

# ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



**Milšped Group** is a leading company in the field of logistics, with a global presence across Europe, Asia, and North America. All companies operating within the Group are committed to the highest standards in their business practices, adhering to applicable anti-bribery and anti-corruption laws and regulations in countries where we operate. Our decades-long success is owed to a strategic reliance on strong corporate values, long-term partnerships, employee satisfaction, and social responsibility.

## **Our Commitment to the Prevention of Corruption**

Milšped Group is fully committed to conducting business in accordance with the highest ethical standards, integrity, and transparency in all operational contexts in which we operate. Professional conduct, conscientiousness, and full accountability are integral parts of our business operations. Our reputation has been built through a strong focus on our clients and their needs. Recognizing the importance of ensuring social responsibility and maintaining the trust of all our stakeholders, we actively direct our activities towards preventing corrupt practices and promoting a culture of ethical behavior throughout our company.

Through our Anti-Bribery and Anti-Corruption Policy we have defined general principles and rules by which we commit to conducting business in compliance with applicable laws and regulations on anti-bribery, anti-corruption, and anti-money laundering in every country in which we operate.

This policy is binding for all employees within the member companies of the Milšped Group, regardless of their position, type of engagement, or location. Milšped expects its partners, clients, and all third parties to respect and adhere to anti-corruption principles. This policy is aligned with our Supplier Code of Conduct, which outlines clear requirements related to integrity and ethical business practices, with a particular focus on the prohibition of bribery and corruption.

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

Employees are strictly prohibited from accepting, offering, or demanding bribes, and must refrain from any behavior that could raise suspicion of corrupt or illegal conduct aimed at advancing business interests or influencing the actions or decisions of relevant decision-makers. This rule applies to both direct and indirect offering or acceptance of bribes through third parties, and covers dealings with government and public officials, as well as employees of entities under direct or indirect control of the government or political parties. Its purpose is to prevent the pursuit of improper benefits or unfair advantages in any form.

Bribery is not limited to cash or material gifts and may take the form of:

- Inappropriate gifts, cash or non-cash benefits such as vouchers, gift cards, and travel;
- Excessive or inappropriate hospitality and entertainment;
- Loans, credit terms, or discounts that significantly deviate from market conditions;
- Misuse of company assets;
- Sponsorships, donations, and investments in the local community;
- Political contributions;
- Other non-commercial benefits and sponsorships that have corrupt intentions.

## **Gifts and Benefits**

Employees must demonstrate particular caution when accepting gifts and other benefits, which should be evaluated and limited within the context of healthy business relationships. Excessive or repeated gifting may be interpreted as a form of bribery and is strictly prohibited.

Acceptance of gifts and benefits is permitted only if:

- It complies with applicable laws and regulations and does not conflict with the business rules of our partners;
- It is reasonable in its value and appropriate to the occasion;
- It is not intended to influence current or future business decisions;
- It is not solicited by the recipient and does not create any sense of expectation or obligation.

Employees may accept gifts provided that:

- They are not given in exchange for actions or promises, current or future, to clients, suppliers, or third parties;
- They have not solicited the gift or service from suppliers, clients, or third parties;
- They have not put a business partner, client, or third party in a position to feel obliged to give a gift;
- The gift is not in the form of cash or a cash equivalent;
- The value of the gift is symbolic and appropriate to the context in which it is given;
- The gift does not constitute a prerequisite or condition for any future business arrangements.

Gifts given to a larger group of employees may be accepted and used in accordance with the purpose designated by the client. However, if a gift appears to be of excessive value or inappropriate, the employee is obligated to seek advice from their immediate supervisor.

### **Hospitality**

Similarly to gifts and other benefits, employees must not request any form of hospitality from clients, suppliers, or third parties. However, an unsolicited offer of hospitality may be accepted only if it is moderate and consistent with local customs, business representation norms and standard business practices.

### **Donations and Sponsorships**

Sponsorships, donations, and other forms of investment by Milšped Group in the local community aim to support the development of organizations and individuals. Such incentives are not permitted to be used by our employees as a means to conceal bribery or gain unlawful business advantages. Before entering into any sponsorship or donation agreements, we conduct due diligence on the recipient to ensure that the funds will be used for the intended purpose and in accordance with ethical standards.

### **Interaction with Public Officials**

Milšped Group expects its employees to demonstrate special care when interacting with public officials. Employees must refrain from offering any form of gifts or benefits, with a strict emphasis on the prohibition of cash or cash equivalents.

### **Employment Policy**

Milšped treats all candidates equally throughout the recruitment process, emphasizing qualifications and expertise as the primary criteria. The company does not grant preferential treatment to candidates in a manner that could influence hiring or retaining a job in a company, which is directly related to the giving or receiving of money, gifts, or services.

### **Conflict of Interest**

A conflict of interest refers to any personal or financial interest or obligation that may affect an employee's ability to perform their duties objectively and with integrity. Potential conflicts of interest may include family relatives, marriage and partnership relationships, close friendships, secondary employment, and ownership or investments in business partners or competitors. In cases where a conflict of interest exists, employees are required to report it to their supervisor to find an appropriate solution that serves the best interests of the company.

Potential conflicts of interest should be avoided or carefully managed. Employees are also expected to refrain from using their professional position to gain personal benefits or any form of illegal or unethical preferential treatment.

### **Fair Business Practices and Competition**

Milšped is committed to responsible, fair, and ethical competition. We believe that promoting healthy and fair competition among professionals strengthens the ethical business environment and drives innovation and excellence. Our competitive approach is based on the quality of our services, therefore all activities that could lead to unfair advantages over competitors through corrupt or illegal practices are strictly prohibited.

### **Accounting and Record-Keeping**

Milšped ensures that its accounting records and financial documentation comply with legal regulations. All financial transactions are carried out in accordance with authorized procedures and are recorded accurately, transparently, and in a timely manner. We exercise particular caution regarding transactions that may indicate potential money laundering, as specifically outlined in our Anti-Money Laundering and Counter-Terrorism Financing Policy.

### **Reporting Suspected Violations of Policy**

Every employee, as well as collaborators, are obligated to report any suspicion of a violation of this policy. Reports should be directed to the employee's immediate supervisor whenever possible, or alternatively submitted through one of the following channels:

- The internal portal: “Your Opinion Matters”
- Email: [speakUp@milsped.com](mailto:speakUp@milsped.com)
- The “Your Opinion Matters” suggestion box

Reports may be submitted anonymously, and the handling of such reports is conducted in accordance with the established grievance procedure.

Milšped also enables third parties—including clients, suppliers, business partners, and other stakeholders — to report any suspected violation of this policy via the following email address: [speakUp@milsped.com](mailto:speakUp@milsped.com).

Milšped will handle all reports in accordance with internal procedures and the grievance mechanism, respecting applicable laws relating to the protection of whistleblowers.

### **Procedure for handling complaints submitted by third parties**

Complaints submitted by third parties are subject to the following verification process which includes the following steps:

- Submission confirmation – if the report is not anonymous, the submitter will receive confirmation of complaint submission.
- Preliminary assessment of validity – reported case is analyzed in the context of the policy and the information available.
- Internal investigation and collection of additional information – if necessary, relevant parties within the company will be contacted to gather additional information.
- Conclusion and possible measures – based on the results of the investigation, appropriate corrective or disciplinary actions are taken.
- Notification towards the submitter – if contact is possible and permitted by law, the submitter will be informed of the outcome.

Milšped Group reserves the right not to act on reports that are clearly unfounded, malicious, or lacking sufficient information for further review.

Employees at all levels are familiar with the provisions of this Policy and are obligated to conduct their activities in compliance with it, including reporting suspicious activities. The Policy is accessible to all employees and collaborators via the internal portal and the company website. To strengthen awareness and reinforce anti-bribery and anti-corruption mechanisms, internal workshops are organized as needed.

**The Anti-Bribery and Anti-Corruption Policy** is reviewed annually and updated as necessary. This Policy is communicated within the company and is available to all interested parties.