

CODE OF CONDUCT FOR BUSSINES PARTNERS

1. Purpose

This Code of Conduct for Business partners outlines Express Heroes, UAB (hereinafter referred to as “Express Heroes”) requirements and guiding principles for our business partners, in the area of compliance with applicable laws and regulations, in particular with regards to: basic working conditions, human rights, caring for the environment and business integrity.

The term *business partners* covers anyone that “Express Heroes” does business with, for example, organizations that supply goods and/or services to “Express Heroes”.

2. Basic Principles

This Code of Conduct is based on internationally proclaimed human rights, including the International Bill of Human Rights, the eight core conventions of the International Labour Organization and Article 32 of the UN Convention on the rights of the Child. In addition to this, “Express Heroes” also supports the United Nations Global Compact initiative which is a strategic policy initiative for businesses that are committed to aligning with ten universally accepted principles for human rights, labour, environment and anti-corruption.

3. Our expectations of Our Business Partners

At “Express Heroes” we are committed to responsible business, wherever we operate, and we rely on the same level of commitment from our business partners. We insist that our business partners not only communicate the principles of this Code of Conduct to their employees, but also ensure that their employees respect them. In doing so, we are seeking to ensure that everyone associated with “Express Heroes” demonstrates integrity, responsibility and trust.

As our business partner, you and your employees must – at all times - comply with this Code of Conduct or similar principles, with all applicable laws and regulations and, needless to say, with your contractual obligations to “Express Heroes”. The stricter regulation shall always apply if a topic is covered by this Code of Conduct as well as by applicable laws and/or your contract with “Express Heroes”.

We expect all of our business partners to meet all of the following basic requirements, and we expect them to be managed professionally and systematically.

4. Basic Working Conditions and Human Rights

We strongly believe that employees are a company’s most important resource. Which is why we insist that our business partners respect and work in line with internationally proclaimed principles for human rights.

5. Child Labour

Business partners shall work to prevent all forms of child labour. Under no circumstances should employment be offered to a person younger than 15 years of age (or 14 where the national law so allows) or younger than the countries legal minimum age, if higher than 15.

6. Terms of Employment

Our business partners must guarantee that the working conditions for their employees comply with all applicable legal requirements. In addition, each employee should have the right to get written information, in a language that they can easily understand, specifying their terms of employment

7. Working Hours

Working hours including but not limited to overtime, and requirements for providing rest periods, for business partner employees must always comply with applicable law. “Express Heroes” supports the requirements of the International Labour Organization (ILO) and we encourage our business partners to adhere to and respect the relevant ILO standards on working time.

8. Occupational Health and Safety

Safety should always be one of the most important factors in any decision, which is why we expect our business partners to provide and maintain a safe and healthy working environment that at least meets, but preferably exceeds, applicable standards and legal requirements.

9. Forced Labour

There can be no forced labour of any kind relating to “Express Heroes”, our services. Therefore, in no event may our business partner use forced labour, regardless of its form. Forced labour includes debt bondage, trafficking and other forms of modern slavery.

10. Wages and Benefits

Our business partners may not pay their employees wages and benefits less than is required by applicable law or collective labour agreement, where applicable. Information about wages and benefits must be available to all employees, in accordance with applicable laws.

11. Freedom of Association

Business partners shall respect the rights of their employees to lawfully form, join or exclude themselves from employer-employee relationship related associations and collective bargaining, where permissible by local law. We encourage our business partners to ensure that employees are given the opportunity to discuss their working conditions with management, without fear of reprisal, intimidation or harassment.

12. Non-Discrimination and Equal Opportunities

Our business partners may not engage in any form of discrimination based on gender, race, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background and/or other characteristics where protected by applicable law. Business partners are expected to treat their employees with respect, dignity and common courtesy.

13. Caring for the Environment

We expect our business partners to continuously seek to reduce the environmental impact of their activities, including the management of raw materials, just as we do. We also expect our business partners to continue to follow our mission and vision as set out in the Express Heroes, UAB Environmental Policy and to apply all precautionary principles. We keep in mind that precautions should be taken whenever there is reason to believe that a particular action may have a negative impact on the health of an individual, the general public or the environment. Our business partners must ensure that they comply with all applicable environmental requirements set out in laws, rules and regulations.

14. Business Integrity

We expect our business partners to conduct their business ethically and with the utmost integrity.

15. Anti-Corruption

None of our business partner, their employees may ever engage in, or tolerate, any form of bribery or corruption. As our business partner, you may neither offer nor accept any form of improper benefit to/from a third party including “Express Heroes”, whether public or private, with the purpose of obtaining or retaining business or in order to gain preferential treatment. Such improper benefits may include, but not limited to, monetary gifts, monetary loans, pleasure trips or vacations, luxury goods, concealed commissions, facilitation payments or kickbacks. We also expect our business partners to ensure that all of their reports, records and invoices are accurate and complete, and that they contain no false or misleading information.

16. Conflict of Interest

We expect our business partners to disclose to us whenever a situation arises in which there appears to be a conflict of interest involving or affecting “Express Heroes”. In a similar vein, we expect any employee or other representative of “Express Heroes” to disclose to us if they have any involvement in, or financial ties with, any of our business partners.

17. Export Control and Sanctions

“Express Heroes” is committed to fully comply with applicable export control laws and regulations including sanctions principles and commitments to comply with international economic sanctions requirements implemented in the jurisdictions where the Company operates. and we expect our business partners to do the same.

18. Fair Competition

Our business partners must support fair business and fully comply with all applicable fair trade, advertising, competition and antitrust laws. We expect our business partners to compete fairly and to never entering into any understanding or agreements that hinder competition. Accordingly, this means that as a business partner you should not undertake in any way with any competitor to: fix prices, discounts or terms of sale; or divide markets, market shares, customers or territories. We also expect our business partners to not competitively exchange confidential or sensitive information, even if it is made via third parties. Sensitive information include things like prices, timing of price changes, magnitude of price changes, costs, profit margins, sales forecasts, sales plans, sales territories, distribution practices, terms offered to particular customers, capacity utilization and intentions, competitive bidding plans or strategy, pricing and marketing strategies, product plans and market shares. This also applies when participating in fairs or trade association meetings.

19. Data protection and intellectual property

Business partners shall respect company's intellectual property rights and data protection confidential information by safeguarding it against misuse, theft, fraud or improper disclosure at least as declared at Regulation (eu) 2016/679 of the european parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

20. Whistleblowing and protection against retaliation

Reporting the complaints, whistleblowing procedures must be covered by partners on internal practices and also extended to interactions with external suppliers. Investigation of concerns related to suppliers helps to ensure that ethical standards and legal requirements are upheld throughout the supply chain. Retaliation protection is a critical component of any whistleblowing procedure. To ensure that individuals who report unethical or illegal activities do not face adverse consequences as a result of their actions.

21. Consequences of Violating This Code of Conduct

We reserve the right to conduct an audit, at any time, of business partners that provide goods or services to "Express Heroes". Advance written notice will be provided. If requested, our business partners are obligated to provide all relevant information and/or allow us or our representatives access to their premises for the purpose of the audit. We also reserve the right to appoint an independent third party of our choosing to conduct audits and ensure our business partners are following this Code of Conduct. Lack of cooperation and/or violation of our Code of Conduct and/or applicable laws may result in a reduction in business with that partner and, ultimately, an end to the business relationship with "Express Heroes".

22. Tell Us

At "Express Heroes" we encourage our business partners to ask questions and raise concerns, in the event of an ethical issue or suspected case of non-compliance. These concerns will be treated with the gravity they deserve and will be properly investigated. If you wish to report a violation of our Code of Conduct, please submit a report to us by any means of communication suitable for you.