

EVERWEST

CODE OF CONDUCT

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.



Our Code of Conduct sets out what behavior is expected of the Everwest Group and its employees, business partners, and customers. It is the responsibility of all employees to understand and adhere to the company's policies and procedures. However, the Code cannot cover every issue that may arise in our company, and therefore, you should always use common sense when conducting business on behalf of the Everwest Group. If you are uncertain about any public laws, policies, or contractual obligations, then seek advice.

Zigmas Mikoliūnas,

CEO Everwest Group

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CONTINUOUS IMPROVEMENT AND QUALITY MANAGEMENT POLICY

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The policy is realized via an integrated management system, which covers the standards of quality, the physical safety of cargo, the safety of medicinal drugs and production for medical purposes, food product safety, employee health and security, transportation of chemical industry goods, and environmental protection.



Integrated quality management system policy:

- ensure employee involvement and reaching for results, based on the organization's strategic goals and Our Sense of Purpose;
- offer high-quality services which meet clients' demands; create additional value for clients while ensuring profitable growth of the organization;
- guarantee to stick to the stated quality and other standards;
- raise employee qualifications, professionalism, and work efficiency;
- encourage and foster the culture and quality management system to ensure continuous organizational development and improvement;
- realize and develop operations based on LEAN philosophy and methodology, removing unnecessary waste;
- operate with the aim to reduce CO_2 emissions and involve employees and partners in environmental protection initiatives.

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WORKING CONDITIONS

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In Everwest Group we strongly believe in human rights, as 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 people who carry out work and services for Everwest Group, whether directly as Everwest Group employees or indirectly as employees of our suppliers, must be treated with dignity and shown the highest respect for their fundamental rights.

2.1 COMPLIANCE WITH THE UN HUMAN RIGHTS

Everwest Group fully supports and will always work to comply with conventional human rights and labour laws.

The diversity of our employees contributes to the success of our company. We actively promote a work environment that values equality, diversity, and inclusion where all employees feel equally accepted.

You must recognize and support equal human rights for all.

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.

2.2 FIGHTING MODERN SLAVERY

Everwest Group is committed to the fight against and does 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.

2.3 ETHICAL RECRUITING

Everwest is committed to fair, ethical, and transparent recruitment and employment practices. We ensure that all workers are hired voluntarily and receive clear, written terms of employment in a language they understand. Everwest does not tolerate forced labor, debt bondage, or human trafficking.

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2.3 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.

Everwest Group commits to react immediately 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.

2.4 REGULAR EMPLOYMENT

Everwest Group complies with current national legislation and agreed standards for employee working hours, wages, and work environments.

Obligations to 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.

2.5 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.

2.6 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Everwest respects and upholds the rights of employees to freely associate, form, join, or refrain from joining labor unions and other worker organizations without fear of retaliation, intimidation, or harassment. We recognize the right of employees to engage in collective bargaining in accordance with local laws and international labor standards. Everwest does not tolerate any form of interference, discrimination, or punitive action against employees exercising these rights.

2.7 WOMEN'S RIGHTS

Everwest is dedicated to fostering an inclusive and equitable workplace where women have equal opportunities in hiring, compensation, training, promotions, and leadership. We actively prevent and address gender-based discrimination, harassment, and violence in the workplace. Everwest upholds maternity rights and other gender-specific protections in full compliance with international labor standards and local laws, ensuring a safe and supportive work environment for all.



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.

2.6 DRIVING TIME AND REST PERIODS FOR OUR DRIVERS

Maximum daily and fortnightly driving times, as well as daily and weekly minimum rest periods for all drivers at Everwest Group are regulated in accordance with the EU rules or local laws in countries where EU regulations do not apply.

Guidelines are established for how to follow these regulations, including installing a real-time telematics system which provides online access to drivers' tachographs and card data, in addition, we have an increasing number of trucks with new digital tachographs.

2.7 CABOTAGE AND INTERNATIONAL DRIVING

Everwest Group is strictly against traffic offences; the company constantly works on developing monitoring systems and on improving driver education to prevent traffic offences.

All applicable international and national traffic rules must be respected.

Everwest Group follows the EU and non-EU countries rules for cabotage. By using a combination of education, planning, and integrating telematics data with our IT systems we can monitor our network and avoid mistakes regarding cabotage. We work closely with national institutions to prevent cabotage infringements and adjust our processes and operations, respectively.

2.8 SUPPLY CHAIN SECURITY

Combining traditional practices of supply chain management with the security requirements, for combatting threats such as terrorism, piracy, and theft, Everwest Group commits its efforts to ensure security throughout its entire supply chain.

Everwest Group cooperates with the border control and other official institutions to prevent illicit trafficking and brokering of material.

Main supply chain security activities include verification of participants in the supply chain as well as screening and validating the contents of cargo.

2.9 RIGHTS OF MINORITIES AND INDIGENOUS PEOPLES

Everwest is committed to respecting and upholding the rights of minorities and Indigenous peoples across all areas of our operations. We recognize and honor cultural heritage, traditional knowledge, and Indigenous communities' rights to self-determination. Everwest does not tolerate discrimination, marginalization, or exploitation of minority or Indigenous groups. Any business activities affecting Indigenous communities will be conducted in accordance with Free, Prior, and Informed Consent (FPIC) principles and in compliance with local and international human rights standards.

2.10 USE OF PRIVATE AND PUBLIC SECURITY FORCES

Everwest upholds the highest ethical standards in the use of security forces to protect our employees, assets, and operations. We prohibit excessive force, intimidation, or any human rights violations by private or public security personnel acting on our behalf. Everwest requires all security forces associated with our operations to adhere to international human rights standards, including the Voluntary Principles on Security and Human Rights. Any security-related misconduct must be reported and addressed through our accountability mechanisms.

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HEALTH AND SAFETY

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Health, safety and well-being of our employees is a core value of our company. It is critical that we ensure a healthy physical and psychological working environment for our employees in each of their workplaces, whether on the road, our own sites or those of our clients, we are 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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3.1 HEALTH AND SAFETY AT WORK

Everwest Group is:

- 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 minimises or eliminates risk of injury or illness;
- engaging with all staff, visitors and partner organizations 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 continiuosly 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;
- Everwest Group leaders are empower employees to put safety before results and to create Health and safety environment.
- To ensure the most safe, ergonomic workplace and hygenic working condition.
- Ensure the safety of all individuals on company's premises by reducing the risk of fire-related incidents and providing procedures to prevent fires from occurring, regular maintenance of electrical systems, and employee training.

Everwest Group takes the following:

- 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;

We have procedures in place to ensure on time reporting, incident and accident management investigation, communication, emergency preparedness and preventive actions of further occurrences of work related health, safety and wellbeing incidents and Near miss events within the Everwest Group. This applies to all operating areas, for all employees and sub-contractors.

A zero tolerance to alcohol and substance abuse at the workplace.

3.2 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 we have a Behaviour Based Safety (BBS) policy in place, that covers all the activities and areas needed to reduce the number of accidents.

We are involving management at every stage of the BBS policy to ensure alignment across the whole Everwest Group and its operations. Our leaders are inspiring and empowering employees to implement safety behavior in their day-to-day life. To secure continuous

improvement we cooperate with our colleagues to identify and resolve hazards that occurs in their work environment. We have also 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 is 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.

It is acknowledged by the management that unsafe actions, poor decision making, at risk behaviour, etc. are signs that the company has a poor safety culture. For the management to evolve the safety culture it must show commitment which involves the management and employees attending regular safety meetings, trainings according to risk assessment on each work place, and initiatives like the ECO Driving training league or annual mandatory safety training courses for drivers how to drive safely and work with machines (equipment), Gemba Safety Walks during which we point out the hazards to employee and tell them what are possible consequences of unsafe actions.

Additionally, we 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.

Our top 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.

We 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.



EVERWEST SUPPLY CHAIN SECURITY POLICY

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Everwest Group commits to ensuring supply chain security according to the newest version of the TAPA Trucking Security Requirements (TSR) standard, when organising international and domestic transportation by road of high-value cargo. This policy is applied to all companies and operational areas of the group, directly or indirectly linked to the transportation and transportation organisation of high-value cargo at risk of being stolen.

This policy is based on the main TAPA TSR principles for supply chain and cargo security, modelling our operations across the whole supply chain.

4.1 THE GENERAL PRINCIPLES OF SUPPLY CHAIN SECURITY

All employees and contractors related to the transportation of high-value cargo at risk of being stolen must be aware of and take responsibility for the security aspects of the organisation's business.

Everwest Group commits to appointing a person responsible for supply chain security, with the aim to ensure a secure supply chain, and smooth operation and monitoring of the TAPA TSR programme.

Everwest Group commits to providing employees with appropriate supply chain security training. Hazard analysis and risk assessments must be carried out regularly.

Security procedures and guidelines must be effectively integrated into business operations. Incident prevention must be the main priority.

Safety precautions and procedures must be regularly checked and approved by the person responsible, aiming to maintain the high operational safety standards of Everwest Group.

The professionalism, knowledge, and integrity of the employees related to the security questions must be controlled.

Education plans, employment, contract formation and termination procedures must be set and appropriately implemented.

All cases, including security breaches, must be reported; the cases must be analysed, and

corrective actions must be taken to improve the overall security level.

COMPETITION

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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.

5.1 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.

You 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.

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5.2 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.



ANTI-CORRUPTION

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Everwest Group operates using the following specific rules to address anti-corruption. The principles do not prohibit normal and appropriate hospitality given or received. If in doubt, please contact your immediate manager or senior management.

6.1 BRIBERY

Bribery refers to any offer, kickback or acceptance of a gift, loan, fee, remuneration or anything of value to or from another person or entity as an incentive to influence or promote a certain act or omission which would not have been appropriate in the absence of the bribery. The prohibition of bribery extends beyond monetary transfers and includes the transfer of any kind of assets.

Consequently, the prohibition covers bribery in the form of payment of travel expenses; disproportionate entertainment expenses; charitable donations; delivery of products or services; transfer of financial or other personal benefits.

Everwest Group does not tolerate any form of bribery, without exception, including in countries where bribery is legal or where it is accepted as normal business practice.

You must not accept or offer a bribe of any kind.

6.2 KICKBACKS

Kickbacks are considered as a form of bribery. All prohibitions towards bribery apply for kickbacks.

You must not accept or offer a kickback.

6.3 FACILITATION PAYMENTS

Facilitation payments are often small payments made to lower-level public officials to ensure their performance or to speed up a government or official process, which the employee is already duty-bound to perform.

You must not make facilitation payments or accept such practice in any country by any parties, including third parties acting on behalf of Everwest Group, even if they are a part of local law or local custom.ffer a kickback.

6.4 MONEY LAUNDERING OR FINANCING OF TERRORISM OR OTHER CRIMINAL ACTIVITIES

Money laundering is the act of concealing or disguising money obtained from criminal activities and making them appear to have originated from legitimate sources or constitute legitimate assets. Concealment of the fund source or the intended use of funds may be involved in funding terrorism operations.

You must not engage in money laundering, funding of terrorism, funding of other criminal activities or be involved in any other activities that facilitate money laundering.

GIFTS AND DONATIONS

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While entertainment, hospitality and the exchange of business gifts are considered common practice and part of building and maintaining business relationships throughout the world, we should limit this to the absolute minimum.



7.1 NO GIFT POLICY

The No Gift Policy strictly prohibits all employees from giving or accepting gifts no matter the value or the reason (except token gifts of nominal value). You must not solicit, accept, or offer gifts to clients, prospective clients, business partners, government officials, suppliers or any other third parties.

Although gifts may be well intended, it can potentially pose as a conflict of interest or might be seen as act of corruption. The No Gift Policy is in place to avoid situations which may influence the employee's judgment in a decision-making process or put the employee in a position of conflict or obligation not in the best interests of Everwest Group.

An exemption to the policy is token gifts that are of nominal value, for example gifts with a company logo (such as pens, notepads, planners, calendars and other small promotional items) that are given out to employees, customers, delegates, students and members of the public, attending events such as conferences, exhibitions, trainings, career fairs, etc., and deemed as part of a company's brand building or promotional activities.

If you are offered a free dinner or to take part in an activity of a similar nature, you must disclose this to your immediate manager and get approval before accepting.

The No Gift Policy applies to all of the Everwest Group, its employees, and their family members. If there is a doubt, check with your immediate manager or senior management when further clarification is needed.

7.2 DONATIONS TO CHARITY

Everwest Group recognises the importance of companies in supporting charities and local communities.

Reasonable support and donations may be in the form of payment, services or materials and must be approved by the relevant senior management.

It must be ensured that any payments to community organisations are not a form of bribery and are not used as a cover for

fraud. Contributions or sponsorships must be disclosed, transparent and in accordance with national legislation.

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CONFLICTS OF INTEREST

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A conflict of interest is when an employee's obligations and interests when acting on behalf of Everwest Group conflict with his or her personal interests. It is important that employees conduct business activities in the best interest of Everwest Group. It is the responsibility of every employee to exercise personal judgement regarding conflicts of interest in compliance with internal rules of prevention of conflict of interest and to seek advice from their immediate manager or senior management when in doubt.

8.1 SUPPLIERS AND CUSTOMERS

You must not participate in any commercial transactions between a Everwest Group company and a supplier or customer in which you have direct or indirect personal interests, financial or otherwise.

The transactions must be approved in advance by senior management of the relevant Everwest Group company.

This is applicable to transactions between a Everwest Group companies and all natural and legal persons that are related parties to senior management. Examples of related parties are

family members, companies of family members, own companies, other companies in which the relevant member of management has significant influence.

8.2 EMPLOYMENT OF RELATED PARTIES

Reporting relationships, direct or indirect, are not permitted between related parties employed by Everwest Group, at any stage of employment, from the start of employment and if a relationship develops during employment.

Direct reporting relationship is between an employee and his/ her immediate manager. Indirect reporting relationship is between two employees in the same reporting line, but with other managers in between.

In cases where there is no reporting relationship, direct or indirect, appointing or keeping related parties in the same unit needs to be thoroughly reviewed.

In case you find yourself in reporting relationships during employment you should seek advice from their immediate manager or senior management.

8.3 MONETARY LOANS TO EMPLOYEES

It is forbidden to give loans to employees and to parties related to its employees.

Other grounds when an employee could be found in a conflict of interest shall be provided in internal rules which have to be strictly followed.

8.4 FINANCIAL RESPONSIBILITY & ACCURATE RECORDS

Everwest is committed to maintaining the highest standards of financial integrity and accountability. All financial transactions, records, and reporting must be accurate, transparent, and compliant with applicable laws, regulations, and accounting standards. Everwest prohibits any form of fraud, misrepresentation, or falsification of financial or business records. Employees and business partners are expected to report any concerns related to financial misconduct through the company's established reporting mechanisms.

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PROCESSING OF INFORMATION

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You must respect and protect the confidentiality of information belonging to Everwest Group, our customers, suppliers and other business partners and we expect you to be loyal to our business strategy and corporate values.

9.1 CONFIDENTIAL MATERIAL AND INFORMATION

You are not allowed to disclose any confidential or proprietary information received in Everwest Group to anyone not employed by Everwest Group. This applies during your employment in the company and for the period defined by the local law after leaving Everwest Group.

All non-public information that could be of use to competitors or harmful to Everwest Group, including our customers, suppliers and other business partners if disclosed, is confidential and proprietary information.

Confidential or proprietary information may only be disclosed to a third party strictly on a need-to-know basis unless the disclosure is required by law.

If you are not sure whether information is confidential and proprietary, and whether you are allowed to disclose it, consult with your immediate manager or senior management.

Detailed employee's confidentiality obligations are provided in the internal rules which must be strictly followed.

9.2 DATA PRIVACY

To comply with data privacy legislation, Everwest Group has issued binding corporate rules which protect collected personal data from being copied, corrupted, misused, stolen, disclosed or accessible to persons without adequate authorisation and approval.

Personal data is any personal information that can be used to identify an individual, directly, or indirectly, for example: name, photo, email address, bank details, employment information or a computer IP address, etc.

Sensitive personal data is any personal data revealing racial or ethnic origin, political opinions, religious beliefs, etc.

You must only store personal data (including sensitive personal data) on Outlook, OneDrive or personal drives for a short period of time until further processed. Follow internal procedures to process such data.

All personal data (including sensitive personal data) to be stored in the central IT system, must be forwarded or uploaded to the relevant system. When data is uploaded, the e-mail and/or data must be deleted from your personal files and Outlook.

You should only share personal data if you have a legitimate reason.

If you have any doubts about processing (storing, deleting, or sharing) personal data and sensitive personal data, consult the Everwest Group Data Protection Officer or, alternatively, senior management.

9.3 LOYAL CONDUCT

You are expected to loyally support our business strategy and corporate values and to consider the impact your actions have on our brand and avoid any damaging or derogatory communications, whether online or elsewhere.

When communicating in the public domain, in any way related to Everwest Group, directly or indirectly, it is prohibited to communicate the following:

Messages or postings, including comments or content about race, gender, disabilities, age, sexual orientation, pornography, religious beliefs and practices, political beliefs, or national origin, irrespective of whether such message or posting is disclosed on an identified or anonymous user basis

Messages or postings containing statements on any subject that could be mistakenly interpreted as the standpoint of Everwest Group

Publication of defamatory and/or knowingly false material about Everwest Group, its employees and/or customers or suppliers on social networking sites or in any other online publishing format.

This applies regardless of the platform used, irrespective of whether such activities occur online or offline, the device is private or company-owned, during or outside the office hours.

9.4 ONLINE BEHAVIOUR

Everwest Group encourages the use of social media and other online platforms for business communication and networking purposes.

When interacting on personal social media platforms, such as LinkedIn, Facebook, Twitter, etc., consider all your posts as public and avoid disclosing confidential information.

It is forbidden to post messages/statements on any subject that could be interpreted as the standpoint of Everwest Group. Clearly formulate any of your posts and comments on social media to ensure that they reflect personal views and not those of Everwest Group, unless posted by an authorised representative of Everwest Group.

Any form of fraud or piracy of copyrighted materials, such as films or music and/or commercial software or other proprietary materials is forbidden when communicating on online platforms in a way related to Everwest Group. Downloading of commercial software or any copyrighted materials belonging to a third party, unless downloading is covered by or permitted under an agreement concluded by Everwest Group, is forbidden when communicating on online platforms in any way related to Everwest Group.

ENVIRONMENTAL MANAGEMENT SYSTEM POLICY

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EVERWEST



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

Within our policies, and procedures the Ten Principles of the UN Global Compact are incorporated into the company at every level. Our focus is on getting the balance of Environmental, Social, and Governance factors right.

To ensure that Everwest Group contributes to Environmental protection and decarbonisation, we systematically develop and continuously improve our Environmental Management System (EMS).

The EMS has allowed us to identify risks and opportunities on how to improve results.

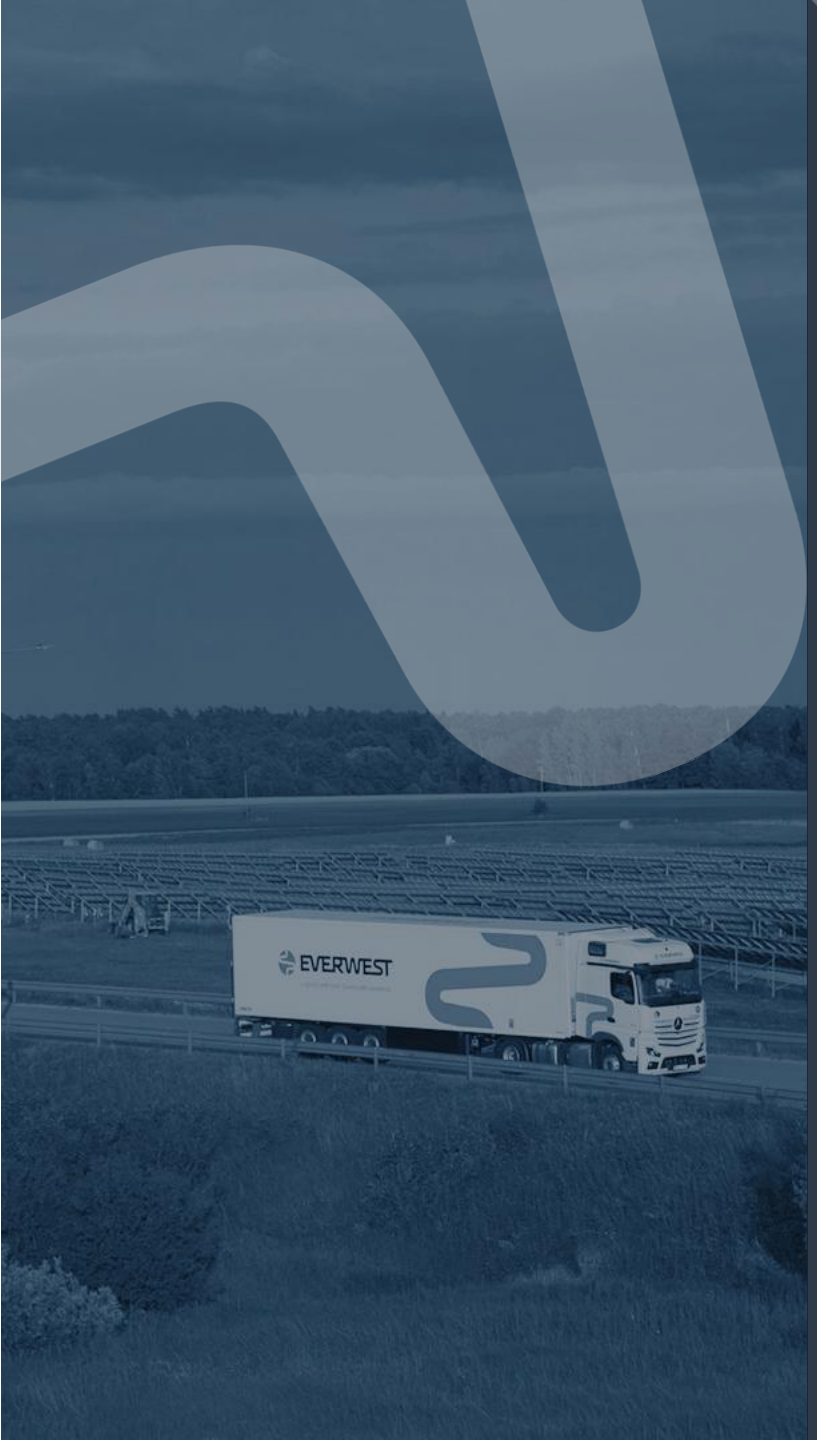
We determine our organisation stakeholders, their needs, and expectations as below:

Our EMS is prepared and certified under the ISO 14001 standard and commits to the following main goals:

- Apply green criteria for purchasing; Measure our customers' emissions and provide them with reports;
- Prevent potential environmental incidents and be ready to address any issues that do occur; Search for new green solutions for our customers' cargo transportation
- Monitor and comply with the environmental legislation and requirements of handling of chemical products in all the countries in which we operate;
- Reduce air pollution and GHG emissions;
- Build awareness by involving employees and partners in efforts to protect the environment: minimizing water consumption, foster waste reduction and the importance of recycling.
- Our responsibility to uphold animal welfare as part of our commitment to ethical business practices. We believe that all animals deserve to be treated with respect and dignity.

Our aim is to ensure that our EMS programme is applicable to all organisation activities, from local offices, production facilities, warehouses, garages, and outsourced activities, including subcontractors to all take measures towards pollution mitigation. We know that environmental impact reduction starts from measuring what it is.

EVERWEST



10.1 SUTAINABLE AND INNOVATIVE TRANSPORT AND LOGISTICS SYSTEMS

To the extent possible and whenever available, you must look for and offer sustainable and innovative transport and logistics systems that continually reduce our, our customers' and our suppliers' environmental impact, such noise, air pollution and we recognize healthy soil as a vital for sustainable, ecosystems, and our communities.

Our services should always represent our environmental considerations, and you should support our business model development and improvement.

10.2 COMPLYING WITH PUBLIC AUTHORITY REQUIREMENTS

In Everwest Group we urge our employees to lead an open and constructive dialogue with authorities, shareholders, customers, suppliers, and other stakeholders about environmental impact related to our activities.

We commit biodiversity, promoting sustainable land use practices as part of our ethical stewardship of the environment.

10.3 CAREFUL SELECTION OF SUPPLIERS

Our suppliers are selected based on the criteria formulated in the Everwest Group Supplier Code of Conduct, which is distributed to suppliers and available on www.everwest.net. The Supplier Code of Conduct describes what is considered appropriate business conduct by suppliers when they perform services on behalf of or supply services or products to Everwest Group.

You must ensure that suppliers are familiar with the Supplier Code of Conduct and take relevant steps to ensure compliance.

10.4 LAND, FOREST, AND WATER RIGHTS & FORCED EVICTION

Everwest acknowledges that land, forests, and water are vital resources for communities, ecosystems, and livelihoods. We are committed to respecting the rights of communities to access and manage these resources sustainably. Everwest does not engage in or support forced eviction, land grabbing, or the unlawful acquisition of land, water, or forest resources. All land-use or development activities will be conducted transparently, in compliance with legal frameworks, and with meaningful consultation and fair treatment of affected communities.

EVERWEST

COMPLYING WITH THE CODE OF CONDUCT

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If you need assistance or have questions or concerns about the Code of Conduct, you should first consult the person who best understands your area of responsibility: your immediate manager.

For employee (HR) related issues, e.g., concerns involving management and/ or other employees, you should contact your immediate manager and/or Human Resources representative.

Should this not be possible due to the nature of the concern, you are urged to reach out to senior management or use the Everwest Group Whistleblower Programme.

Senior management considers any breach of the principles stated in this Code of Conduct to be a material neglect of duty by the relevant employee, which may lead to disciplinary measures up to and including termination of employment and summary dismissal.

You are urged to contact either your immediate manager or senior management in case of breach or suspected breach of the principles and rules outlined in this Code of Conduct.

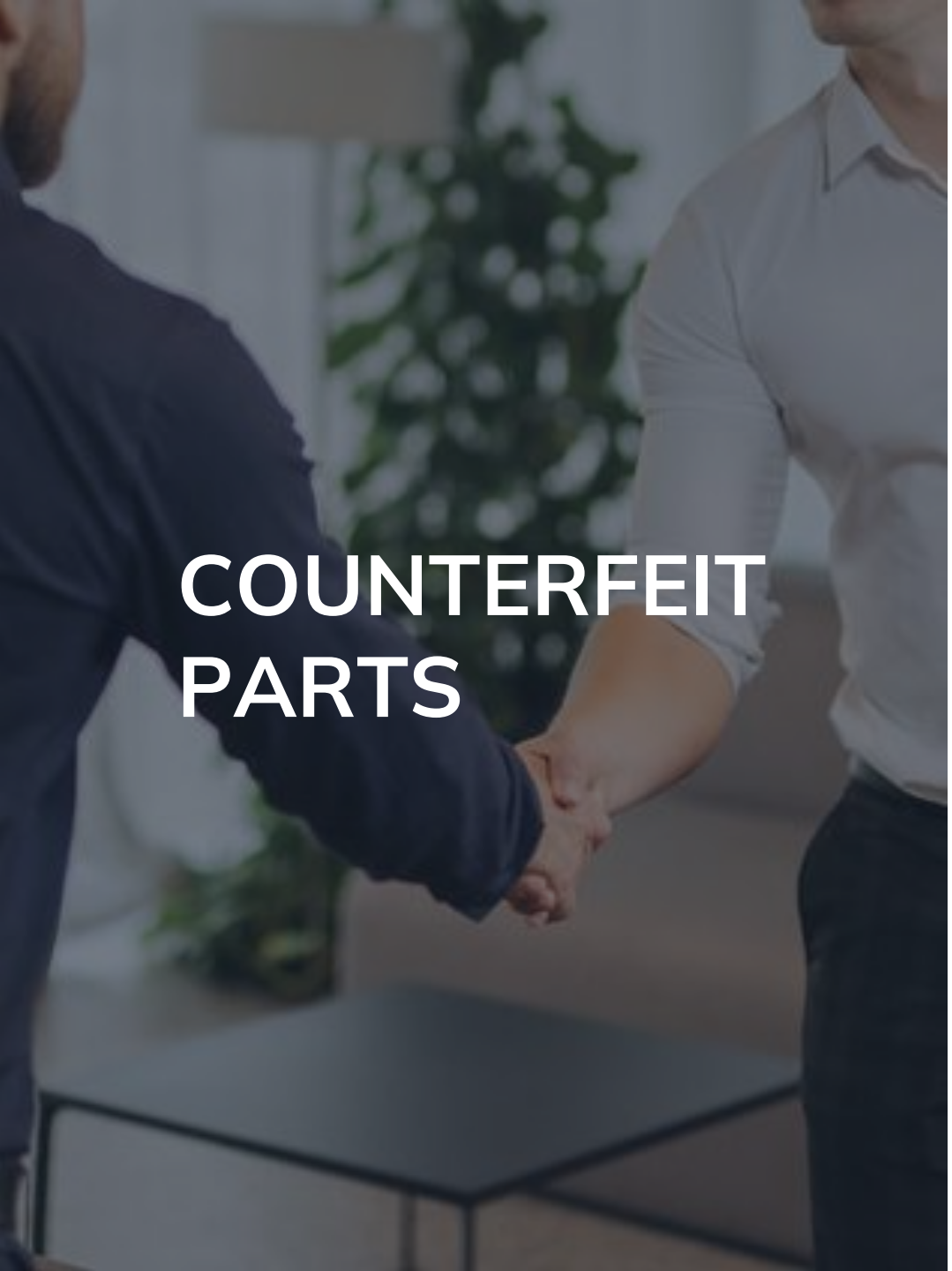
Employees can file such reports without fear of retaliation, unless they take part in the breach of policies.

If you become aware of any breaches of Everwest Group Code of Conduct, please right away inform your immediate manager, senior management or through the

Everwest Group Whistleblower Programme (by emailing signal@everwestgroup.net or anonymously calling +370 5 2177396).

This applies to cases where you have a reason to believe that a concern will not be adequately handled through other available reporting channels, or if you feel uncomfortable speaking directly to your immediate manager or have followed the normal hierarchy reporting procedure but feel that the concern was not properly acted upon.





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.

EVERWEST

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.

EVERWEST


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