

Code Of Conduct

For Suppliers

We are
the Baltic
Hub

Abstract geometric lines and dots in white and teal on a dark background. A horizontal white line spans the width of the page. A teal line starts from a teal dot in the upper right, descends diagonally, and meets the horizontal line. From that intersection, two white lines branch out diagonally downwards to the right. There are also small white dots at the intersection of the teal line and the horizontal line, and at the end of the horizontal line.

Business principles

CODE OF CONDUCT FOR SUPPLIERS

As a provider of cargo solutions and trusted partner to cargo stakeholders, Baltic Hub plays a crucial role in enabling the seamless flow of goods around the world and in co-creating the shift towards sustainable trade.

Baltic Hub is committed to conduct business with the highest standards of ethics and integrity, with accountability to customers, our people and the unions that represent them, our partners, governments, the local communities and the environment.

Baltic Hub seeks to ensure that every Supplier reflects and reinforces our commitment to the highest standards of excellence and are guided by the Code of Business Ethics and Conduct applicable at Baltic Hub. The following Supplier Code of Conduct (the “Supplier Code of Conduct”) describes in detail the expectations of Baltic Hub and shared commitment to ethical performance helping to improve the reputation of both Baltic Hub and the supplier.



1

Applicability

CODE OF CONDUCT FOR SUPPLIERS

The Supplier Code Of Conduct applies to third parties doing business with any work establishments, subsidiaries, divisions, affiliates, operating entities, authorised agents and/or subcontractors of Baltic Hub.

The Supplier Code of Conduct defines how business should be conducted and sets out guidance on the standards of behaviour expected of all suppliers, vendors, contractors, manufacturers, service providers, and business partners of Baltic Hub, along with their subsidiaries, affiliates, sub-contractors, sub-suppliers, agents and recruitment agencies (jointly “Supplier or “Suppliers”). At a minimum, Baltic Hub requires that all Suppliers meet the standards defined in the Supplier Code of Conduct.

Under the Supplier Code of Conduct, all Suppliers shall comply with applicable laws and regulations, act in accordance with the highest standards of ethical, personal and professional conduct and always observe properly incurred obligations. No Supplier may engage in improper behaviour or any conduct that would bring Baltic Hub into disrepute.

The Supplier Code of Conduct is not intended to be exhaustive in covering the issues or situations a Supplier may face; neither does it replace contractual terms, or more detailed policies and guidelines addressing more specific obligations related to a Supplier's business. Baltic Hub recognises and respects regional and local legal differences and other applicable laws and regulations.



„Baltic Hub seeks to ensure
that every Supplier reflects
and reinforces
our commitment
to the highest standards of excellence
and is guided
by the Code of Business Ethics
and Conduct
applicable at Baltic Hub.”

The Baltic Hub's Code of Conduct for Suppliers
was created based on and in accordance with the Code PSA International Pte Ltd.

Bribery and corruption

CODE OF CONDUCT FOR SUPPLIERS

Baltic Hub complies with all applicable [anti-corruption and anti-bribery laws and regulations applicable](#) in the countries where it operates.

In particular, Suppliers shall:

- Never, directly or indirectly, offer or make any unauthorised, illegal or improper payments on behalf of Baltic Hub;
- Never, directly or indirectly, attempt to induce anyone to do anything illegal or improper;
- Ensure appropriate channels are in place to report any knowledge or suspicion of unauthorised, illegal or improper payments being offered or received;
- Not, directly or indirectly, offer, promise or accept any type of bribe, kickback, payoff or inappropriate gratification or advantage (whether in cash or in any other form) to or from any person with the intention of influencing or inducing the person to assist Baltic Hub / to act on behalf of Baltic Hub in obtaining or retaining business or gaining any unfair advantage for Baltic Hub..



Bribery and corruption

CODE OF CONDUCT FOR SUPPLIERS

Suppliers are also expected to ensure appropriate policies are in place. Gifts, favours and entertainment are to be handled with caution and in line with any applicable laws.

Business gifts, favours or entertainment may be provided to Baltic Hub employees only if they:

- Are consistent with generally accepted business practice and ethical standards;
- Are not intended to, nor appear to, influence a business decision or gain a business advantage,
- Are not given with the expectation of any benefit or favour to be created or obtained;
- [Are transparent and not concealed](#);
- Do not violate the laws, regulations or policies of any country, public body or company involved; and
- Do not cause Baltic Hub to be embarrassed by its disclosure.

Baltic Hub takes a severe view of bribery and will take all necessary legal actions and other sanctions in response to any untoward conduct and/or infringement of the Supplier Code of Conduct, including, but not limited to, termination of a Supplier's Service.



Anti-money laundering

CODE OF CONDUCT FOR SUPPLIERS

Baltic Hub fully complies with all applicable anti-money laundering laws. Money laundering is the process by which funds from illegal activities (such as from illegitimate gambling or drug trafficking) are transformed into legitimate assets. Baltic Hub will conduct business only with customers or entities that carry out legitimate activities, with legitimately sourced funds.

Baltic Hub will conduct business only with customers or entities that carry out legitimate activities, with legitimately sourced funds. Baltic Hub will conduct business only with customers or entities that carry out legitimate activities, with legitimately sourced funds.



Sanctions Laws

CODE OF CONDUCT FOR SUPPLIERS

Baltic Hub fully complies with all applicable sanctions laws and expects that all suppliers it cooperates with adhere to and comply with all applicable sanctions laws and understand each sanctions law applicable to their relationship with Baltic Hub.

Consequences of non-compliance with applicable sanctions laws are serious and may include imprisonment, substantial fines for the entity and/or the individual, reputational harm, and potentially restrict the ability of Baltic Hub to continue provision of services to Baltic Hub customers or partners or to bid for or undertake new projects.

In the event of any breach or suspected breach of sanctions laws by any Supplier, the Supplier shall be obliged to immediately notify Baltic Hub in accordance with the contract concluded between Baltic Hub and the Supplier. Baltic Hub takes a severe view of breaching sanctions laws and will take all necessary legal actions in response to any infringement or breach, including, but not limited to, termination of a Supplier's service.



Health and Safety

CODE OF CONDUCT FOR SUPPLIERS

Baltic Hub complies with all applicable industry regulations and has a systematic approach both to prevent any safety breaches and **to promote a culture of safety. Health and safety are critical business issues that require regular reporting, appraisals and improvements.**

Baltic Hub does not tolerate any verbal or physical behaviour that may lead to or cause workplace violence and expects Suppliers to behave appropriately. The expectations of Baltic Hub, our customers and our stakeholders require that each employee works free from the influence of any substance or activity that could prevent or impede safe and effective work activities. The use, possession, distribution, purchase or sale of alcohol or drugs (excluding medicine) by any person while staying on Baltic Hub premises, or while operating Baltic Hub company equipment, is prohibited.

Any person under the influence of alcohol or drugs is prohibited from entering Baltic Hub premises, engaging in Baltic Hub business or operating Baltic Hub equipment.

To get more detailed information, see the health and safety guidelines set by the Health and Safety Service at Baltic Hub.



Child Labour

CODE OF CONDUCT FOR SUPPLIERS

Baltic Hub's suppliers undertake to apply the relevant regulations with regard to **safeguarding the rights of children and young people against economic and social exploitation.**

It is not permissible to employ children below the minimum age for employment or the age of completion of compulsory education in the country concerned, whichever is higher.

Suppliers also undertake not to employ children in work that is harmful or dangerous and that may endanger their health and/or morals, or that may interfere with their proper development.

It is permissible to employ juveniles only for the purpose of vocational training, upon presentation of a medical certificate stating that work of the type in question does not endanger their health.

The supplier is obliged to provide young workers with the care and assistance necessary for the proper performance of the work.



Forced labour

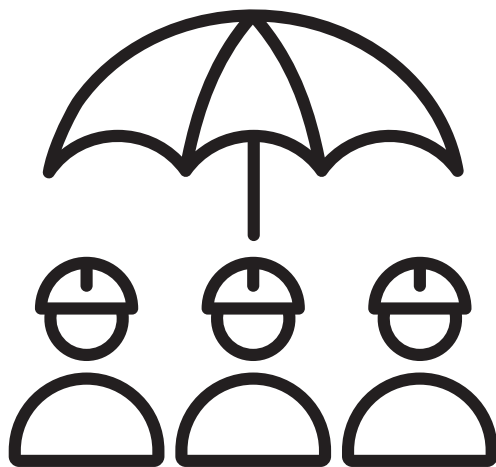
CODE OF CONDUCT FOR SUPPLIERS

The supplier shall not procure with its own efforts or use any form of forced, bonded or compulsory labour.

For the purposes of Baltic Hub, forced labour means any work or services required of an employee under threat of punishment, coercion and other means of influence (direct and indirect), which the employee has not consented to and to which the employee has not volunteered.

The Supplier will at all times have a written policy with regard to the issue of forced labour and will ensure its effective implementation in its organisation.

In particular, the Supplier will establish and implement appropriate systems to ensure that no form of forced, bonded or compulsory labour is used within the Supplier's operations and its supply chain. All work must be voluntary and Employees should be given the opportunity to resign upon reasonable notice.



Environment

CODE OF CONDUCT FOR SUPPLIERS

Baltic Hub strongly believes in long-term sustainable development and environmental protection. Baltic Hub **fully complies with all applicable local environmental laws and regulations.**

This commitment to environmental protection is reflected in our policies, programmes and practices to ensure that business activity is conducted in an environmentally and economically responsible manner.

Investment decisions and decisions regarding the Suppliers Baltic Hub works with will only be considered after reviewing all relevant feedback and assurance that environmental issues are properly addressed and managed.



Confidential information

CODE OF CONDUCT FOR SUPPLIERS

Any information not officially released to the public by the baltic hub marketing and communications department shall be deemed as confidential information, unless indicated otherwise.

Confidential information may only be disclosed outside of Baltic Hub by authorised Baltic Hub employees. The use or disclosure of any information about Baltic Hub is strictly prohibited and may constitute a criminal offence.

The non-disclosure obligation shall not apply when and to the extent that the relevant judicial, regulatory, governmental or administrative authorities request disclosure of such information.



Cyber and data security

CODE OF CONDUCT FOR SUPPLIERS

Baltic Hub implements and complies with internal cyber security policies in conjunction with relevant regulatory requirements, industry standards and best practices to protect the Baltic Hub information infrastructure against evolving cyber threats.

Suppliers shall ensure that they apply adequate controls to guarantee confidentiality, integrity and availability of information they store or process.

Baltic Hub expects all Suppliers to have appropriate up-to-date processes and security protection measures in place to prevent, limit and mitigate cybersecurity threats and breaches, to ensure that the Baltic Hub systems, infrastructure and data are not compromised.



Fair Trade

CODE OF CONDUCT FOR SUPPLIERS

Baltic Hub expects its suppliers to comply with all anti-trust and fair-trading laws in the jurisdictions in which the suppliers operate.

Suppliers shall refrain from any discussion, communication, information sharing, or agreement related to strategic information that would violate applicable anti-trust or competition laws.



Conflict of interests

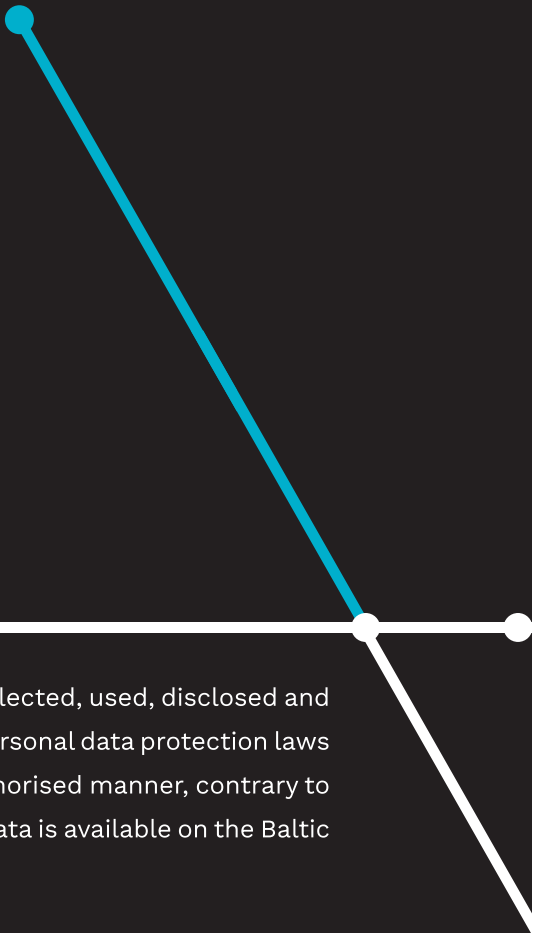
CODE OF CONDUCT FOR SUPPLIERS

Suppliers shall avoid any actual or potential conflict of interest in any undertaking, irrespective of whether or not the contract could be in the best interest of Baltic Hub.

Suppliers shall disclose whether a potential or actual conflict of interest exists. Failure to do so may indicate an attempt to unduly influence Baltic Hub or the tender evaluation process, and may lead to disqualification and potential exclusion from future tenders or termination of a Supplier's service.



Personal Data Protection Policy



In countries where there are laws governing how personal data should be collected, used, disclosed and erased or deleted, Baltic Hub expects Suppliers to adhere to all applicable personal data protection laws and to ensure that information is not disclosed in an inappropriate or unauthorised manner, contrary to applicable laws and regulations. Information on the processing of personal data is available on the Baltic Hub website:

<https://dctgdansk.pl/strefa-klienta/polityka-prywatnosci/>

Fraud

CODE OF CONDUCT FOR SUPPLIERS

Baltic Hub shall not tolerate fraud by suppliers. All suppliers shall therefore ensure they have appropriate controls in place. In the event of detecting a fraud that involves any transaction with Baltic Hub, the supplier shall notify Baltic Hub.

Where a serious allegation of fraud, corruption or bribery has occurred, Baltic Hub shall notify and fully cooperate with the appropriate law enforcement agency in any investigation. Where necessary, Baltic Hub shall take appropriate actions, including termination of the Supplier's contract or service.



Social Media

CODE OF CONDUCT FOR SUPPLIERS

If Baltic Hub notices any inappropriate, false or negative comments, pictures, video and/or audio content online about Baltic Hub posted by a supplier, [Baltic Hub reserves the right to request such supplier to remove postings which are deemed negative or damaging to Baltic Hub.](#)



Whistleblowing

CODE OF CONDUCT FOR SUPPLIERS

Suppliers shall ensure they have appropriate processes in place for their employees to report their concerns regarding breaches of laws or inappropriate behaviour.



Supplier acknowledgement

CODE OF CONDUCT FOR SUPPLIERS

The Supplier shall ensure that the Supplier has read the Supplier Code of Conduct and agrees that all of its work establishments, subsidiaries, divisions, affiliates, operating entities, sub-suppliers, authorised agents and/or subcontractors doing business with Baltic Hub comply with the Supplier Code of Conduct.

Failure by the Supplier to comply with any part of the contractual terms, or the Supplier Code of Conduct may result in cancellation by Baltic Hub of existing orders and termination of its business relationship with the Supplier.

The Supplier also understands that complying with the Supplier Code of Conduct does not oblige Baltic Hub to conduct business or place any orders with Supplier.





Baltic Hub Container Terminal Sp. z o.o.

2023