

APPROVED BY  
order of PJSC TransContainer  
No. ЦКП/2022-29 dated February 10,  
2022

## **Supplier Code of Conduct of PJSC TransContainer**

### **1. General Provisions**

This Code was developed to reflect the requirements of PJSC TransContainer (hereinafter referred to as the “Company”) for current and potential suppliers and contractors of the Company (hereinafter referred to as the “Suppliers”) regarding sustainable development to protect human rights, observe the basics of business ethics, combat corruption and protect the environment.

The Company considers sustainable development as an important condition for doing business in conjunction with such corporate values as team unity, professionalism and safety.

The Company is aimed at maintaining a balance between its own economic interests and voluntarily assumed social, corporate and environmental obligations.

For the Company, sustainable development means creating economic value and opportunities for society through fast, reliable and efficient delivery of cargo in containers and tax deductions, creating new jobs, comprehensive support for local communities in the regions of presence, respect for human rights, principles of open and honest business, minimizing adverse environmental impact.

In this regard, the Company imposes high requirements on its Suppliers regarding labor protection, environmental safety, social responsibility, business ethics and expects Suppliers to share and strive to comply with the basic principles of sustainable development in order to create a sustainable supply chain.

This Code makes Suppliers aware of the Company’s requirements for Suppliers in the course of business relations with them.

This Code is applied in conjunction with the Code of Business Conduct of PJSC TransContainer, the Anti-Fraud and Corruption Policy of PJSC TransContainer, the Environmental Policy of PJSC TransContainer, as well as other internal regulations of the Company, which can be found on the Company’s official website on the Internet ([www.trcont.com](http://www.trcont.com)).

### **2. Code Application**

This Code applies when the Company interacts with Suppliers that are currently doing business with the Company or intend to form business relations with the Company in the future.

When concluding contracts for the supply of goods, performance of work, provision of services, the Company offers Suppliers to acknowledge the acceptance of the principles reflected in this Code.

The Company expects all its Suppliers to apply the principles of sustainable development in their cooperation with their suppliers, contractors and partners.

The Company expects its Suppliers to support, adopt and enforce their own standards based on:  
compliance with the requirements of the laws of the Russian Federation and the principles set forth in the Universal Declaration of Human Rights, the Declaration of the International Labor Organization and the UN Global Compact;

ensuring transparency, openness and honesty in doing business and business relations;  
observance in their activities of ethical, anti-corruption, environmental principles, principles of labor protection and respect for human rights;

building a corporate management system taking into account the principles of sustainable development, regular performance assessment and taking actions for continuous process improvement.

When selecting Suppliers, the Company shall, among other factors, give preference to those Suppliers that demonstrate a desire to comply with the principles of sustainable development.

### **3. Business Ethics and Anti-Corruption Efforts**

The Company expects Suppliers to comply with the principles of ethical and honest business conduct and make efforts to combat corrupt practices, including:

- to comply with the applicable laws and common standards when fulfilling their obligations under contracts concluded with the Company;
- to adopt a zero-tolerance policy on corporate fraud and corruption, including bribery, commercial bribery and other corrupt practices;
- to prevent any types of money laundering offences;
- to involve its employees in and inform them about measures to prevent corruption and corporate fraud;
- to refrain from actions or inactions that give rise to conflicts of interest in the course of interaction with the Company;
- to comply with the principles of fair competition in accordance with the applicable antimonopoly laws;
- to timely inform the Company about financial, legal and other difficulties that may result in default on concluded agreements;
- to respect privacy, protect confidential and personal information of its employees and business partners, protect intellectual property from abuse.

### **4. Human Rights and Working Conditions**

The Company expects Suppliers to observe human rights and freedoms towards their employees, as well as any third parties, and to follow the principles of:

- compliance with the requirements of the applicable laws regarding protection of human rights and freedoms and the rights of local communities in the regions of presence;
- respect for the honor and human dignity of their employees, as well as third parties;
- prevention of inhuman treatment of employees, including any form of physical and sexual violence, verbal abuse, harassment and other forms of oppression.

The Company shares the principles of social partnership in relations with employees and expects Suppliers to provide decent working conditions for their employees, comply with obligations regarding development, training, social support and encouragement of their employees, including:

- to prevent the use of child, forced, slave and involuntary labor;
- to provide equal opportunity and equal labor conditions without any discrimination based on race, gender, skin color, nationality, religion, political views and other discriminatory grounds, promote the socio-cultural diversity of personnel;
- to recognize the right of employees to freedom of association and assembly, collective bargaining in accordance with the applicable laws;
- to avoid obstacles to the exercise by employees of their labor rights and freedoms;
- to apply fair and reasonable conditions of employment and remuneration, including the duration of working time and rest time, the amount of remuneration in accordance with the applicable laws;
- to bring out the best in personnel, including through the continuous development of employees, creating conditions for career and professional growth.

The Company expects Suppliers to strictly abide by the norms of international law and national laws regarding protection of human rights and freedoms and enforce those statutory provisions that provide employees and other third parties with the highest degree of social protection.

### **5. Occupational Health and Safety**

The Company expects from Suppliers a responsible attitude to the safety of their business processes and labor protection in order to ensure the safety and health of their employees. In particular, Suppliers shall:

- ensure safe working conditions that comply with standards and the requirements of the applicable

laws;

- observe the principle of priority of employee life and health protection during labor activities;
- involve management and employees in the safety and health management;

- take measures to improve working conditions, labor protection and reduce levels of occupational risks;

- ensure transparency in labor protection efforts;

- comply with the labor protection, industrial and fire safety requirements when performing agreements concluded with the Company.

## **6. Business Environmental Responsibility**

The Company expects Suppliers to strive to protect and preserve the environment, to comply with the principles of environmental responsibility of business in their activities, including the following:

- to comply with the requirements of the applicable laws and follow recommendations, international conventions, best practices and standards regarding environmental conservation;

- to take into account environmental concerns and assess the possible adverse impact on the environment when making their own managerial decisions;

- to reduce adverse environmental impact as low as reasonably practicable, implement responsible resource consumption and increase responsibility for the state of the environment;

- to carry out continuous monitoring, analysis and assessment of significant environmental aspects of their activities;

- to develop, implement and distribute environmentally sound technologies and best practices in environmental impact management;

- to cooperate with the Company to identify and implement measures for the environmentally sound and sustainable development of the entire supply chain.

## **7. Final Provisions**

Any parties concerned may contact the Company with questions on compliance with this Code, as well as provide the Company with information relevant to compliance with this Code by e-mail: [procurement@trcont.ru](mailto:procurement@trcont.ru).

The Company will interact with its Suppliers in order to understand the compliance of the Suppliers' activities with the principles set forth in this Code.

The Company may request from its Suppliers the information necessary to confirm that the Suppliers carry out their activities taking into account the principles of sustainable development reflected in this Code.

If the Suppliers do not provide the relevant information, the Company reserves the right to refuse further interaction or not to enter into contractual relations with the Suppliers.

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