

# CODE OF CONDUCT FOR BUSINESS PARTNERS AND SUPPLIERS

Gdynia Container Terminal sp. z o.o. (GCT or Hutchison Ports Gdynia), part of the Hutchison Ports Group, attaches particular importance to sustainable development and responsible business.

We expect our Business Partners and Suppliers to apply good business practices with respect for the law, local traditions and cultures, social principles and norms and responsible use of environmental resources.

We wish to support our Contractors and Business Partners in building awareness and developing practices in the conduct of activities for sustainable development and economic growth, by promoting the best ethical, social and environmental standards in their business activities.

With these standards in mind, as well as laws and regulations, both international and Polish, GCT has introduced this Code of Conduct and expects both Business Partners and Suppliers and their Employees, Agents and Subcontractors to adhere to the universal principles contained in this Code of Conduct.

In the event of any non-compliance with this Code of Conduct, the GCT expects the Business Partner or Supplier to take the necessary steps to harmonise its business with this Code. Should the Business Partner or Supplier fail to take such steps, the GCT may terminate its business relationship with them.

## Observance and promotion of ethical standards

1. The GCT encourages its Business Partners and Suppliers to operate according to the highest standards of ethical behaviour and professionalism.
2. The GCT stresses the importance of conducting business in a fair and legal manner and avoiding all forms of corruption and bribery. In particular, GCT Business Partners and Suppliers are required to implement anti-corruption policies and programmes and to verify that such policies and programmes are adhered to.
3. The GCT also encourages its Business Partners and Suppliers to establish their own policies, practices and systems to promote and disseminate their own codes of conduct within their business.

## Observing and promoting social standards

1. In order to protect the rights and dignity of Employees, GCT encourages its Business Partners and Suppliers to comply with the standards and conditions described below:

- a. Provide a fair and just working environment free from any form of harassment or discrimination on the grounds of age, race or ethnic origin, disability, race, nationality, marital status, sexual orientation, political opinion or membership of a social organisation;
- b. Provide a working environment that takes due account of health and safety at work and minimises any hazards or factors harmful to the health of employees, and comply with all legal provisions in this regard;
- c. Prohibit the use of forced, bonded, slave and child labour<sup>1</sup>, as well as any form of slavery or human trafficking, and comply with all applicable minimum age provisions;
- d. Comply with all minimum wage legislation and, where there is none, ensure that salaries are commensurate with experience and industry standards;
- e. To comply with regulations or legislation, where applicable, on maximum working hours;
- f. Implement clear, uniformly applied disciplinary practices and grievance procedures that include provisions prohibiting corporal punishment, including mental, physical or physical abuse;
- g. Ensure workers' freedom of association and free expression.

## Observing and promoting environmental standards

1. GCT encourages its Business Partners and Suppliers to consider the risks associated with the impact of their activities on climate change and to actively reduce their environmental impact.
2. GCT reminds its Business Partners and Suppliers of the value they bring to their business in terms of more responsible sourcing and efficient use of resources and monitoring and reducing waste in this regard.
3. GCT encourages its Business Partners and Suppliers to adhere to the standards, practices and policies outlined below.
  - a. To comply with all relevant local and national environmental regulations and to conduct its business in an environmentally sound manner;
  - b. To minimise the use of energy, resources such as water and paper, and reduce the emission of greenhouse gases, including CO<sub>2</sub>, resulting from their activities through the implementation of environmental policies and management systems;
  - c. To use environmentally friendly technologies that can reduce energy consumption, minimise the need for staff travel and reduce dependence on natural resources;
  - d. To increase the use of environmentally friendly, recycled and/or sustainably sourced products in its operations;
  - e. To promote the recycling of waste whilst taking the necessary precautions and ensuring compliance with the regulations relating to the handling or disposal of all hazardous materials during and/or in the course of its business.

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<sup>1</sup> The term "child" refers to: any person under the age of 14, *unless the* minimum age for work or school attendance is higher under local law, in which case a higher age applies.