



Raben

*your partner
in logistics*



**Ethical Rules
of Raben Group
Employees**

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Raben Group's Ethics Commission

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Katarzyna Ostojaska, Raben Group Marketing Department

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Preamble

Employees and Subcontractors of Raben Group are guided by common values which are like individual tones of a melody. However, writing out the tones is not enough for music to sound perfect. What you also need is proper time. In order to specify behaviors which are consistent with company signposts, ethical rules have been formulated.

Behaviors defined by the law are the minimum, just like notes which represent tones. Behaviors which go beyond the aforementioned minimum are the time and consonance which complement the composition.

The rules expressed in writing work for the benefit of the company as well as its Employees and Subcontractors.

Defining the ethical horizon and establishing the Ethics Committee exemplifies the social responsibility of Raben Group which undertakes a dialogue with the environment in order to improve its operations and promote fair and reliable behaviors towards all stakeholders.

We must be aware that each and every one of us is responsible for fulfilling the written standards in front of other Raben Group Employees, Customers and Subcontractors.

This document contains the Ethical Rules of Raben Group and information about the communication channels which one can use to voice doubts or deviations from the aforementioned rules.




We create and act according to highest standards

Raben Group has the obligation to guarantee responsible cooperation which respects the rights of individuals. Dialogue is the key tool of cooperation in Raben Group. Therefore, Raben Group shall not:

- use indentured or forced labour (including forced labour of convicts),
- use child labour.

Raben Group guarantees:

- freedom of association and the right to collective bargaining for the conditions of employment,
- appropriate working time compliant with local regulations.

A close-up photograph of several green leaves, likely from a plant like a basil or similar herb, covered in numerous clear water droplets. The leaves are vibrant green and show prominent veins. The background is dark, making the green leaves and white droplets stand out.

*“Somebody once said that in looking for people to hire, you look for three qualities: **INTEGRITY**, intelligence, and energy. And if you don’t have the first, the other two will kill you.”*

Warren Buffett



Honesty and integrity control our actions

Reliability determines fair and ethical behaviors. Promoting ethical business behaviors, we pay special attention to the ethics of accepting gifts from Customers, Partners and Cooperators. This rule works both ways.

Material and intangible personal profits resulting from work in Raben Group, such as using one's status, function or position in order to obtain preferential conditions for one's personal gain are forbidden.

Selection of a service or product is determined by their quality, competitiveness, as well as the reliability and responsibility of the tenderer.



"I have often noticed that a bribe has that effect – it changes a relation. The man who offers a bribe gives away a little of his own importance; the bribe once accepted, he becomes the inferior (...)."

Graham Greene

Preventing corruption

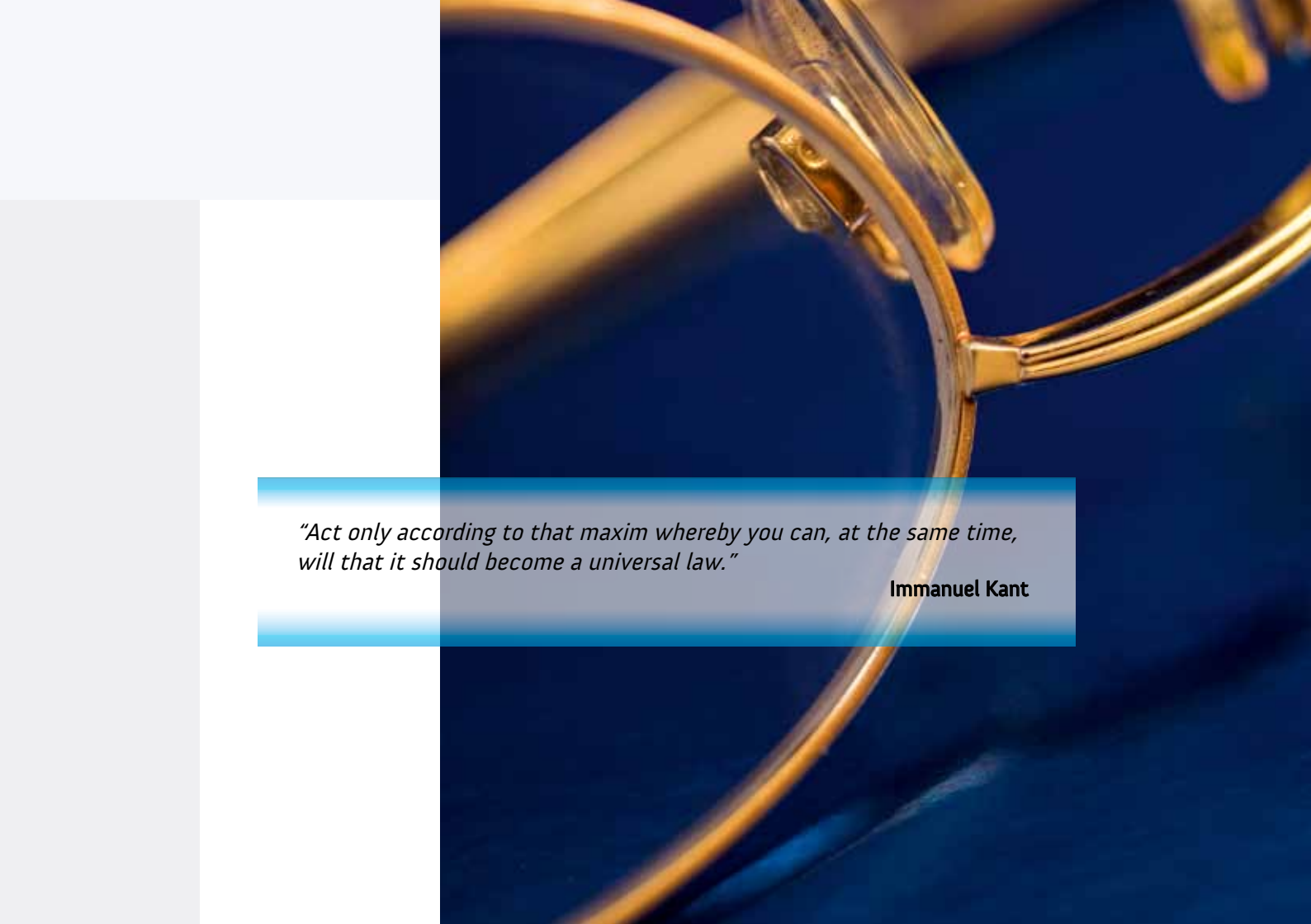
Corruption is a threat to fair competition and it damages Raben Group's operations as well as its image.

Raben Group abides by all legal regulations pertaining to preventing corruption. Raben Group's Employees, representatives or partners must not influence the current or prospective Customers or public officers in an unlawful way, in a manner contrary to good practices, by preferential treatment, nor by presenting gifts or any other personal gains.

Public officers are in particular:

- persons holding posts in state authorities or candidates for such posts;
- public administration officials (state or local);
- members of Parliament and councillors of local government bodies of all levels, as well as persons running for such posts;
- members of the European Parliament;
- judges, jurors, district attorneys;
- persons holding managerial posts in state or international institutions;
- personnel of services appointed for maintaining state security;
- active military personnel;
- employees of state-owned companies;
- representatives of political parties or candidate for state offices, as well as close family members of the above-mentioned persons (e.g. a brother, sister, mother, father, husband, wife and children).






"Act only according to that maxim whereby you can, at the same time, will that it should become a universal law."

Immanuel Kant

Lawfulness

Raben conducts a business activity in full compliance with the binding law while following the principles of integrity and good business practices. The same is demanded by Raben Group from its Customers, their Employees and representatives.

A close-up photograph of a mechanical assembly featuring several brass gears of varying sizes. A prominent metal shaft with a threaded top section is positioned vertically, passing through one of the gears. The lighting is dramatic, highlighting the metallic textures and the intricate teeth of the gears. A semi-transparent text box is overlaid on the lower portion of the image.

*"Nothing astonishes men so much as **COMMON SENSE** and plain dealing."*

Ralph Waldo Emerson


We predict the consequences of our decisions and actions

We care for the health and safety of all persons involved in processes connected with operations of Raben Group. We make sure that persons employed by our company have adequate work conditions including:

- Safe work environment and process which are achieved through appropriate risk analysis of work processes which contains at least risk identification, preventive measures appropriate for the identified risks, the impact of risk and the mutual influences on all interested parties. We guarantee on our own and at our cost appropriate infrastructure and measures minimising risks of incidents at work and increasing safety.
- Adequate sanitary conditions – access to drinking water, appropriate hygienic conditions in rooms where meals are prepared, appropriate number of clean toilets and basins and, in case of providing Employees and Subcontractors with accommodation: adequate living quarters, safety, cleanliness, heating and ventilation,
- Adequate and safe infrastructure: vehicles, machines and devices used by Employees and Subcontractors and the infrastructure around them undergo regular maintenance and are equipped with appropriate safety measures which protect the Employees.

Additionally, we change processes, equipment and systems adequately to the progress of technology and the risk assessment of work processes.

Our Employees do not consume alcohol, psychotropic or abusive substances neither during work hours nor at the time which could make the effects of the aforementioned substances remain until the commencement of their professional duties.

A close-up photograph of four hands of different skin tones clasped together in a circle, resting on a surface of green grass. The hands are positioned in a way that suggests unity and support. The background is a soft-focus green lawn.

*"Friendship rises from many sources, the biggest of which is **RESPECT.**"*

Daniel Defoe



Respect one another

The strength of the group is its diversity. A multitude of experiences and perspectives is our advantage. Discrimination based on age, sex, religion, disability sexual preferences, skin color, marital status, pregnancy, parental status, political opinions, nationality, ethnic background or social status may destroy our distinctive characteristic.

Behaviors compliant with Reliability determine actions in accordance with professional ethics. Actions lacking respect for another person, using their lower position or defenselessness, such as mobbing, harassment, discrimination or unwanted behavior which results in affecting personal dignity of the aggrieved person, as well as behaviors which create intimidating, hostile, demeaning, humiliating or affronting atmosphere are not only against the law but also against the values which guide our Employees.

Various cultures which are at the foundation of the strength of Raben Group, however, share the common rules of etiquette which result from the respect for others.



*“Respect the truth so that your words are more **RELIABLE** than other people’s promises.”*

Socrates

We keep our promises

Keeping deadlines, agreements and payments is an evidence of our credibility. Keeping promises concerns both time and scope of agreements.

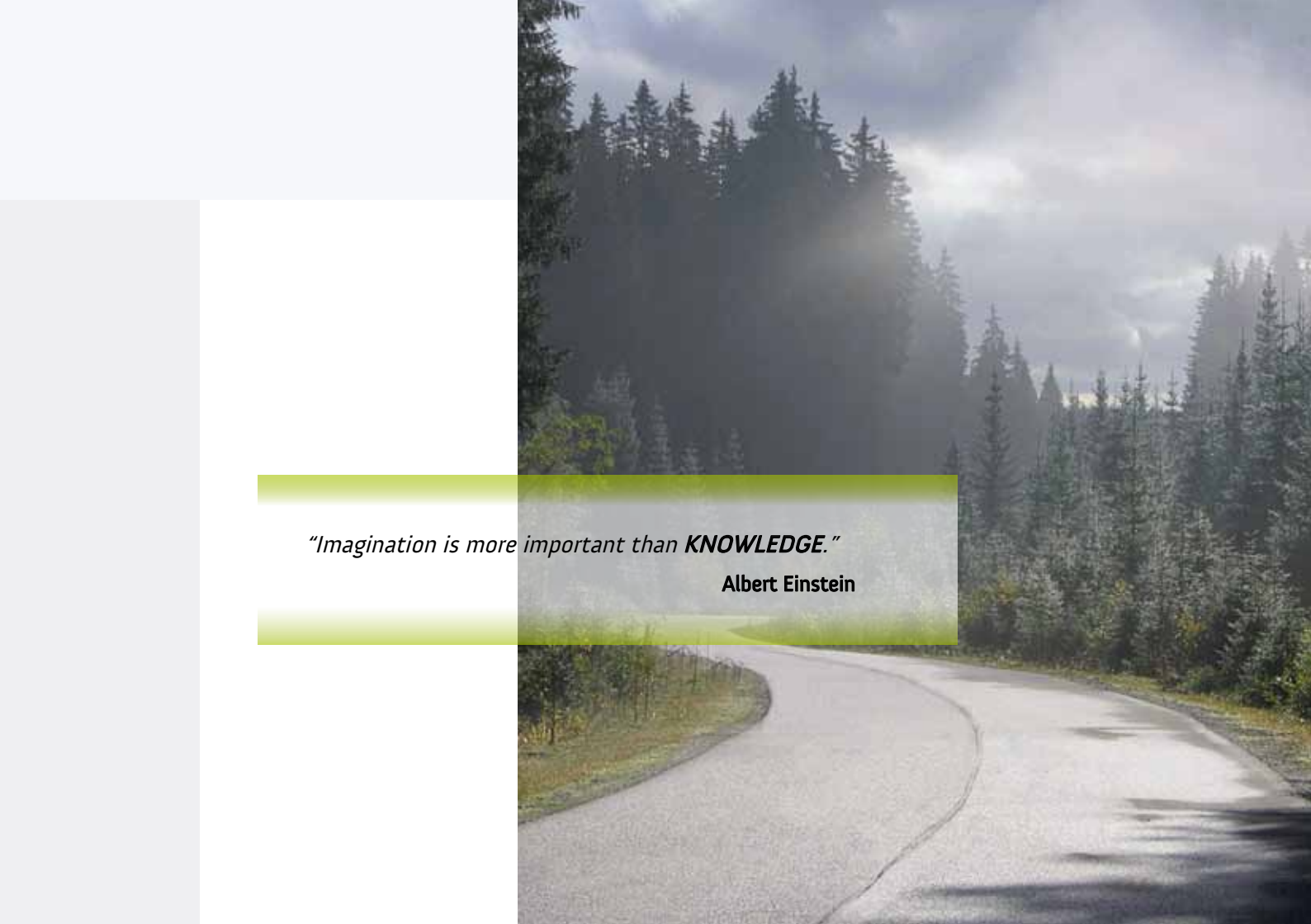
Confidentiality

The supplier and his subcontractors are obliged to use only to the benefit of the company the data gained due to work at Raben Group. The supplier is obliged to protect information being the ownership of the company, its customers, partners and companies cooperating with Raben Group.

Only selected persons are responsible for contact with the media and only they are authorised to speak on behalf of the company and give information about Raben Group.

Neutrality in the world of politics

We appreciate the diversity and multitude of opinions within Raben Group and we respect and approve political opinions of other Employees. Raben Group and Employees working on its behalf do not give direct or indirect support to political parties or individual politicians.



*"Imagination is more important than **KNOWLEDGE.**"*

Albert Einstein



In our branch we set trends which bring additional benefits to the environment through sustainable development

Ethical behaviour also refers to care for the environment which future generations will inherit from us. Therefore, our actions are aimed at protecting environment and saving resources.

In case the rules presented above do not solve your dilemmas, we suggest that, before you make a decision in a situation unclear from the ethical point of view, you should try to answer the following questions:

- Is this legal?
- Is this in breach of company policy?
- Is this in accordance with company values?
- Is this fair and transparent?
- How would I feel if I did this?
- What would my family think about this?
- What would newspapers write about this?
- Could I look at myself in the mirror after doing this?

If the behavior we see or action we want to undertake, despite answering these questions, still seems unclear, we encourage you to communicate your doubts to your:

- your immediate superior,
- the ethics committee,
- legal advisor.



*"Our span of life is brief, but is long enough for us to live well and **HONESTLY.**"*

Cicero

Ethics Commission

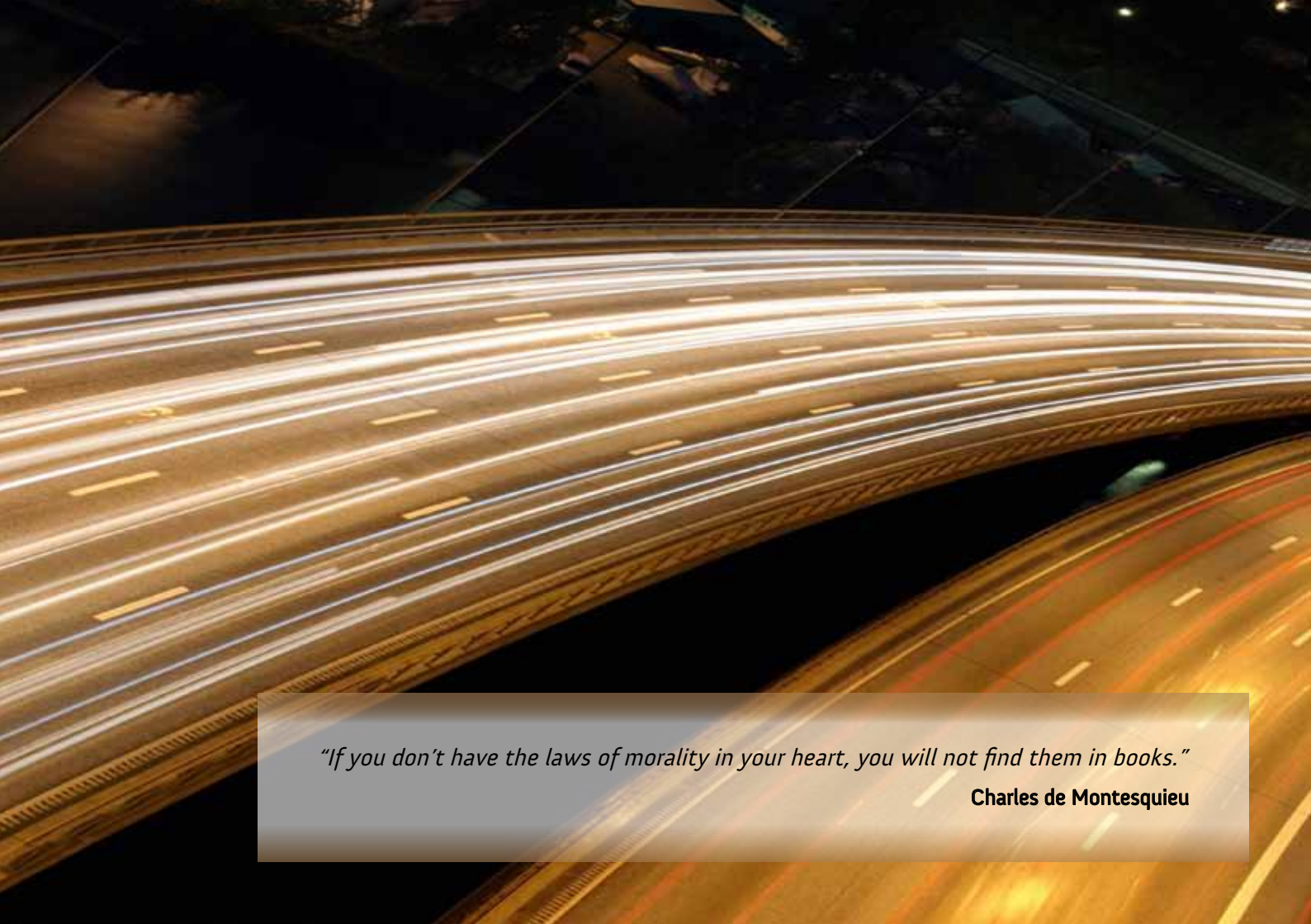
The Ethics Committee has been formed in order to examine applications and letters which are sent by Employees and Subcontractors of all companies in Raben Group. Its objective is to prevent unethical behaviors and abuse. After notification, a special procedure will be launched in order to investigate and explain any improprieties.

The Committee will convene no less than every three months.

Any materials and information presented to the Committee will be strictly confidential.

Raben Group reserves the right to modify the described rules so that they reflect the issues valid for the particular time and so they respond the submitted but previously not described cases.

1. Employees submit applications in a written form via post to the address: Komisja Etyki, ul. Zbożowa 1, 62-023 Robakowo, e-mail: ethics.commission@raben-group.com.
2. An Employee can describe their observation with providing their personal details (not anonymously). Only such applications will be investigated. The Ethics Committee guarantees anonymity.
3. All mobbing-related issues can be submitted anonymously.
4. Submitted applications can concern matters which occurred no more than 6 months before submitting the notification.
5. The Committee also answers questions concerning any planned action which an Employee may be concerned about. Each Raben Group Employee may submit such inquiry to one of the Committee members who is responsible for the appropriate company within Raben Group and the aforementioned member of the Committee is obligated to take a stance within seven days from the day of submitting the application.
6. The Ethics Committee considers submitted applications particularly in relation to the Values and Ethical Rules which supplement them.
7. The Ethics Committee will examine submitted applications together. Then, depending on the type of the matter, they will be transferred to the managers of the company within Raben Group which the application concerns unless the matter concerns the Employees themselves.
8. The Committee has an obligation to answer each signed applications within two months from the day of submitting the application to the address provided by the submitting person.



"If you don't have the laws of morality in your heart, you will not find them in books."

Charles de Montesquieu

**The rules described in
this code apply to all
Employees of Raben Group**





www.raben-group.com