

CODE OF CONDUCT

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AG TRANSPORT, s.r.o.

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AG TRANSPORT
Transport and Logistics

Our Mission

We shall contribute to the success of our customers, the prosperity of employees and communities, and the sustainability, growth

and profitability of our operations by reliably supplying high quality services.

Our Values

We seek to provide our customers and the consumers of their products with high quality products and services. We believe in continuous improvement and seek best practices to eliminate non-conformities. We know that our customers value innovation and flexibility and our open and proactive attitude. We strive to support the success of our customers and to treat the suppliers and business partners on whom we depend with fairness and transparency.

We, the employees, produce and supply the products customers require. We manage the business and all its processes. Quality, innovation, efficiency, and proactive attitudes are our responsibility. We strive to invest in employee development, provide a safe and comfortable work environment, support the health of employees and their families, and provide opportunities. We treat each other with respect and encourage transparency and communication.

We must comply with all applicable regulations – this is the starting point of our responsibility to society. We must not accept any forms of corruption or other illegal activity. We strive to create value for the countries and communities where we are present by paying taxes, creating jobs and protecting the environment. If we can deliver these values, then financial success will follow. We are focused on the long-term success and sustainability of our business, and want to invest our profits wisely. We will continue to invest in new markets, technologies, best practices and employee development so that we will continue to meet the expectations of our stakeholders in the future. The Purpose of the Code of Conduct is to give clarity about how we conduct our business globally to ensure that the excellent reputation of the Company and its employees are maintained in order for the company to continue its global growth strategy.

Object and Scope

This code of conduct is a guideline which applies to all the business activities of AG TRANSPORT and sets clear standards with regard to integrity and proper business

dealings. It is binding on all employees of AG TRANSPORT.

Employees are required to exercise their judgement responsibly with circumspection

and be guided by honesty, reliability and probity. No employee may misuse his position for personal advantage nor promote or tolerate behavior that does not accord with this code of conduct.

Advisors, representatives, dealers, suppliers and other individuals working on behalf of the AG TRANSPORT should also be required where possible to abide by this code of conduct.

Our Rules of Behavior

Business Ethics

Compliance with the law and basic principles of fairness

We are subject to many different laws and regulations and must all take great care to understand and comply. In addition, we must follow basic principles of fairness in all we do; fairness towards each other, our business partners, our neighbors, our competitors, and towards society as a whole. We also expect fair treatment and ethical behavior from our business partners in return. We place specific demands on suppliers as outlined in our Supplier Guidelines.

Every employee shall be required to comply with the statutory regulations of the jurisdiction within which he or she is operating. If in doubt, he or she should seek legal advice. This code of conduct deals below with legal and other areas which the AG TRANSPORT considers to be particularly important.

TRADE AND COMPETITION

Different countries enact legislation affecting how, where and with whom we can do business. Laws of different countries sometimes conflict with each other, and

changes frequently occur. Specific areas of trade legislation include:

- Fair competition
- Unfair business practices
- Import and export restrictions

The AG TRANSPORT legal department from time-to-time issues specific guidance to sales, marketing or procurement managers regarding these laws. In any given specific situation, it may be difficult to know how to best comply. When in doubt in specific situations, responsible employees should consult with the AG TRANSPORT internal legal counsel.

ANTI CORRUPTION

AG TRANSPORT does not tolerate any form of corruption.

Bribery, corruption and anti-competitive practices destroy markets and hinder economic, social and democratic development. AG TRANSPORT does not tolerate them and opposes any form of corruption, direct or indirect, bribery or other undue advantages for commercial or private gain, either for the company or others.

Corruption includes bribes and improper commercial influence. Corruption undermines legal business activities, distorts competition, destroys a company's reputation, and exposes companies and individuals to risk. Anti-corruption policy also includes facilitation payments. These are payments that are paid to government employees to speed up an administrative process where the outcome is already pre-determined. Facilitation payments are forbidden in most countries. AG TRANSPORT does not permit facilitation payments. AG TRANSPORT Personnel must not engage in bribery of any kind. It is not acceptable to promise or offer a bribe in any form to a local or foreign official; solicit, accept, promise or offer a bribe or kickback in any of AG TRANSPORT's business relations. AG TRANSPORT Personnel who have been asked for or offered a bribe must immediately inform their manager.

AG TRANSPORT employees must also beware of suppliers or other external parties seeking unfair advantage through corrupt means! Employees never may request or accept cash or valuable favors from AG TRANSPORT business partners, for themselves or for family members.

GIFTS AND ENTERTAINMENT

Gifts, entertainment and hospitality play an important role in business and private relations. The culture of gifts differs from country to country. In some areas rejecting a gift maybe offensive. On the other hand, excessive gifts, entertainment and hospitality may be used to seek an undue business advantage. AG TRANSPORT is aware that in building long-term business relationships

gifts, entertainment and hospitality can play a part. Giving or receiving gifts must always stay within reasonable limits. This is to ensure that AG TRANSPORT retains its reputation as being fully independent of its business partners, and can base its decisions on objective arguments. Gifts, entertainment and hospitality should always be legal and intended only to build a business relationship or offer normal courtesy, for instance, promotional items or occasional meals with business partners. Any gift of cash or a cash equivalent, any gift or entertainment that is offered for something in return, any entertainment that is potentially offensive, sexually oriented or discriminatory is always unacceptable.

CONFLICTS OF INTEREST

Employees should avoid situations in which personal interests conflict with the discharge of their duties within the AG TRANSPORT. Should such a conflict of interests occur, the employee must inform his or her superior.

In particular, employees are forbidden from acquiring an interest in competitors, suppliers or customers or acting on their account.

Personnel may not operate or assist a company that competes with AG TRANSPORT or engages in any competing activities. Personnel may not engage in sideline work which competes with AG TRANSPORT. Before Personnel engage in other sideline work, they must notify AG TRANSPORT and seek written permission. Permission may be refused if Personnel have dealings in the course of their official AG TRANSPORT's duties with the company in question. Previously granted permission may be revoked on these grounds as well.

Professional engagement in businesses outside AG TRANSPORT may represent a conflict of interest. If you plan to become a director or a board member of a company whose business is in any way related to that of AG TRANSPORT, you should get approval. Before taking any outside employment, you

should discuss it with your manager to make sure that conflict of interest will not arise. Employment, including consultancy, with companies in the same line of business as AG TRANSPORT, is not permitted for AG TRANSPORT personnel.

Personal Behavior, Labor Law and Human Rights

RESPONSIBILITY OF ALL EMPLOYEES

As employees of AG TRANSPORT, we must accept and follow the Code of Conduct. All employees, regardless of the nature of their work or the place in which it is carried out, shall be aware of the contents of the code of conduct and of the legal regulations which affect their work. Managers must ensure that all employees within their areas of responsibility receive necessary instruction, and must provide appropriate guidance to employees in applying the code to specific situations. Every employee should strive to ensure that their actions will be seen as a positive example and motivation for other employees to follow.

RESPECT FOR THE RIGHTS AND DIGNITY OF THE INDIVIDUAL

While at work we must conduct ourselves professionally and with respect for all people. From the most senior manager to the newest recruit, everyone contributes to the success of AG TRANSPORT by:

- respecting the rights, dignity and individualism of every individual
- speaking politely and with professional respect for others
- avoiding all forms of intimidation and harassment
- being personally accountable for our activities

As an employer, we must ensure that our activities fulfil the rights and needs of our employees, and are in compliance with laws governing labor relations, working hours, working conditions and remuneration. As AG TRANSPORT employees, we should ensure that our actions are compatible with AG TRANSPORT values. We should avoid any act or behavior that could damage AG TRANSPORT's reputation.

UNFAIR DISCRIMINATION

We must avoid any discrimination in human resources or everyday work practices on the basis of race, skin color, sex, religious affiliation, sexual orientation, political beliefs, age, state of health, or disability. We respect

cultural diversity and the variety of customs that it entails.

FORCED LABOR

We must not use and do not accept the use of forced labor, slave labor, unpaid labor, or human trafficking at any point along the supply chain. Our employees at any time may terminate their employment contracts, and retain the use of their own identification documents. AG TRANSPORT will avoid working with suppliers that are known for making use of forced labor in their operations.

EMPLOYMENT OF MINORS

We must not employ any person who has not reached the legal age for employment for the country where they are living. AG TRANSPORT in any country may not employ any person

who is not at least fifteen years old. For any employees below the age of 18, we must ensure that the type of work or number of hours worked does not interfere with their ability to receive an education.

FREEDOM OF ASSEMBLY

The management of AG TRANSPORT should strive for transparency and consultation with employees in issues which concern them. All employees have the right to represent their own interests with regards to employers to the full extent guaranteed by law, including the ability to form or join trade unions. The executive management of the AG TRANSPORT shall also strive for transparency and to provide information to employees about the activities of the group.

Occupational Health and Safety

Every country establishes regulations designed to protect the health and safety of employees and visitors. But even if there were no laws at all, to achieve our values we must ensure a safe and healthy workplace. Strict laws and external inspections are not a burden, but an opportunity for us to identify risks and improve safety procedures. Therefore, we shall strive to achieve group health and safety standards in every country, even if not required by law. It is the responsibility of management AG TRANSPORT to implement health and safety procedures.

In addition, management at AG TRANSPORT must ensure that a health and safety officer has been appointed and empowered to monitor procedures, systems and controls.

AG TRANSPORT health and safety officers have a functional reporting line to AG TRANSPORT headquarters, and are authorized to communicate directly with company headquarters on health and safety issues.

Management, with the support of their health and safety officers, are responsible for ensuring that all employees and visitors to AG TRANSPORT are adequately trained in safety procedures.

All employees are required to learn and apply the health and safety procedures designed to protect them and those around them.

As employees, we are responsible for:

- Understanding the risks associated with our work
- Understanding health and safety procedures in force where we work
- Applying required group and individual safety measures in the workplace
- Regularly taking part in training sessions to raise awareness and knowledge of dangers and appropriate countermeasures in the workplace
- Preventing accidents and near-accidents in the course of our work
- Reporting all potentially unsafe situations observed to management or health and safety officers
- Assisting and cooperating with persons carrying out inspections and during accident investigations

ACCIDENTS, THREATS, AND OCCUPATIONAL HEALTH AND SAFETY

It is our ambition to avoid accidents. If, however, a serious accident or near accident does occur, the immediate priorities are to safeguard individuals and neutralize any danger. Once these priorities are achieved, data related to the incident shall be safeguarded for analysis, so that the root

causes of the problem will be identified and addressed.

In an accident investigation the objective it is not to determine WHO made an error or is responsible, but rather WHY the error could occur.

Management, with the support of health and safety officers, is responsible for ensuring an efficient and smoothly functioning system for reporting and investigating all accidents, injuries, and potential accidents in the workplace, and for addressing the causes of accidents to prevent reoccurrence.

Management is responsible for ensuring that those procedures are maintained, improved where needed, and that employees are aware of and trained in the application of these procedures.

DRUGS, ZERO TOLERANCE FOR DRUGS AND ALCOHOL

AG TRANSPORT is a drug-free workplace. The possession, distribution, and use of illicit drugs, narcotics, and alcohol on the premises of the AG TRANSPORT and companies working with the AG TRANSPORT is prohibited. Nobody shall be under the influence of alcohol, drugs or other intoxicants while working for AG TRANSPORT.

Natural Environment and Social Responsibility

ENVIRONMENTAL MANAGEMENT

In every country where AG TRANSPORT is active, we are subject to environmental

legislation and regulations. However even in countries where legislation is weak or not enforced, we must recognize our responsibility to protect human health, the

natural environment and natural resources, and encourage our business partners to do the same. Manufacturing operations can potentially affect the environment in many ways, including noise emissions and air, soil, and water pollution. It is AG TRANSPORT's strategy to conduct our business activities with the use of modern technologies so as to minimize the impact of our activities on the natural environment. We must continue to search for innovative solutions to minimize our use of natural resources and limit and recycle waste materials which are produced in the course of our activities.

The management of AG TRANSPORT must ensure that an environmental protection officer has been appointed to monitor systems and controls designed to meet the local requirements, and actively engage in raising environmental awareness among employees and the community. AG TRANSPORT environmental protection officers have a functional reporting line to AG TRANSPORT headquarters, and are authorized to communicate directly with headquarters on environmental issues.

All employees must also do their part to ensure the systems and controls are working, follow agreed procedures and promptly report any potential problems.

USAGE OF ENERGY AND RESOURCES

AG TRANSPORT activities require energy and other scarce resources. It is part of AG TRANSPORT strategy to implement programs aimed at reducing our usage of energy and resources, both to reduce costs and to protect the environment. An example of this are programs to recover and re-use heat energy.

All employees are encouraged to make suggestions or take initiatives to reduce energy inefficiency. Every contribution helps, ensuring lights are turned off when not needed or avoiding unnecessary travel!

WASTE MANAGEMENT

AG TRANSPORT must follow legislation for labelling, monitoring, treatment and disposal of unsafe waste products and other substances. But even in jurisdictions where legislation and enforcement are weak, we must implement best practices to ensure that our manufacturing processes do not have a negative impact on those around us.

The management of AG TRANSPORT has primary responsibility to organize and monitor waste management procedures, and to spread awareness of potential problems and solutions to all employees and business partners.

All AG TRANSPORT employees should contribute to waste management efforts within their daily work by learning and following waste management procedures and watching out for and reporting potential problems.

USE OF CHEMICAL SUBSTANCES

Chemical substances used in repair service can create various kinds risks to the health and safety of employees and others. It is the responsibility of company management to design and implement procedures to address these risks during purchase, storage, transfer and use of the substances. The procedures must include ensuring that affected employees received appropriate training.

Company management must also ensure that suppliers, transporters, recyclers and any other business partners dealing with the substances also follow appropriate safety procedures.

All AG TRANSPORT employees are responsible for following authorized handling procedures and to be vigilant for detecting and reporting potential problems.

PRO-ECOLOGICAL ACTIVITIES

Our commitment to sustainability extends beyond our manufacturing processes. Recycling of used beverage cans and bottles is part of our business strategy and one way that we can make a positive impact on the ecology and society.

AG TRANSPORT will continue to explore pro-ecological activities, and we encourage all employees to contribute by supporting existing programs and suggesting new ones.

Confidentiality and Data Protection

CONFIDENTIALITY

AG TRANSPORT is required by law and by contract to maintain the confidentiality of information entrusted to us by employees, customers, suppliers and other business partners. In addition, in the conduct of our business AG TRANSPORT must also protect its own confidential information from unauthorized parties. Confidential information can include prices, sales volumes, rebates, payment dates, business plans, supplier pricing, marketing programs and goals, client lists, supplier lists, plans for mergers, acquisitions and divisions, changes in management, logins and passwords for IT systems, technological data including production data, know-how, IT data, the configuration and addressing of networks and servers, security and authorization methods applied, information regarding ongoing disputes including arbitration, court and administrative cases, legal decisions, and data concerning co-workers such as personal details or remuneration.

Through contractual agreement, AG TRANSPORT requires business partners to keep secret all confidential information passed on to them by the group, just as we protect their information.

Similarly, AG TRANSPORT employment contracts require employees to maintain the confidentiality of internal company information which they have access to in the course of their work. In case a AG TRANSPORT employee shall leave the company, they must return any AG TRANSPORT documents or files, including electronic files, which may be in their possession. Once they have returned all documents and files, the leaving employee must then permanently delete any electronic copies of AG TRANSPORT documents they may possess.

EQUIPMENT AND SYSTEMS

AG TRANSPORT provides employees with access to computers, printers, telephones, cell phones, tools and other equipment as needed for fulfilment of their work-related

responsibilities. Systems and equipment are provided for work purposes and are not intended for purposes unrelated to employment obligations. Any information stored by employees on AG TRANSPORT systems is the property of AG TRANSPORT and may be reviewed by authorized AG TRANSPORT personnel.

PROTECTION OF PERSONAL DATA

AG TRANSPORT is required by legislation in many countries to protect personal data of individuals in the possession of the company. Employees who are entrusted with the collection and maintenance of personal data must familiarize themselves with the applicable legal requirements and take steps to ensure compliance.

EXTERNAL COMMUNICATION

One of the most valuable assets of AG TRANSPORT is its reputation. When we employees together strive to achieve our company objectives and fulfil our values, we build and strengthen the reputation of the company.

While we must protect confidential information, we must also ensure that public information about AG TRANSPORT is effectively and accurately communicated, so that potential new customers, suppliers, employees, the general public and others with

a legitimate interest in our activities can see us clearly.

Employees who have been specifically authorized by management to speak or publish information on behalf of the company must fulfil this responsibility with integrity. We love to publish good news, but when the news is not good, we must not hide or misrepresent inconvenient facts. Other employees who are not authorized to speak or publish information on behalf of AG TRANSPORT should refer any requests for information to management.

ARCHIVING OF DOCUMENTS

AG TRANSPORT is legally required to archive and protect its records, sometimes for many years. AG TRANSPORT also needs to protect many kinds of information, including contractual records and technical data, from accidental loss. Most (but not all) of our records are stored in electronic form on our IT systems.

The management of AG TRANSPORT company shall establish specific rules for storage, back-up and archiving of company documentation and records, in accordance with local law and practical requirements.

Employees involved in this important work must perform such tasks diligently and proactively identify and address risks which could lead to loss of information.

Speak-UP!

The purpose of this Code is to provide an ethical framework for our activity. It is a

description of how we do things, the company culture; not as it is today exactly, but as we

would like it to be. Many AG TRANSPORT employees contributed ideas that were used to make this document.

What do we, the employees of AG TRANSPORT, want? We want AG TRANSPORT to be the best, most technologically advanced and innovative supplier in the market. We want long-term economic security and unlimited opportunity for employees. We want our company to be famous for its positive contribution to society. We want a friendly and safe working environment.

This document is not perfect and our organization is not perfect, but we will make it better by identifying the things that are wrong, and then fixing them. Do you see something in our activity, in the way we do things, that is inconsistent with this Code or needs fixing? Can you describe it? Can you suggest a solution? Here are some alternative ways to report concerns.

FIRST ALTERNATIVE:

For most questions, the natural thing is to discuss the matter with your direct

manager or supervisor. All managers and supervisors are required to listen to employee concerns, and look for the best solution according to the Code!

SECOND ALTERNATIVE:

There are times when an employee may feel uncomfortable in discussing the matter with his or her supervisor. Depending on the issue, you are always welcome to consult with human resources, with ethics officer, with health and safety officers, or with directly with company management. They have been instructed to take employee concerns seriously and help find solutions. Employees shall not be punished for raising Code of Conduct questions. All conversations will be treated confidentially.

THIRD ALTERNATIVE:

Employees may also contact responsible officer in writing by sending an email to SpeakUp@agtransport.cz.

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