

## Code of Conduct for Keltruck Limited and its Supply Chain

### Introduction

Introduction by the Board of Directors of Keltruck Limited.

Keltruck Limited is committed to conducting business with integrity and in a socially responsible and sustainable way. This includes upholding the United Nation's Global Compact's principles relating to human rights, labour practices, the environment and anti-corruption. Keltruck Limited expects its suppliers to share the commitment.

This Code of Conduct sets out minimum standards at Keltruck Limited. Keltruck Limited require its suppliers to comply with this Code of Conduct within their own business, and also within their own supply chain.

Keltruck Limited may at any time review or request a supplier to complete a self-assessment and/or allow Keltruck Limited upon reasonable notice to perform on site audits at the supplier's premises.

Keltruck Limited reserve the right to terminate any agreement with any supplier which does not comply with this Code of Conduct.

Board of Directors (Keltruck Limited)

### Legal Compliance

Keltruck Limited and its suppliers shall ensure that all activities are conducted in accordance with all applicable international, national and regional laws and regulations.

### Social Sustainability

Social sustainability relates to practices that contribute to the quality of life of both employees and communities that could be impacted by the company's operations. Keltruck Limited and its Suppliers shall ensure that they meet the following basic standards;

#### **Human Rights**

- To respect and support human rights wherever they operate and to ensure that neither the Supplier nor their employees are complicit in human rights abuses.

## Child Labour

- To comply with all applicable child labour laws.
- Not to employ any person below minimum legal age for employment.
- Not to employ children (persons under 18 years) for any hazardous work or work that is inconsistent with the child's personal development or to interfere with their education and protect against their economic exploitation.
- Where a child is employed, to keep the best interests of that child as the primary consideration.

## Forced Labour

- To employ all workers voluntarily. Forced, bonded or compulsory labour should not be used and employees should be free to leave their employment after reasonable notice.
- Not to require employees to lodge deposits of money or identity papers.

## Modern Slavery

- Not to tolerate any form of modern slavery, child, forced, bonded or compulsory labour or servitude by or in relation to the Suppliers employees, or the Supplier's suppliers.
- Not to be involved in any human trafficking activity.

## Health & Safety

- To operate in a safe, responsible manner protecting the health and safety of all, including workers, contractors, customers and the wider community.
- To provide a healthy and safe working environment for employees, in accordance with international standards and national laws.
- To provide its employees with appropriate health and safety information and training.
- To control hazards pro-actively and to take appropriate measures to prevent accidents, including assessment of operational risks.

## Freedom of association

- As far as any relevant laws allow, to allow all employees to join or not to join trade unions or similar external representative organisations. To observe applicable laws regarding collective representation.

## Discrimination

- To provide all employees with a safe, respectful work environment free from all forms of discrimination, abuse and harassment.
- To provide equal treatment of individuals irrespective of their particular characteristics and to prohibit any form of discrimination.
- To choose, employ and support employees on the basis of their qualifications and capabilities.

## **Disciplinary Practises**

- To treat employees with respect and dignity. To prohibit physical or verbal abuse or other harassment and any threats or other forms of intimidation from the work place.

## **Working Hours**

- Working hours of employees to comply with national laws.

## **Wages and benefits**

- To provide employees with details of their employment terms and conditions.
- To provide fair and reasonable pay and terms, which at the very least correspond to the legal minimum requirement.

## **Environmental Sustainability**

Environmental sustainability related to practises that contribute to the quality of the environment on a long term basis. Keltruck Limited and its Suppliers shall ensure that they meet the following;

### **Environment**

- Compliance with all applicable environmental legislation and regulations.
- Processes in place to actively improve the efficiency with which finite resources (such as energy, water, and raw materials) are used.
- Take due care to keep the negative impact on the environment as well as employees to a minimum in all activities.
- Avoid waste by recycling resources.
- Safe disposal of residual waste.
- Have appropriate measures in place to improve the environmental performance of products and services when in use by the end user.

## **Business Ethics**

Business conduct and compliance relate to the principles that guide business conduct in its relations with its business partners and customers. Keltruck Limited and its Suppliers shall ensure that they comply with the following principles;

### **Anti-Bribery and Corruption**

- No form of bribery, including improper offer for payments, commissions or kickbacks in monetary or any other form to or from employees, or organisations, is tolerated. Neither will other techniques (e.g. subcontracts, rebates, purchase orders, consulting agreements or similar arrangements) be utilised to channel payments to a third party other than compensation properly agreed.
- Decision making should not be influenced by personal interests or relationships.
- Only objective criteria should be observed.

### **Fair Market Behaviour**

- Compliance with competition and anti-trust law.
- Business shall be conducted ethically and in accordance with the law.
- Relationships between Keltruck Limited and the Supplier should be reasonable and transparent.

### **Money Laundering**

- Compliance with relevant money laundering provisions.

### **Whistle Blowing**

- An environment where any employees may raise concerns in good faith, anonymously and without fear of retaliation. A culture of openness and accountability is encouraged.

### **Confidentiality**

- Any information received in the course of business must be kept confidential, only to be used for the intended purpose and never used for any personal or illegal financial benefit or gain.