ZSSK CARGO

CONNECTED BY RAILS, DRIVEN BY VALUES

Code of Conduct







This Code of Conduct represents the fundamental document outlining the values, principles, and standards of conduct for our company, operating within the rail freight sector in Slovakia. Its objective is to establish a clear direction for all employees and associates, while fostering a culture of accountability, professionalism, and transparency in all our operations.

“A partner you can rely on.”

Our mission is to provide reliable, safe, and efficient rail freight services that contribute to economic development and sustainable mobility. We strive to be a trustworthy partner for both our business partners and public institutions. Our goal is to continuously enhance the quality of our services, optimise our processes, and leverage modern technologies that drive efficiency and environmental sustainability in rail transport.

A fundamental aspect of our business is an emphasis on quality, safety, and accountability, alongside strict adherence to ethical principles across all areas of our operations. The employees of our company are responsible for ensuring that their actions comply with applicable legal regulations, internal policies, and our corporate values. We expect a similar commitment from our business partners.

Transparency, integrity, and the protection of values form the foundation of our company’s credibility. We do the right thing – even when no one is watching.

“A commitment to trust, transparency, and fairness.”

The company’s management is committed to fostering a work environment built on trust, open communication, and mutual respect. Furthermore, the management is committed to strict compliance with all applicable laws and regulations of the Slovak Republic and the European Union, as well as the company’s internal rules and processes. The management also endorses all initiatives that promote greater transparency, ethical behaviour, and responsible business practices.



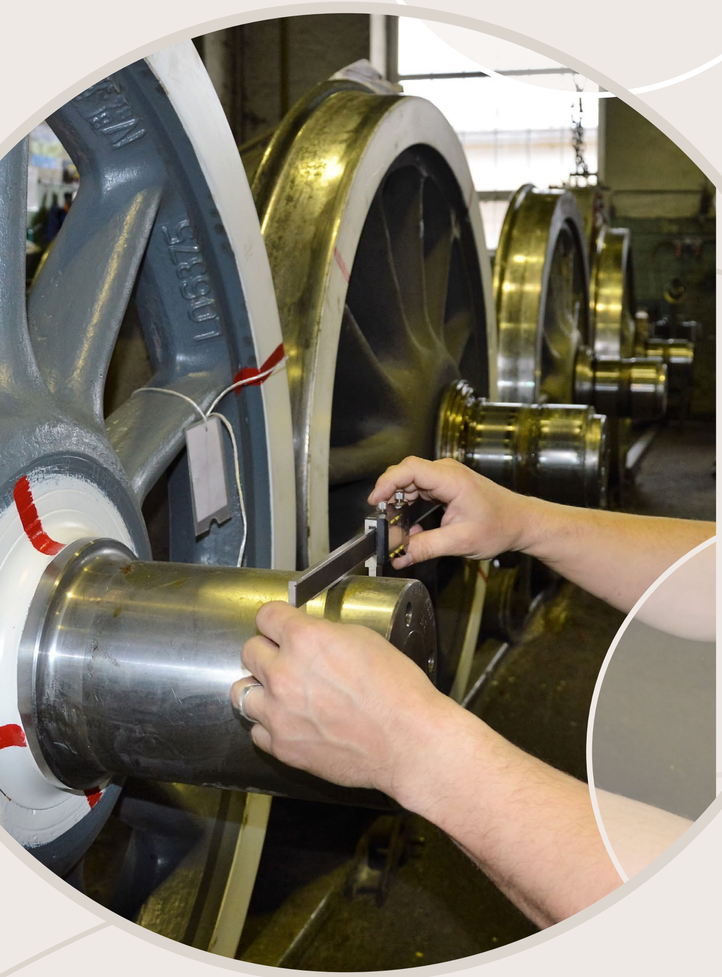
HUMAN RIGHTS

“Respect, equality, and zero tolerance for injustice.”

In our company, we respect human rights, dignity, and equal treatment. We maintain zero tolerance for illegal labour, child labour, forced labour, and modern slavery, as well as bullying, sexual harassment, and discrimination based on gender, ethnic or national origin, social status, age, disability, sexual orientation, gender identity, or religious belief.

- **Illegal labour** – we employ individuals solely on the basis of legal contracts and strictly adhere to the legislation of the Slovak Republic and the EU.
- **Child labour** – we do not employ individuals below the minimum legal working age. When employing young workers, we protect their health, prioritise their education, and ensure full compliance with all labour restrictions.
- **Forced labour and modern slavery** – all work performed within our company is strictly voluntary. We do not tolerate coercion, the withholding of personal documents, or any restrictions on freedom of movement.
- **Sexual harassment and discrimination** – we foster a respectful work environment for everyone. Any form of inappropriate behaviour – whether verbal, physical, or non-verbal – is strictly unacceptable. We do not tolerate ignoring or downplaying such behaviour.

If employees feel that their rights are not being respected, or if they face harassment, coercion, or discrimination, we will ensure an impartial and anonymous investigation of their complaint through the Ethics Committee. The Committee can be contacted via email at etickykodex@zscargo.sk.



QUALITY

“Quality is our standard.”

In our company, we believe that consistent quality is the basis of the trust our partners and customers place in us. Our Quality Management System, in accordance with the ISO 9001 standard, enables us to manage processes with precision, eliminate errors, and provide services of premium quality.

- **Customer focus** – we actively listen to our clients’ needs and tailor our solutions to not only meet but also exceed their expectations.
- **System and efficiency** – every process within our company has clearly defined rules and responsibilities, enabling us to work efficiently and without unnecessary errors.
- **Continuous improvement** – we do not view quality as a destination, but as a journey. We regularly monitor our performance and implement innovations that drive our standards forward.
- **Expertise and development** – we invest in the training of our employees, as only a qualified and motivated team can guarantee the premium quality of our services.



OHS

“Safety is our shared goal.”

Our company considers the protection of life and health to be its highest value. Our processes are designed in compliance with the international ISO 45001 standard, ensuring the systematic management of safety and the continuous improvement of the work environment.

- **Prevention** – we proactively identify and eliminate risks before accidents occur.
- **Personal accountability** – all employees are required to use the assigned personal protective equipment and strictly follow all technical procedures.
- **Right to intervene** – if an employee identifies a situation that poses an immediate safety threat, they have the right and the duty to stop work and report the risk.
- **Drug and alcohol-free workplace** – working under the influence of alcohol or other controlled substances is strictly prohibited in our company.



ENVIRONMENTAL PROTECTION

“Driving toward a green future.”

Rail transport is the key to sustainable mobility. We demonstrate our commitment to protecting the planet through our certified ISO 14001 environmental management system.

- **Emission reduction** – we continuously modernise our fleet and optimise our processes to reduce energy consumption and CO_2 emissions.
- **Waste management** – we consistently sort waste and prevent hazardous pollution during maintenance and operations.
- **Innovation** – we promote solutions that conserve natural resources and protect biodiversity around our tracks and facilities.



BUSINESS ETHICS

“Integrity without compromise.”

We make decisions based on fair and transparent criteria, such as quality, price, reliability, and long-term sustainability.

We do not accept or offer any benefits that could compromise objective decision-making or create the appearance of improper influence. This principle also applies to actions taken through third parties, such as intermediaries.

We reject corruption and all forms of unethical behaviour. Our decision-making is fair, transparent, and driven by objective criteria.

- We do not accept or offer any improper benefits.
- We make decisions independently and objectively.
- In cases of doubt, we act transparently and seek guidance.

Any suspicions of corruption or unethical behaviour can be reported to whistleblowing@zscargo.sk.



FAIR BUSINESS PRACTICES

“Fairness without exceptions.”

Fair competition is fundamental to a healthy business environment. Therefore, we avoid any agreements or practices that could distort competition or raise doubts.

It is essential not only to comply with the rules but also to avoid any conduct that could raise doubts about compliance with such rules.

- We do not engage in price-fixing agreements with competitors.
- We refrain from any form of tender manipulation.
- We do not share commercially sensitive information.



CONFLICT OF INTEREST

“Decisions without influence.”

In the course of our professional duties, situations may arise where personal interests conflict with the interests of the company. This may include, for example, relationships with business partners, outside activities, or decision-making concerning related parties.

Such situations do not necessarily entail a violation of rules – what matters is how they are addressed.

- We do not conceal such situations.
- We communicate openly.
- We take appropriate measures to maintain impartiality in our decision-making.



PROCUREMENT

“Selection without favouritism.”

Protecting the company’s values is a shared responsibility for all of us. Transparent and ethical behaviour is the foundation of our credibility with customers, partners, and the public.

When selecting partners:

- We decide objectively and without favouritism.
- We ensure equal conditions for everyone.
- We expect ethical behaviour from our partners as well.

Any attempts to unduly influence decision-making have no place in our business.



PROTECTION OF ASSETS

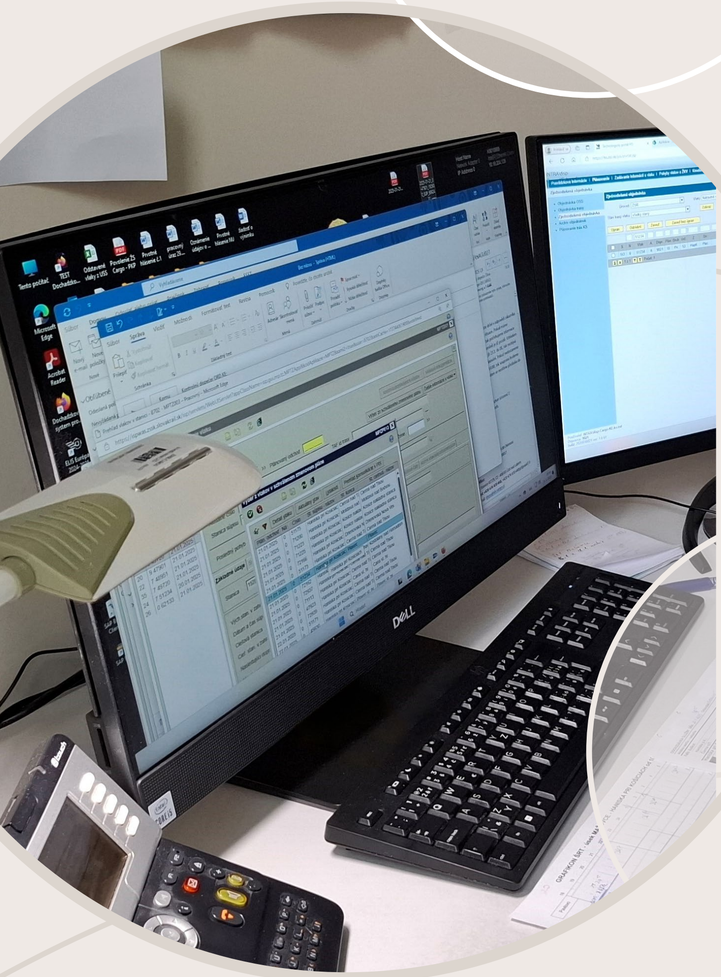
“Protecting what matters.”

Company assets, whether equipment, financial resources, information, or know-how, are intended for the fulfilment of our professional duties. Therefore, we handle them responsibly.

- We protect them from damage, loss, or misuse.
- We use them appropriately and for their intended purpose.
- We take care to protect confidential information.

We are equally committed to protecting your personal property.

Only a responsible approach from each of us ensures stability and efficient operations.



GDPR

“Your data is safe with us.”

We respect the privacy of our business partners, customers, and employees. We process personal data transparently and in accordance with applicable legislation (GDPR).

- **Confidentiality** – access to personal data is restricted to authorised personnel and only to the extent necessary for their work.
- **Systems security** – we utilise modern technological tools to protect data from misuse, loss, or unauthorised access. We monitor developments in IT and AI, continuously improving the security of our systems.
- **Integrity** – we do not use personal data for purposes other than those for which they are collected, and we retain them only for as long as necessary.



It is the shared commitment of both management and all employees to comply with this Code of Conduct. Only through a responsible approach, professional conduct, and respect for established rules can we build a stable, trustworthy, and successful rail freight company over the long term.

“Building trust on every track together.”

ZSSK CARGO

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