

EVERWEST

CODE OF CONDUCT FOR SUPPLIERS

EVERWEST GROUP

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INTRODUCTION FROM THE CEO

With over 26 years of experience in road freight transportation, Everwest Group is a leading logistics provider operating across Europe and China. Our success is driven by a dedicated team of professionals committed to delivering excellence.

Everwest Group is continuously expanding its operating network into new regions, bringing cutting-edge and environmentally friendly solutions to strengthen its position in the market as the leading company that provides tailored and client-centric logistics services.

Our reputation depends on full compliance with all applicable laws, regulations, and contractual obligations in every country where we operate. Every Everwest Group company and employee must adhere to relevant national and international legislation.
The Code of Conduct reflects our commitment to the Fundamental Principles of Rights at Work, the ILO Declaration, the Ten Principles of the UN Global Compact, and the International Bill of Human Rights. As a company, together with our employees, we have a responsibility to uphold these standards.



The Supplier Code of Conduct endorses the Fundamental Principles of Rights at Work, the ILO declaration,
the Ten Principles of the UN Global Compact, and the International Bill of Human Rights. As a company, together with our employees, we have a responsibility to uphold these standards.
Similarly, our Supplier Code of Conduct sets clear expectations for supplier behavior and endorses the same principles. While the Code provides guidance, it cannot cover every possible situation that may arise during our collaboration. Therefore, we rely on your commitment to act in accordance with these principles.

Zigmas Mikoliūnas,

CEO Everwest Group

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WORKING CONDITIONS

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We expect our Suppliers to show a strong support for human rights provided in the Charter of the United Nations Universal Declaration of Human Rights. These are fundamental and should always be protected. It is our policy that all Suppliers who directly or indirectly participate in the delivery of products, components, materials and services to Everwest Group, must be treated with dignity and shown the highest respect for their fundamental rights.

1.1 COMPLIANCE WITH THE UN HUMAN RIGHTS

As a Supplier you must support and always work to comply with conventional human rights and labour laws and recognise and support equal human rights.

You must not tolerate:

- differential treatment;
- discrimination;
- harassment;
- inappropriate or unreasonable interference with work performance.

The above applies irrespective of age, nationality, race, disability, or gender, including gender identity or gender expression, sexual, religious, or political orientation, and ethnic or social background. Physical, sexual, mental, or verbal abuse is prohibited, as are threats of abuse and any form of intimidation.

1.2 FIGHTING MODERN SLAVERY

As a Supplier you must not tolerate any practices of human trafficking, forced labour, and debt servitude across our supply chains and in any other part of our business.

Forced employment and working conditions resembling servitude are prohibited.

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1.3 RIGHTS OF MINORITIES AND INDIGENOUS PEOPLES

Suppliers must respect and uphold the rights of minorities and Indigenous peoples in all aspects of their operations. This includes recognizing cultural heritage, traditional knowledge, and the rights of Indigenous communities to self-determination. Suppliers must not engage in or support discrimination, marginalization, or exploitation of minority or Indigenous groups. Any business activities that may impact Indigenous communities must be conducted with Free, Prior, and Informed Consent (FPIC) and in accordance with local and international human rights standards.

1.4 ETHICAL RECRUITING

Suppliers must ensure fair, ethical, and transparent recruitment and employment practices. All workers must be hired voluntarily and provided with clear, written terms of employment in a language they understand. Suppliers must not engage in any form of forced labor, debt bondage, or human trafficking. The charging of recruitment fees to workers is strictly prohibited. Suppliers must ensure that all employees, including migrant workers, retain control over their identification documents and personal belongings.

1.5 CHILD LABOUR

The minimum age for workers is not less than 18 and complies with:

- the national minimum age for employment, or;
- the age of completion of compulsory education, whichever of these is higher.

There shall not be a recruitment of child labour, this is defined as any work performed by a child younger than the ages specified above.

No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety, or morals, including night work.



If local minimum is set at no lower than 14 years in accordance with developing country exceptions under ILO Convention 138,

this lower age may apply. As a Supplier, you are expected to commit to reacting instantaneously to all instances where child labour is identified, acting in the best interest of the child, by ensuring that the child is removed from their job position and is provided with sustainable alternatives for further development. You are expected to inform Everwest Group if you become aware of Child Labour across in your supply chain.

1.6 REGULAR EMPLOYMENT

You must comply with current national legislation and agreed standards for employee working hours, wages, and work environments.

Obligations to your employees under international conventions, national law, and regulations concerning regular employment are not avoided through the use of short-term contracting (such as contract labour, casual labour, or day labour), sub-contractors, or other labour relationships.

The following rules always apply:

- employees have the right to join a union and to collective bargaining;
- constructive dialogue between employer and employee is fully supported;
- all workers are entitled to a contract of employment in a language they understand;
- employees must receive a letter of confirmation of their employment conditions if required by national legislation;
- employees have the right to leave Everwest Group, a right that is stated in the employment contract and is an integral part of the local labour code;
- the duration and content of apprenticeship programmes are clearly defined;
- a record of every employee's working hours and wages is kept, ensuring compliance and transparency.

1.7 WAGES

The remuneration of employees, including the benefits provided, as a minimum must meet national legal standards and -/- or industry benchmark standards, whichever is higher.

A deduction from wages as a disciplinary measure shall not be permitted.

All workers are provided with a written and understandable contract outlining their wage conditions and method of payments before entering employment.

1.8 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers must recognize and respect the rights of workers to freely associate, form, join, or refrain from joining labor unions and other worker organizations without fear of retaliation, intimidation, or harassment. Suppliers must also respect the right of workers to engage in collective bargaining in accordance with local laws and international labor standards.

1.9 WOMEN'S RIGHTS

Suppliers must actively promote gender equality and prevent discrimination against women in the workplace. Women must be provided equal opportunities in hiring, compensation, training, promotions, and leadership roles. Suppliers must ensure a safe and inclusive work environment free from harassment, abuse, and gender-based violence. Maternity rights and other gender-specific protections must be upheld in compliance with international labor standards and local laws.



All workers are provided with a written and understandable contract outlining their wage conditions and method of payments before entering employment.

1.10 DRIVING TIME AND REST PERIODS FOR OUR DRIVERS

Suppliers providing haulier services must ensure that maximum daily and fortnightly driving times, as well as daily and weekly minimum rest periods for all drivers are regulated in accordance with the EU rules or local laws in countries where EU regulations do not apply.

You should have established guidelines for following these regulation rules.

1.11 CABOTAGE AND INTERNATIONAL DRIVING

We expect our Suppliers providing haulier services to take a stance against traffic offences and constantly work on developing monitoring systems and on improving driver education to prevent traffic offences.

All applicable international and national traffic rules must be respected.

You must follow the EU and non-EU countries rules for cabotage to prevent cabotage infringements and adjust our processes and operations respectively.

1.12 SUPPLY CHAIN SECURITY

We expect our Suppliers to ensure security throughout their entire supply chains, including the traditional practices of supply chain management with the security requirements, for combatting threats such as terrorism, piracy and theft.

You should cooperate with the border control and other official institutions to prevent illicit trafficking and brokering of material.

Suppliers providing haulier services are required to have policies in place ensuring the security of cargo transported on the behalf of Everwest Group.

1.13 USE OF PRIVATE AND PUBLIC SECURITY FORCES

Suppliers must ensure that any private or public security personnel employed in their operations adhere to international human rights standards, including the Voluntary Principles on Security and Human Rights. The use of security forces must be limited to lawful and necessary measures for the protection of people and assets. Suppliers must prohibit excessive force, intimidation, or any human rights violations by security personnel acting on their behalf. Any incidents of misconduct must be reported and addressed through appropriate grievance and accountability mechanisms.

HEALTH AND SAFETY

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Health, safety and well-being of employees should be a core value of your company. It is critical that you ensure a healthy physical and psychological working environment for your employees in each of their workplaces, whether on the road, own sites committed to not only monitoring and improvement but proactive approach to safety. Each employee should contribute to upkeeping their safety at work and the creation of a safe environment for their colleagues, through compliance with all safety regulations and exercising care to prevent accidents.

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2.1 HEALTH AND SAFETY AT WORK

As a Supplier, you are expected to be committed to:

- treating health and safety as a core value of company. All attitudes, choices, and actions in all respects take consider safety. What is leading to proactive approach to safety to eliminate all
- possible hazards in occupational environment.; creating an accessible occupational health and safety management system that minimizes or eliminates risk of injury or illness;
- engaging with all staff, visitors and partner organsations in creating a safe working environment and safe systems of work;
- developing and maintaining a behaviour-based safety policy that encourages all personnel
- to actively manage occupational health and safety risks;
- Providing a continuously improving occupational health and safety management system by foreseeing approach by taking initiative to eliminate all hazards;
- operating a no blame safety culture where employees are encouraged to speak openly about problems and the obstacles to progress;
- Aiming to meet the highest possible standard of health and safety management system.
- Everwest Group leaders are empower employees to put safety before results and to create Health and safety environment.
- To ensure the most safe and hygienic working conditions with use of the newest scientific and technical achievements.

You should take the following actions to safeguard health and safety procedures at work:

- compliance with all relevant occupational health and safety legislation and requirements;
- occupational health and safety training for all staff; occupational health and safety information and instruction to all personnel;
- engagement with and inclusion of staff in consultation processes for decision making where there is an impact on workplace health and safety as well as improve safe environment and safety culture awareness;
- documentation and communication of occupational health and safety responsibilities, authority to act, and reporting requirements for personnel at all levels in the workplace;
- learning from incidents, is just one of many activities in managing safety that are registered internally and investigated along with Incident sharing and Near miss reporting;
- active identification and management of occupational health and safety risks, through the systematic identification and hazards, risks and implementation of effective risk controls; prompt reporting of hazards, incidents and injuries, investigation where appropriate, and implementation of control measures to eliminate or minimize the risk of reoccurrence;
- Suppliers must conduct risk assessments to identify potential hazards associated with the chemicals, or substances you handle. It is essential to provide appropriate training and resources to employees to ensure safe handling procedures and emergency response protocols related to chemical exposure;
- You as Supplier should have procedures in place to ensure on time reporting, investigation, communication, and preventive actions of further occurrences of work-related health, safety and wellbeing incidents and Near miss events within your company;
- A zero tolerance to alcohol and substance abuse at the workplace.

2.2 BEHAVIOUR BASED SAFETY POLICY

Safety is one of the main goals in terms of people and the cargo that we are delivering. To secure people and maintain ongoing operations Suppliers should have a Behaviour Based Safety (BBS) policy in place, that covers all the activities and areas needed to reduce the number of accidents.

Suppliers should be involved at every stage of the BBS policy to ensure alignment across the whole Suppliers' company and its operations. Leaders are inspiring and empowering employees to implement safety behavior in their day-to-day life. To secure continuous improvement you should cooperate with your colleagues to identify and resolve hazards that occurs in their work environment. Suppliers should also have specified and provided appropriate Personal Protective Equipment for each place of work, with clear instructions on how to use them, with a maintenance and servicing process in place.

The BBS system should be evaluated internally on a regular basis. The goal is to learn from observations and to positively influence the future behaviour of workers to gradually improve the safety culture across the organisation.

Unsafe actions, poor decision-making, at-risk behaviour, etc. are signs that the company has a poor safety culture. You as a Supplier must show commitment which involves the management and employees attending regular safety meetings, trainings according to risk assessment on each workplace.

Additionally, Suppliers should have implemented a Near Miss Reporting System when an unsafe condition, near miss etc. is reported and communicate back what actions have been taken to avoid future incidents and reduce the number of accidents. All written procedures and instructions are communicated internally on a regular basis, establishing a sufficient level of information to secure the safety of our employees and the community.

Your management leads by example in following procedures and using PPE and are open to any suggestions or concerns from employees on improving safety systems and procedures. As we know that safety issues are crucial, senior management along with employees do take immediate actions whenever there is an unsafe situation or near miss reported and communicate widely and openly the action plans for future improvements.

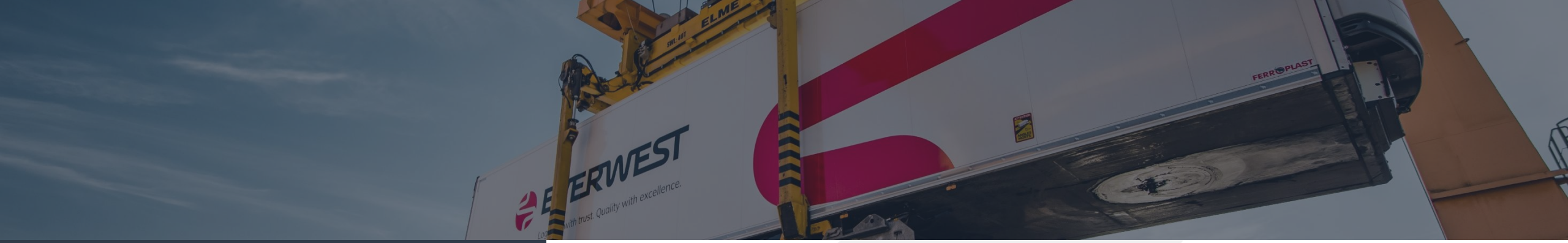
You should encourage a team spirit and trust between employees and management, and show commitment to safety within all activities, through regular controls, discussions and improvement programmes.



COMPETITION

3





Competition laws, like all other legislation, are vital to us and must always be strictly adhered to. To ensure compliance we must be aware of situations that could have an impact on competition.

Agreements, regardless of contract form, must always be negotiated in compliance with fair competition principles.

3.1 LIMITATION OF COMPETITION

You must not conclude any formal or informal contracts or agreements with the intention or probable effect of illegally restricting, eliminating, preventing, or distorting competition.

Suppliers must not take part in any anti-competitive activities. These consist of, but are not limited to:

- limitation or controlling of production or capacity;
- price-fixing;
- market sharing or market division;
- limitation and control of capacity; meetings, conferences, forums, committees, and similar which are organized by trade or industrial organisations and may have an anti-competitive effect;
- exchange of information concerning prices or other terms and conditions regarding Everwest Group companies, Suppliers or other related third parties;
- exchange of other illegal or confidential information.

3.2 MEETINGS, CONFERENCES AND VENDOR EVENTS

Never discuss business-related, potentially competition restricting topics with competitors. If competition restricting topics are discussed at a meeting or industry forum, in disagreement with competition law, you must leave the room immediately and request that your departure and refusal to participate be entered into the minutes of the meeting. If minutes are not usually prepared at such meetings, employees must request the preparation of such minutes. If the request is not accommodated, employees must write their own minutes and inform senior management accordingly.

You are advised to proceed with caution not only in physical meetings but also when participating in virtual forums (telephone meetings, social media forums, video calls, webcasts, etc.) where information may be published or shared.

If participation in such events takes place, be aware that any agreements made in such events, regardless of contract form, must always be negotiated in compliance with fair competition principles.

You should consult your immediate manager or the relevant senior management before participating in events where competitors may be present and business-related topics might be discussed formally or informally, this also applies to vendor events.



ETHICS AND INTEGRITY

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Everwest group is committed to the highest ethical standards and compliance with all applicable laws, rules, and regulations. In particular, Everwest Group requires Suppliers to adhere to the following standards:

4.1 ANTI-CORRUPTION AND BRIBERY

Suppliers must completely comply with all applicable bribery and anticorruption laws (both internationally and locally). We are devoted to doing business with great integrity, and we will not allow any sort of bribery or corruption, including embezzlement, money laundering, kickbacks, extortion, fraud, nepotism (family), or cronyism (friends).

4.2 GIFTS AND ENTERTAINMENT

Suppliers must not offer or receive any gift in order to achieve inappropriate benefits or influence for themselves, Everwest (including Everwest employees, family members, and affiliates), or any third party. Benefits, fees, commissions, dividends, cash, gratuities, services, and other inducements are all examples of gifts.

4.3 NON-RETALIATION FOR REPORTS OF CONCERN

Everwest expects suppliers to have a policy and procedure for reporting workplace problems. The policy and method should be transparent and understandable, and individuals who report or participate should be protected from reprisal.

4.4 CONFLICT OF INTEREST

A conflict of interest is defined as any personal or financial interest, commercial or personal activity or relationship, former or present employment, or commitment that may interfere with the capacity to objectively perform work tasks and obligations or undermine independence and impartiality.

4.5 MONEY LAUNDERING & FINANCIAL RECORDS

The supplier must follow applicable rules and regulations aimed at combating money laundering activities. The supplier must keep financial records and reports in accordance with applicable laws and regulations.

4.6 SANCTIONS

Sanctions are legal instruments used by governments and multinational bodies to influence foreign policy by prohibiting business dealings with certain countries, individuals, entities or sectors.

4.7 REPORTING IRREGULARITIES

Everwest encourages anyone who wishes to report any violations from what is outlined in this SCoC to write an e-mail to signal@everwest.net or report online: (click this link).

4.8 FINANCIAL RESPONSIBILITY & ACCURATE RECORDS

Suppliers must ensure that all financial records, transactions, and reports are accurate, complete, and transparent. Suppliers are expected to comply with all applicable financial reporting regulations and international accounting standards. Any form of fraud, misrepresentation, tax evasion, or falsification of records is strictly prohibited. Everwest reserves the right to audit financial records related to business transactions to ensure compliance with ethical and legal standards.

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DATA PROTECTION, INFORMATION SECURITY AND DISCLOSURE OF INFORMATION

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Everwest requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information.



CONFIDENTIAL ASSETS AND INFORMATION

Suppliers must protect Everwest and its clients' confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information.

PERSONAL INFORMATION AND PRIVACY

Everwest requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of Everwest should only be used, accessed, and disclosed as permitted by the Supplier agreement. The definition of personal data, and the legal requirements for safeguarding it, vary by country. It could include someone's names, personal healthcare information, photographs, or identity number.

CYBER SECURITY

The Supplier must ensure that it has adequate and up-to-date cyber security measures in place to protect its own and the Client's data, systems, and networks from cyber threats, such as malware, phishing, ransomware, denial-of-service attacks, data breaches, and unauthorized access.

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ENVIRONMENTAL MANAGEMENT SYSTEM

6



Everwest Group is committed to minimizing pollution, promoting efficiency and the use of sustainable and renewable resources, including energy, fuel, and water, and reducing Greenhouse gas (GHG) emissions.

To ensure that Everwest Group contributes to Environmental protection and decarbonisation, we systematically develop and continuously improve Environmental Management System, and it is exptected to be at our suppliers.

We expect our Suppliers to collaborate in achieving the main topics of our Environmental policy, which are:

- to apply green criteria for purchasing;
- to measure CO2 emissions and provide them with reports;
- to manage potential environmental incidents and to be ready to address any issues that arise;
- to search new green solution;
- to increase waste sorting and recycling;
- to monitor and comply with the legal requirements of all countries in which Suppliers operates;
- Build awareness by involving suppliers employees and partners in efforts to protect the environment: minimizing water consumption, foster waste reduction and the importance of recycling.
- You must look for and offer sustainable and innovative systems that continually reduce our, our customers' and your, as a suppliers' environmental impact, such as noise, air pollution.
- We recognize healthy soil as a vital for sustainable, ecosystems, and our communities.

Soil quality

We are committed to maintaining high standards of environmental responsibility throughout our supply chain. As a supplier, you are expected to adhere to the following principles regarding soil quality: minimizing contamination, promote biodiversity within the soil ecosystem and provide trainings and education for your employees.

Animal welfare

We recognize that the ethical treatment of animals is essential to our values and our commitment to sustainability and social responsibility

Suppliers are required to ensure that all animals in their operations are provided with appropriate housing, nutrition, and access to clean water, minimizing stress and suffering.

Land, Forest, and Water Rights & Forced Eviction

Suppliers must respect the land, forest, and water rights of local and Indigenous communities. Suppliers are prohibited from engaging in land grabbing, forced evictions, or any unlawful acquisition or exploitation of natural resources. Any land use, development, or resource extraction activities must be transparent, legally compliant, and include meaningful consultation with affected communities to ensure fair and ethical practices.

As a Supplier, you should take action to minimize adverse impacts on human health and the environment throughout the value chain. To the extent possible and when available, you must look for and offer sustainable and innovative services, corresponding to our environmental considerations and supporting our business model development and improvement.

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COMPLYING WITH THE CODE OF CONDUCT

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We, as a company, strive to uphold these standards throughout our entire supply chain, therefore our Suppliers are expected to respect the Supplier Code of Conduct across their business activities, when conducting business on behalf of Everwest Group and when choosing business partners. We expect you to promote the values and policies outlined in Everwest Group Supplier Code of Conduct across your supply chain.

If you need assistance or have questions or concerns about the Supplier Code of Conduct, you should first seek advice from Everwest Group.

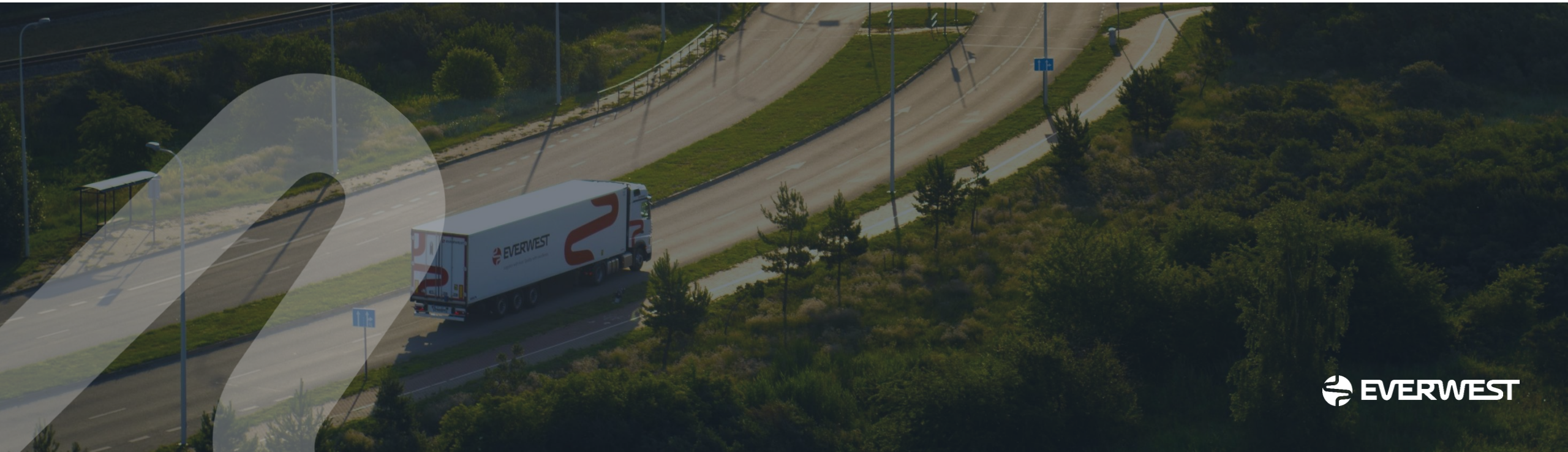
You can do this by consulting your contact at Everwest Group or through the Whistleblower Program (by email signal@everwest.net or phone 700 55 755).

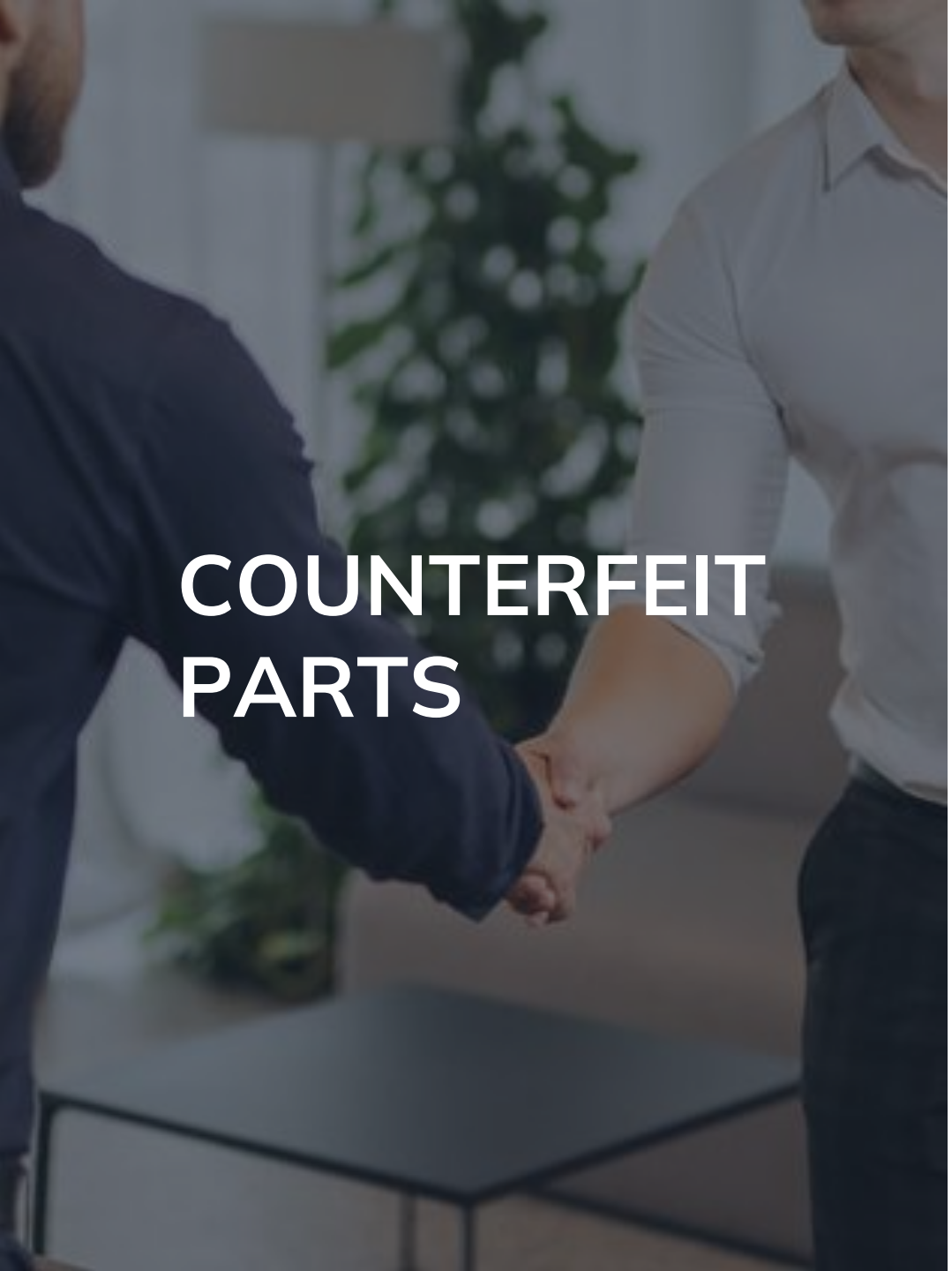
Everwest Group reserves the right to check how Suppliers comply with the Code of Conduct.

Any breaches may lead to measures up to and including immediate termination of the business relationship.

At Everwest Group, we encourage and seek out collaboration to promote these

standards, and continuously review them. We strongly encourage such practice to be extended into our Suppliers' operations, upholding the Supplier Code of Conduct.





COUNTERFEIT PARTS

POLICY: Everwest Group is committed to ensuring the authenticity and integrity of all parts and materials used in its operations. The use, procurement, or distribution of counterfeit parts is strictly prohibited to maintain safety, reliability, and compliance with industry standards.

REQUIREMENTS:

- All parts and materials must be sourced from authorized, reputable suppliers and accompanied by verifiable documentation (e.g., certificates of authenticity).
- You must not procure, use, or distribute counterfeit parts—defined as items misrepresented as genuine, including unauthorized copies or substitutes—in any Everwest Group operations, such as vehicle maintenance or supply chain activities.
- Employees involved in procurement and maintenance must verify the authenticity of parts and report any suspected counterfeit items immediately.

REPORTING VIOLATIONS: If you suspect or identify counterfeit parts in use or within the supply chain, report it promptly to your immediate manager, senior management, or through the Everwest Group Whistleblower Programme (email: signal@everwest.net or call anonymously: +37052177396).

TRAINING AND AWARENESS: Everwest Group will provide training to employees in procurement, supply chain, and operational roles to recognize and prevent the use of counterfeit parts, delivered via online platforms, phone briefings, and email communications.

CONSEQUENCES: Failure to comply may result in disciplinary action, up to and including termination, and potential legal repercussions.

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POLICY: Everwest Group respects and protects intellectual property rights, including patents, trademarks, copyrights, and trade secrets, and expects all employees, suppliers, and partners to uphold these standards.

REQUIREMENTS:

- You must not use, reproduce, or distribute any intellectual property belonging to Everwest Group, its customers, suppliers, or third parties without proper authorization.
- All intellectual property created during your employment with Everwest Group is company property and must be safeguarded from unauthorized disclosure.
- When using third-party intellectual property (e.g., software or designs), ensure proper licenses are in place and comply with their terms. Unauthorized use or piracy of copyrighted materials is prohibited.

REPORTING VIOLATIONS: Any suspected infringement of intellectual property rights—whether Everwest Group's or a third party's—must be reported immediately to your immediate manager, senior management, or via the Whistleblower Programme (email: signal@everwest.net or call anonymously: +37052177396).

TRAINING AND AWARENESS: Training on intellectual property rights and obligations will be provided to all relevant employees through online, phone, and email channels.

CONSEQUENCES: Violations may lead to disciplinary measures, including termination, and potential legal action.





EXPORT CONTROLS AND ECONOMIC SANCTIONS

POLICY: Everwest Group complies fully with all applicable export control laws and economic sanctions in the regions where we operate (Europe, CIS, China), ensuring lawful international trade and avoiding prohibited transactions.

REQUIREMENTS:

- You must ensure all transactions, including transportation and services, comply with export control regulations, obtaining necessary licenses or permits for controlled goods or technologies.
- Business dealings with individuals, entities, or countries subject to economic sanctions (e.g., by the UN, EU, or other authorities) are prohibited. Conduct due diligence to screen partners against sanctions lists.
- You must not engage in exports, re-exports, or transfers to restricted destinations or parties without prior approval from senior management.

REPORTING VIOLATIONS: Suspected breaches of export controls or sanctions must be reported immediately to your immediate manager, senior management, or through the Whistleblower Programme (email: signal@everwest.net or call anonymously: +37052177396).

TRAINING AND AWARENESS: Employees involved in international operations will receive training on export controls and sanctions, delivered via online platforms, phone, and email.

CONSEQUENCES: Non-compliance may result in disciplinary action, up to termination, and could expose the company and individuals to legal penalties.

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signal@everwest.net | 700 55 755