- Build trust in each other
- Ask questions
- Impact our community through considerate actions and social responsibility
- Work together
- Challenge the norm and learn from failure
- Always look to improve on everything we do
- Diversity, equity and inclusion



# Anti Bribery & Corruption

EV Cargo has a zero-tolerance approach towards bribery and corruption and we always comply with the applicable anti-bribery and corruption legislation. If you are ever concerned or in any doubt regarding bribery and corruption you should speak to your immediate manager or one of the senior leadership team.

**You must  
never accept  
or offer a bribe  
of any kind.**

Bribery can take many forms beyond cash payments such as gifts, travel, entertainment or any other undue advantage.

EV Cargo will not engage in any form of active or passive bribery and expressly prohibits its employees from engaging in any form of bribery.

The prohibition also applies to any contributions or payments made through consultants, suppliers or other third parties on behalf of EV Cargo.

Moreover, EV Cargo prohibits facilitation payments, which are usually small payments mostly made to

lower-level governmental employees to secure the performance of routine government actions.

Violations of anti-bribery laws can lead to costly enforcement actions and harsh criminal penalties.

**The prohibition of bribery includes instances where it takes the following forms:**

- Charitable donations
- Payment of travel expenses
- Delivery of products and/or services
- Disproportionate entertainment expenses
- Transfer of other personal or financial benefits

## Example of offering a bribe

Offering to pay for a leisure break for a potential customer, but only if they agree to do business with EV Cargo.



This would be viewed as offering a bribe as it could be seen as the leisure break was given to gain commercial and contractual advantage.

## Example of receiving a bribe


A supplier offers a relative a job and makes it clear that in return you are expected to use your influence to ensure that EV Cargo continues to do business with the supplier.



This would be viewed as receiving a bribe as it could be seen as the job offer was given to gain commercial and contractual advantage.

# Money Laundering

Money laundering is an illegal process where funds from illegitimate activities are transformed into assumed legitimate assets. Often such activities are related to financing terrorism or evading international sanctions.



**You must not engage in money laundering or any activity that facilitates money laundering or the funding of terrorism or any other criminal activities.**

EV Cargo is committed to complying with anti-money laundering and anti-terrorism laws throughout the world. We will conduct business only with reputable customers that are involved in legitimate business activities, with funds derived from legitimate sources.

Colleagues must always collect and understand documentation about their customers and business

partners to ensure that they are involved only in lawful business activities and their funds are of lawful origin.

Reasonable steps must be taken to prevent and detect unacceptable and suspicious forms of payment. EV Cargo will not process information deemed to be of illegitimate nature or unlawful.

We will not enter into or tolerate arrangements which facilitate or appear to be used for facilitating acquisitions, retentions, uses, or control of money payments intended to disguise crimes.

You should be cautious of customers unwilling to give all required information or insisting on payments in cash.

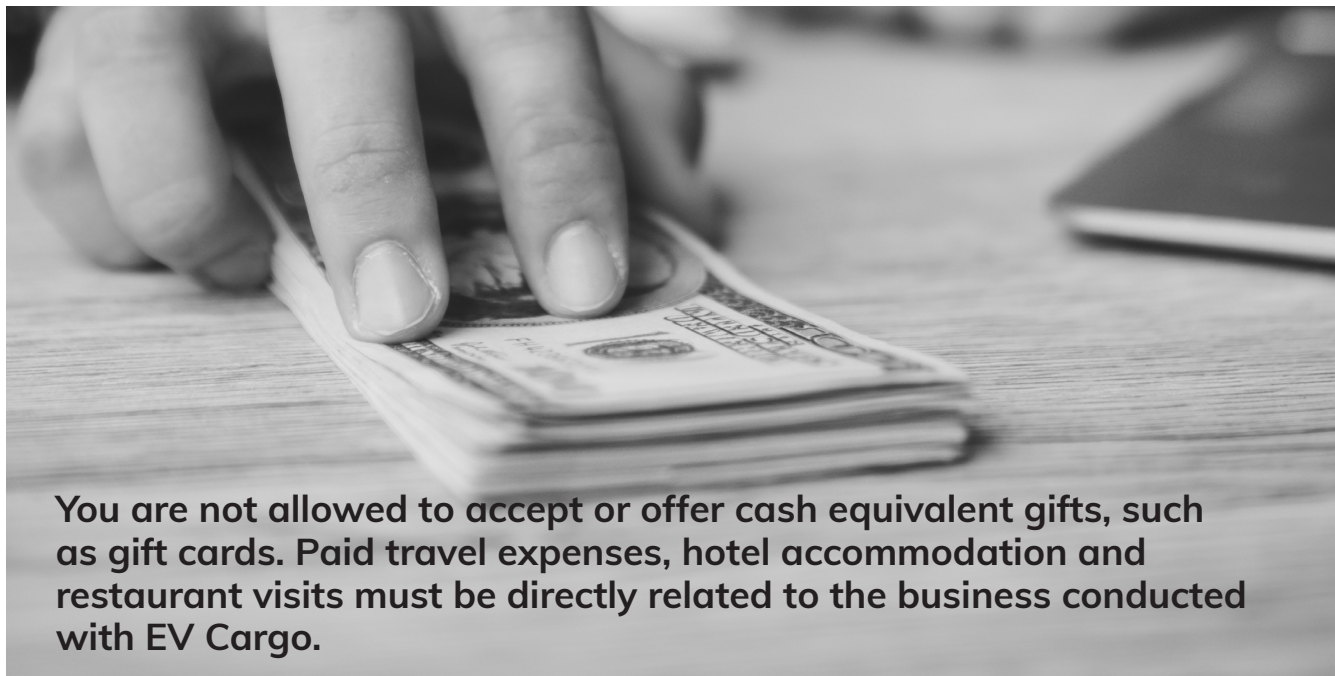


# Gifts & Donations

EV Cargo recognises that business gifts, hospitality and entertainment on a modest scale are often a regular part of doing business and are used to build goodwill and strengthen working relationships.

However, if such offers become frequent or are of substantial value, they may create the appearance of or engender an actual conflict of interest or improper payment.

What is considered reasonable will often depend on the country and the culture, you should seek guidance from your manager if you are in any doubt over what is reasonable or not.



**You are not allowed to accept or offer cash equivalent gifts, such as gift cards. Paid travel expenses, hotel accommodation and restaurant visits must be directly related to the business conducted with EV Cargo.**

## Example of a reasonable gift

Tickets to concerts, shows and events or similar with business partners, as well as small promotional items.



## Example of an unreasonable gift

As part of a tender process for a new supplier you are supporting the selection process. During the negotiation period, one of the suppliers has offered theatre tickets to you.



You should not accept the gift as it is not related to the business conducted with EV Cargo.

## CHARITY DONATIONS

Charitable donations are voluntary unilateral contributions from donors for charitable purposes only, without the expectation of services in return. Donations may fall under certain laws and regulations in some countries and may give rise to tax implications in some instances.

## POLITICAL CONTRIBUTIONS

Colleagues can participate in political activities in their own personal capacity as long as their position does not conflict with their work. When needed, such conflicts are to be transparently disclosed.

EV Cargo itself does not make political contributions, whether in monetary payments or donations in kind anywhere in the world.

## SPONSORSHIPS

EV Cargo funds may be used for sponsoring activities. Sponsorships must be based on bilateral arrangements in which the involved parties agree to specific services in return. Most often such services in return relate to marketing and promotion.

Sponsorships shall never be misused for obtaining undue advantages.



**EV Cargo funds, property and services must not be used to support political purposes.**



# Competition & Fair Dealing

EV Cargo is committed to complying with all applicable competition legislation.

Worldwide anti-trust laws generally prohibit agreements, understandings and actions which may restrain trade or reduce competition.

Violations of such laws do not require explicit promises or trade-reducing agreements; violations can be established with circumstantial evidence.



Due to the complexity of anti-trust law, colleagues are strongly advised to consult our Legal & Compliance team with any questions.

## You must not participate or be a party to:

- Price fixing
- Market sharing and dividing markets
- Limitation or controlling of production or capacity
- Exchange of information concerning prices or other terms and conditions regarding EV Cargo, suppliers or other related third parties
- Meetings, conferences, forums, committees, etc organised by a trade or industrial organisation and which may have an anti-competitive effect

## Example of price fixing

Local trade associations, e.g. freight forwarding associations, sometimes issue fixed tariffs for local services, e.g. an import fee. Several freight forwarders have historically observed such fixed tariffs.



Such a practice would be interpreted as price fixing and is therefore considered a violation of the EV Cargo Code of Conduct.



## INTERACTIONS WITH SUPPLIERS AND OTHER THIRD PARTIES

EV Cargo works with a large network of suppliers and other third parties that play an important role as enablers for sustainable growth and overall success.

The way supplies are purchased and operations are contracted out affects EV Cargo's reputation as

a responsible corporate citizen. Where necessary, provisions relating to laws, regulations, compliance trainings and auditing are included in contracts with third parties.

## CONFLICTS OF INTEREST

Conflicts of interest exist when positions within EV Cargo are used for personal gain aside from the normal compensatory rewards of employment.

They also arise when business connections are entertained with competitors, customers or suppliers beyond the regular business relationship, or when family members or friends of colleagues have interests in third parties that are in business with EV Cargo.

Conflicts of interest may also become an issue when an employee's personal interest takes precedence over EV Cargo's while that employee is acting within their company capacity. Even the appearance of a conflict of interest could be damaging to EV Cargo's reputation.

Our colleagues shall not participate in any commercial transactions between EV Cargo and a supplier or customer in which he or she has direct or indirect personal interests, financial or otherwise, unless the transaction is made on an arm's length basis (on market conditions). Where this a potential conflict of interest, this should be reported to a senior manager within the business.



# Customs, Export Controls & Sanction Compliance

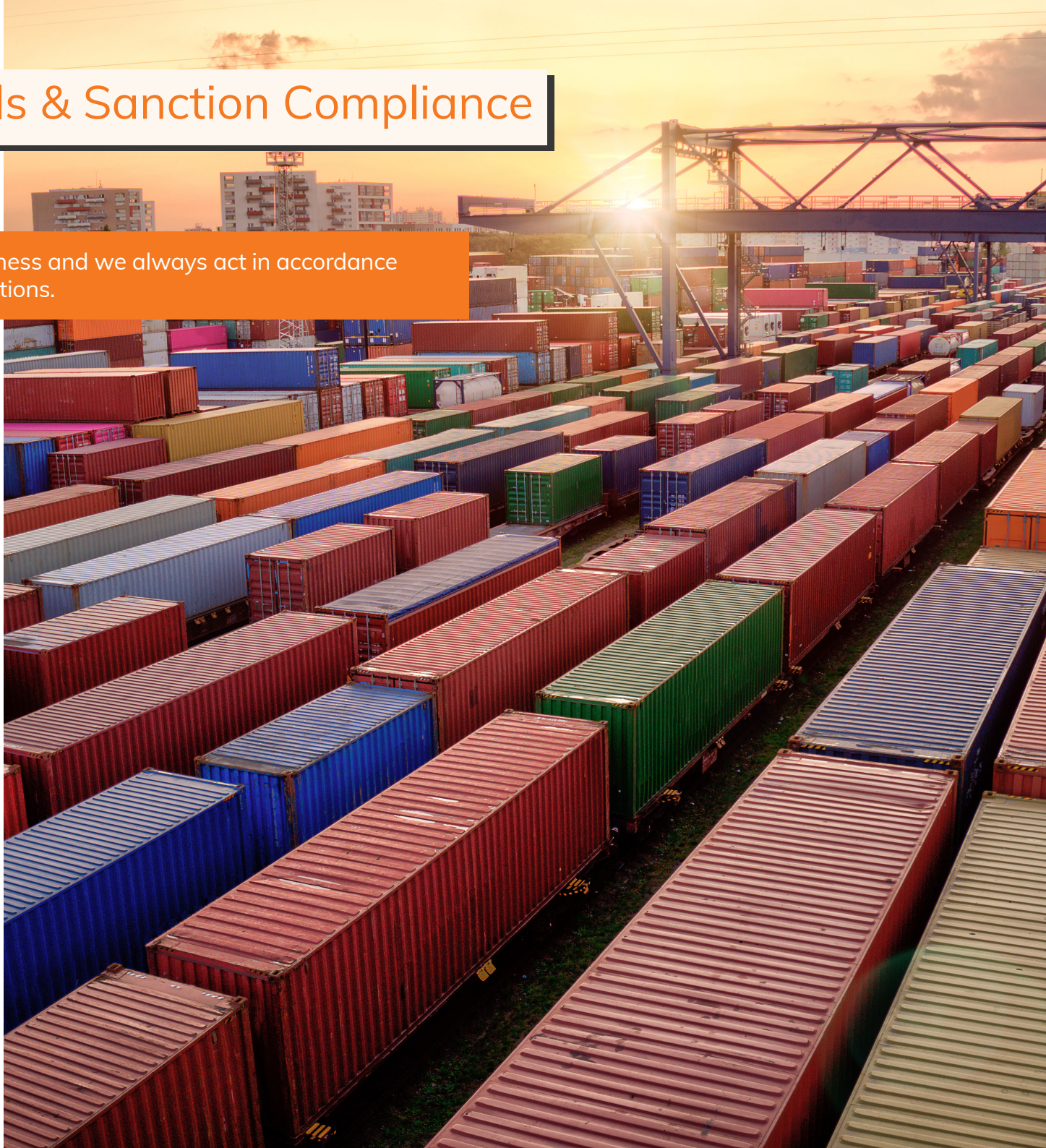
EV Cargo is an international, cross-border business and we always act in accordance with legal regulations and international conventions.

We comply with the applicable laws and regulations on export controls, sanctions and customs clearance in all countries that we operate in.

These legal regulations and international conventions not only relate to the movement of goods they also apply to financial transactions, technology, procurement and the hiring of personnel.

**You can ensure that we comply with the relevant laws and regulations by:**

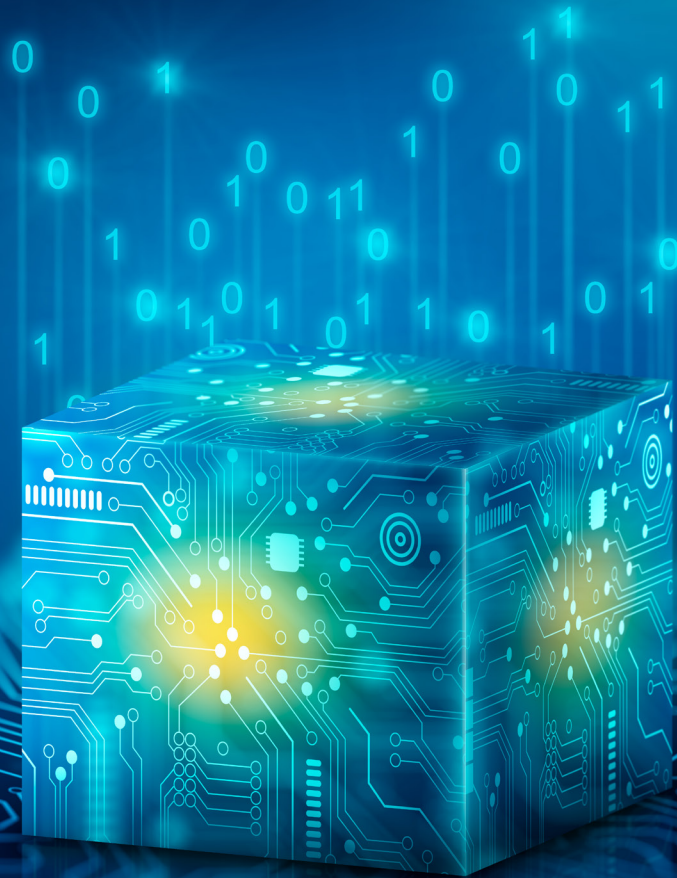
- Ensuring you comply with all regulations governing export controls, sanctions and customs clearance
- Always observing all corresponding internal regulations and guidelines
- Asking your manager, senior leader or legal department if unsure or you have any questions
- Ensuring all relevant training is completed in a timely manner and in line with internal governance





# Processing of Information

**You are not allowed to disclose any confidential or proprietary information received during or after your employment with EV Cargo to unauthorised individuals or third parties.**



## CONFIDENTIALITY

You must respect and protect the confidentiality of information belonging to EV Cargo, our customers, suppliers and other business partners, and we expect you to follow our vision, values and behaviours.

We will ensure that all information and data is handled securely and with care, irrespective of global location. We will respect all local policies and regulations both within the UK and overseas.

Notwithstanding EV Cargo's contractual obligation of confidentiality, it is also compulsory to maintain the confidentiality of its proprietary information and that of its customers and suppliers. Data protection laws grant individuals certain rights in connection with the way in which their personal data is used.

When working with data you are responsible for ensuring that personal data is managed with regard to local data protection laws. This includes ensuring that personal data is securely stored, not kept for longer than necessary and is only used for the purposes for which it was originally provided.

## SOCIAL MEDIA

Our social media and website are key to us communicating to the outside world. We will only publish information that we have permission to use.

Our colleagues must not use social media to make disrespectful or inappropriate comments in relation to EV Cargo, our suppliers or our customers. We do not express the views of others as our own or vice versa.

# Human Rights

Respecting Human Rights is a core value of EV Cargo. We are committed to respecting all internationally recognised human rights. We are committed to fair employment practices and equal opportunities and treatment.

Human rights are moral principles that describe standards of human behaviour protected as natural and legal rights by law.

They are understood to be fundamental rights to which a person is inherently entitled simply because they are a human being. Human rights are inherent in all human beings, regardless of their nationality, location, language religion, ethnic origin or any other status.

EV Cargo commits to all business activities being delivered according to the commonly accepted principles of Human Rights & Dignity. We oppose violations or limitations of Human Rights & Dignity of any kind which includes, but is not limited to, any form of discrimination, slavery and torture, human trafficking or forced and child labour.

## FORCED LABOUR, CHILD LABOUR AND MODERN SLAVERY

EV Cargo is committed to the fight against forced labour, child labour and human trafficking and we have established a Modern Slavery Statement to avoid any form of modern-day slavery and human trafficking in any part of our business and supply chains.

We publish our Group-wide Modern Slavery Statement, which applies to our UK business and global network, as well as an Ethical Trade Policy, which describes expectations of our employees, suppliers and contracts on topics such as child labour, forced or compulsory labour, health and safety, discrimination and living wages.

In addition to implementing training programmes and activities to raise awareness on human rights, EV Cargo also has in place Supplier Code Of Conduct.

## DIVERSITY & INCLUSION

We totally value the diversity of our workforce and see this as a competitive advantage in the markets in which we operate.

Career development is critical to our business and we encourage people to grow as we grow.

We will create opportunities for all by ensuring that we facilitate movement between countries and by providing long-term career progression through continual learning, support for development and specific training to facilitate awareness of unconscious bias.

## DISCRIMINATION & HARASSMENT

We expect all of our colleagues to recognise and support equal human rights. Everyone should stand against discrimination, differential treatment, harassment, inappropriate or unreasonable interference with work performance, whether based on nationality, race, disability or gender expression, sexual, religious or political orientation or ethnic or social background.

Physical, sexual, mental or verbal abuse is prohibited, as is any threat of abuse or any other form of intimidation.





# Our Commitment to Sustainability



EV Cargo is a company committed to sustainability. We are heartened to see the growing consensus on the urgency of climate action and we work with our stakeholders and colleagues to contribute to the global sustainability agenda.

As one of our company's core values, our focus on sustainability runs through everything that we do and our sustainability strategy continues to pick

up momentum year on year. We are progressing initiatives across four focus areas: planet, people, governance and value creation.

In 2022, we issued our inaugural Sustainability Report, which we are incredibly proud of.

We work hard to minimise the environmental impact of our own and our customers' global operations. Our workplaces create a safe and fair environment for all of our people to work and develop their careers.

We are ethically responsible and active members of our local and global communities, seeking to do the right thing, always.

We have an intense focus on being a Responsible Business, and our sustainability strategy is underpinned by our commitment to the United Nations Sustainable Development Goals and we are a proud signatory of the UN Global Compact Principles.

Our progress on diversity, equity and inclusivity has been significant and in 2021 we developed a Diversity, Equity and Inclusivity Policy to enhance our commitment to creating the best possible working environment for you. We believe in providing fair treatment and encouraging, equality, diversity and inclusion among our colleagues.

We are focused on building an organisation where employees are engaged, valued and respected by ensuring our colleagues have a pathway to develop and grow with the business.

We engage our stakeholders on sustainability, focussing on what matters most to them and our business, whilst working to further prioritise our sustainability initiatives.



# Working Together at EV Cargo

As we progress on our journey we will continue to bring new business, customers and suppliers under the EV Cargo umbrella. It is incumbent upon us all to welcome new people into our business, to give them the information they need to work seamlessly with us and to embrace cultures into ours with empathy, dignity and respect.

Our culture programme, Delivering Better, is designed to make EV Cargo a great place to work by continually improving our colleagues' journey with us.

Delivering Better Champions are in each area of the business and are responsible for providing feedback from their area of responsibility to the business on how to make improvements to the colleague experience.

Regular meetings are held and typically discuss areas such as colleague recognition, engagement, community interaction and communication strategies.

Each person in the business will receive updates, written and verbal, digital and visual on new initiatives, improvements and news about how the company is meeting its core values on a regular basis.

Tell us what you think. Our culture is about improving what we do and having the courage to speak out when things go wrong. Mistakes happen, but as long as we know about them, we can deal with them. Being honest shows that we care.

## SPEAK UP

All colleagues are encouraged to speak up when they know of or suspect any improper actions have been committed. Colleagues are also urged to report any concerns of suspected breaches of the principles and rules outlined in this Code of Conduct.

You should use any route you feel comfortable with when raising concerns, this might be through your line manager, a senior manager or one of the HR team.

You can also raise your concern through the whistle blower process and this is documented in a policy which your line manager or HR representative can share with you.

