

CODE OF CONDUCT

This policy applies to all employees, including drivers, administrative staff, and management. It governs behaviour both on and off duty when representing the company.

General Conduct

- All employees must act professionally and respectfully towards all colleagues, clients and general public.
- Personal conduct should align with Attrans values and reputation.
- Discrimination, harassment or any form of misconduct will not be tolerated.
- Any form of bullying, violence or threats will not be tolerated.
- Employees shall comply with all local, national and European regulations governing transportation and logistics.
- Employees are expected to keep common areas tidy and to clean up after themselves when using kitchen or bathroom facilities.
- Employees must ensure that their workstation is kept neat, clean, and tidy, especially at the end of the day when cleaning takes place. Laptops and other valuables must be locked away or otherwise secured overnight.

Ethical Conduct & Integrity

- Attrans employees are expected to be honest and transparent in all business activities.
- Any form of fraud, theft or dishonest behaviour is strictly prohibited.
- Employees must not accept bribes, gifts and/or favours that could compromise integrity.
- Conflicts of interest must be disclosed to management.



Please consider the environment before printing POL01 R1 240425



CERTIFICATE No. ATTR1109Q1401

Vat Reg No. MT 1008-1809 - Company Reg. No. C-8520

OFFICES IN MALTA - ITALY - THE NETHERLANDS

f in

All transactions handled in accordance with CMR conditions.

All business is transacted in accordance with the MIFA standard trading terms and conditions which can be viewed on our website at www.attrans.com

1. ANTI BRIBERY & CORRUPTION POLICY

Attrans Ltd is engaged in the road transport of various goods including specialised cargo such as pharmaceuticals, foodstuffs and dangerous goods providing this service in Malta and mainland Europe. In line with the company ethos and values, Attrans commits to conducting business ethically and with full integrity, and shall ensure that this policy applies to all management, employees, partners and contractors.

Attrans Ltd's integrity is founded on the below principles:

1.1 Prohibited Payment

- No employee may propose, offer, give, promise or receive money, or anything else of value, to or from an individual or entity in the private or public sector in order to obtain an improper advantage.
- If you are offered a gift or hospitality of any kind valued at €75 or over, please request authorization to accept this from the Managing Director.
- Genuine hospitality or promotional expenditure which is proportionate and reasonable given our business, is permitted, and must be approved by the Managing Director if over €100 in total value. This can include: taking clients to dinner, offering gifts to clients as a reflection of our good relations, or paying for reasonable travel expenses in order to demonstrate our goods or services to clients. Any such expenditure must be authorized by the Managing Director.
- No employee may propose, offer, promise and authorise the issuing of money, or anything else of value, to a government official in order to secure an improper advantage.
- Such prohibition covers cash payments, benefits, gifts, entertainment, favours, covering of travel expenses and educational services.

1.2 Charitable Donations

Attrans supports contributions to the communities and permits reasonable donations to established charities, institutes and sponsorships. In this respect:

- Reasonable steps must be taken to verify that any such contribution does not constitute an illegal payment to a government body or official or any individual in violation of this policy.
- It may be permissible to make donations directly to a government agency (rather than to an individual government official) as part of a charitable effort or to promote goodwill through actions such as providing free services for a government-sponsored celebration.



Please consider the environment before printing POL01 R1 240425



CERTIFICATE No. ATTR1109Q1401

1.3 Facilitating Payment

- Attrans does not allow the use of facilitating payments. Employees and third parties are prohibited from making facilitating payments on Attrans' behalf.
- Under exceptional circumstances, i.e. when an employee's safety is at risk, a facilitating payment may be permissible.
- When such a payment has been made, a report will be filed by the Management System Coordinator recording all information including reason related to this payment transaction.

1.4 Accounting & Payment Practices

- In order to prevent the possibility of bribes and kickbacks being paid or accepted, all Attrans business and financial records must fairly and accurately reflect each transaction involving the company's business.
- Secret, unrecorded or unreported transactions are prohibited.
- All expenses must be accurately accounted for, include appropriate supporting documentation and be promptly entered into company records before they are reimbursed.

1.5 Discipline

- Attrans understands that the company and its employees can be investigated by government regulators in different jurisdictions and, depending on the circumstances, prosecuted administratively, under civil law or under criminal law, which could result in severe fines, penalties and imprisonment if a violation of applicable anti-bribery and corruption laws and regulations is established.
- Any employee found to be in violation of this policy will be subject to disciplinary action, up to and including termination of employment, in accordance with applicable laws and company policies.
- Agents, suppliers, service providers, consultants and other third parties working for Attrans who are found to be in violation of this policy will be subject to termination of the business relationship as well as any other legal and remedial actions available to Attrans under applicable law.

1.6 Compliance and Reporting Breaches/Issues

- It is the responsibility of all employees to ensure compliance with this policy.
- Any employee who witnesses a breach of this policy or suspects that this policy has been breached is obliged to promptly contact the Management System Coordinator.



Please consider the environment before printing POL01 R1 240425



European Certification Institute
QUALITY MANAGEMENT SYSTEMS
ISO 9001:2008 CERTIFIED
CERTIFICATE No. ATTR1109Q1401

Management ensures that this Policy is communicated to all Attrans people and monitors behaviours and business activities to ensure that policy objective is achieved. With the implementation of these internal controls, Attrans assures an ethical business approach with all interested parties.

2. SAFETY & COMPLIANCE

- Drivers must strictly adhere to traffic laws and company policies regarding vehicle operations (Ref Driver's Manual)
- Use of drugs, alcohol or any intoxicating substances is strictly prohibited.
- Vehicles must be maintained in proper working conditions, and any issues must be reported immediately (Ref Driver's Manual)

3. DRUG POLICY (MARIJUANA AND/OR CONTROLLED SUBSTANCES)

Illegal, addictive, dangerous, or controlled substances are not allowed in any part of the premises and during transport. Possession of drugs or drug paraphernalia, use, manufacture, distribution, or sale of illegal drugs is prohibited. Persons found in a room where drugs are being used or present are subject to disciplinary action whether or not they were engaging in such behaviour. In any case, the local Police will be called to the scene if there is a suspicion of drug use in the premises. If you are aware of any colleagues involved in illegal activity, you are advised to contact the Managing Director.

4. ALCOHOL POLICY

Attrans offices and vehicles are considered substance-free environments. All employees (including drivers), regardless of age, are not permitted to consume or possess alcoholic beverages in any part of the office or on the tractor units. Any alcohol found will be destroyed and disciplinary sanctions will be imposed. The presence of full or empty alcoholic beverage containers (bottles, cans, and cases) is prohibited. Severe sanctions, including the possibility of immediate employee dismissal, are imposed upon employees who provide alcohol to others, or possess large quantities of alcoholic beverages, even if there are no prior sanctions on record.

 Please consider the environment before printing POL01 R1 240425



5. REASONABLE SUSPICION TESTING OR REASONABLE CAUSE:

It is the discretion of management to conduct drug tests on earmarked 'suspect' employees to ascertain good behaviour and consistent work ethic without jeopardising the company's operation, image and the employees' welfare. The Managing Director may take the necessary action in cases where suspicious situations warrant so:

- **Observable Symptoms or Unusual Behaviour.**
- **The Odour or Smell of Alcohol or Drugs on the employee's breath or clothes or in an area (such as in a vehicle, office, work area, or restroom) immediately controlled or occupied by the employee.**
- **Alcohol, alcohol containers, illegal drugs or drug paraphernalia in the employee's possession or in an area controlled or occupied by the employee (vehicle, office, desk restroom).**
- **Unexplained or Significant deterioration in job performance.**
- **Unexplained significant changes in behavior (e.g. abusive behavior, repeated disregard of safety rules or procedures, insubordination, etc.).**
- **Criminal citations, arrests or convictions involving drugs and alcohol.**
- **Unexplained absenteeism or tardiness.**
- **Employee admissions regarding drug or alcohol use.**
- **Any involvement in any work-related accident or near misses.**

6. DUTY TO COOPERATE

An employee who fails to cooperate in the administration of this policy generally will be terminated. This includes such things as:

- **Refusing to consent to testing, to submit a sample, or to sign required forms.**
- **Refusing to cooperate in any way (for example, refusing to courteously and candidly cooperate in any interview or investigation, including any form of truthfulness, misrepresentation or misleading statements or omissions.)**
- **Any form of dishonesty in the investigation or testing process.**
- **Refusing to test again at a time of the Company's choosing whenever any test results in a finding of a dilute sample or reasonable suspicion.**



Please consider the environment before printing POL01 R1 240425



7. SMOKING POLICY

Attrans offices are smoke free. Therefore, the use of tobacco, including smokeless tobacco products, and legal smoking products are prohibited in all offices as per The Tobacco Control Act and Legal Notice 414 of 2004 (Smoking in Premises Open to the Public Regulations, 2004).

8. QUALITY POLICY

Attrans Ltd is engaged in the road transport of various goods including specialised cargo such as pharmaceuticals, foodstuffs and dangerous goods providing this service in Malta and mainland Europe. Attrans Ltd is fully committed towards achieving and enhancing customer satisfaction by fostering effective systems that allow our people to understand what the customer wants and redeem these requirements into an above-average service that the customer deserves.

Attrans Ltd has established and is committed to maintain an effective and robust Quality Management System by:

- Allocating financial and human resources to enable an effective service.
- Training and continuously developing our people to enhance competence.
- Maintaining effective communication with all our customers.
- Ensuring that service quality is maintained at all times.
- Obtaining and acting upon customer feedback.
- Continually improving the effectiveness of the system.

Attrans Ltd embraces and values customer focus, patient care and food safety, and ensures that these are the guiding principles to our people.

We commit to comply with the requirements of ISO 9001:2015, HACCP and EU GDP Guidelines as well as established documented policies and procedures.

Management ensures that this Policy is communicated to all Attrans people and monitors organisational performance to ensure that set objectives are achieved.



Please consider the environment before printing POL01 R1 240425



Vat Reg No. MT 1008-1809 - Company Reg. No. C-8520

OFFICES IN MALTA - ITALY - THE NETHERLANDS

All transactions handled in accordance with CMR conditions.
All business is transacted in accordance with the MIFA standard trading terms and conditions which can be viewed on our website at www.attrans.com

9. FOOD SAFETY POLICY

Attrans Ltd is engaged in the road transport of various goods including specialised cargo such as pharmaceuticals, foodstuffs and dangerous goods providing this service in Malta and mainland Europe. In line with the Quality Policy, Attrans Ltd is fully committed to deliver food products safely to its clients.

Attrans Ltd has established and is committed to maintain an effective and robust Food Safety Management System by:

- Complying with all relevant statutory and regulatory requirements of food safety legislation and company and customer requirements
- Providing adequate resources, including a food safety team leader (represented by the Quality Manager), and expert advisors as required, to fulfil the Company's commitments.
- Conducting regular reviews to monitor performance, producing plans for improvement, and reporting against set targets and objectives.
- Promoting a culture of food safety awareness and responsibility through communication.
- Maintaining effective communication with all our customers.
- Continually improving the effectiveness of the system by identifying root causes of failures to prevent recurrences.

We commit to comply with the requirements of the internationally recognised system of Hazard Analysis Critical Control Points (HACCP) and local legal requirements as well as established documented policies and procedures.

Management ensures that this Policy is communicated to all Attrans people and monitors organisational performance to ensure that set objectives are achieved.

With the implementation of these internal controls, Attrans assures a food safe delivery to all our clients.



Please consider the environment before printing POL01 R1 240425



CERTIFICATE No. ATTR1109Q1401

Vat Reg No. MT 1008-1809 - Company Reg. No. C-8520

OFFICES IN MALTA - ITALY - THE NETHERLANDS

f in

All transactions handled in accordance with CMR conditions.

All business is transacted in accordance with the MIFA standard trading terms and conditions which can be viewed on our website at www.attrans.com

10. HEALTH & SAFETY POLICY

Health and safety are an integral part of Attrans' operation and a prime responsibility of management at every level. We shall provide and maintain safe and healthy working conditions, in particular ensuring, so far as is reasonably practicable that:

- We comply, as a minimum, with all relevant legislation and codes of practice.
- We adopt and promote best practice in all aspects of health, safety and welfare.
- Places of work including transport vehicles are kept in a clean and safe condition.
- We endeavour to improve continually our health, safety and welfare management system so that accidents and ill health are minimised.
- Work equipment including transport vehicles is provided and maintained in a safe condition through periodic maintenance and cleaning.
- We involve and consult with employees, where appropriate, through their representatives.
- We require subcontractors who work for us to accept the same standards of health and safety as Attrans Ltd.
- Health and safety factors are given proper consideration when any changes are made to our operation or when new equipment or substances are used.
- We implement monitoring, inspection and auditing procedures to ensure the effective management of health, safety and welfare within Attrans Ltd.

We shall encourage all stakeholders including employees, contractors and visitors to be actively involved in maintaining the safest possible operating conditions and practices to ensure we uphold the highest possible standards of health and safety.



Please consider the environment before printing POL01 R1 240425



Employees must comply with the health and safety rules and procedures relating to their jobs. Both the Company and the Employee shall abide by the regulations and provisions of the Occupational Health and Safety Authority Act 2000, Chapter 646 of the Laws of Malta.

11. ENVIRONMENTAL POLICY

Attrans Ltd is a leading transport company operating a trailer fleet in the European and North African markets. We are aware of the effect of our operations on the environment and are committed to minimise all impacts by means of a program of continual improvement.

Attrans' environmental policy provides a framework for setting and reviewing environmental objectives and targets.

We aim to:

- **Comply with all relative legislation, transportation regulations and Codes of Practice.**
- **Follow appropriate Codes of Practice and best practice in the handling and transportation of hazardous materials according to ADR requirements.**
- **Conserve natural resources and set objectives and targets to reduce the consumption of these resources.**
- **Show a commitment to prevent the risk of pollution and harmful emissions which our activities may impact on the environment by investing in modern transport technology (currently transitioning to Euro 6 engine tractor units).**
- **Reduce waste by making use of electronic means and the recycling of paper in the office block.**
- **Maintain the environmental management system according to the requirements of global standards.**
- **Increase staff environmental awareness through training.**
- **Communicate the policy to all personnel and members of the public.**
- **Regularly review our performance to ensure we are meeting our environmental objectives and targets.**

 Please consider the environment before printing POL01 R1 240425



12. PROTECTING OUR ASSETS - IT & SECURITY

Employees must use company tools and equipment responsibly and take proper care of all property. When taken offsite, company assets must be kept secure and never left unattended or visible in vehicles. Laptops and mobile devices must not be left unattended in the office and should only be accessible to their assigned owner. Employees are required to follow the **Clean Desk, Clean Screen Policy**. Workstations should be left clear of sensitive documents at the end of the day, and screens must be locked whenever unattended to prevent unauthorised access. Online activities must not interfere with job performance. Excessive use of non-work-related communication during working hours will be addressed. Company information must not be stored on personal computer hard drives, as this is outside the company's back-up system and could be lost or accessed by unauthorised persons in the event of theft or damage. Any lost equipment or suspected compromise of passwords must be reported immediately to the IT department.

13. SOCIAL MEDIA POLICY

13.1. Acceptable Use

- Drivers may use social media during breaks or personal time, as long as it does not interfere with their duties.
- Use of social media while driving is strictly forbidden, even at traffic lights (in line with road safety laws).
- Personal opinions should not be presented as company views.

13.2. Content Restrictions

- Employees shall not post photos of customer sites, goods, or trailers with visible labels unless approved.
- Drivers never share information about routes, loads, delivery times, or customer names.
- Employees shall avoid express negative or inappropriate comments about the company, colleagues, or clients.

 Please consider the environment before printing POL01 R1 240425



13.3. Use of Company Devices

- Social media apps may be permitted on company phones only if authorized.
- The company reserves the right to limit or monitor usage during work hours.

13.4. Privacy and Confidentiality

- Employees shall never post confidential company information.
- Drivers must respect the privacy of colleagues, clients, and the company at all times.

13.5. Disciplinary Measures

- Breach of this policy may result in disciplinary action, including warnings or dismissal, depending on the severity.

"Think Before You Post"

- "Would I say this in a meeting in front of my manager?"
- "Could this put someone at risk or harm the company's image?"

"This policy is intended to ensure responsible use of social media and to protect both the employee and Attrans Ltd. It does not restrict personal use outside of working hours but sets expectations when representing the company or using company property."



Please consider the environment before printing POL01 R1 240425



14. CUSTOMER SERVICE

- All employees must provide professional and respectable service to all clients.
- Customer confidentiality must be maintained at all times.
- Communication, including complaints, should be clear and prompt.
- Issues and complaints are to be handled as per documented procedures (Ref QPM06)

15. HUMAN RIGHTS & EQUAL OPPORTUNITIES

- Attrans is committed to respecting internationally recognised human rights and to ensuring dignity and fairness in the workplace.
- All employment practices, including recruitment, training, promotion, and compensation, are based on merit, qualifications, and performance.
- Discrimination or harassment on the basis of race, colour, gender, age, religion, disability, sexual orientation, nationality, or any other protected characteristic will not be tolerated.
- We are dedicated to promoting an inclusive work environment where diversity is valued and employees are provided equal opportunities to grow and succeed.
- All employees are expected to uphold these principles in their daily conduct and to report any concerns through the company's grievance or reporting channels.

16. GENERAL DISCIPLINARY PROCEDURE

Disciplinary Procedure

Attrans aims to encourage improvement in conduct and performance through fair and consistent procedures. Disciplinary action will only be taken after the facts have been fully investigated and the employee has been given the opportunity to respond. Depending on the seriousness of the matter, disciplinary measures may include written warnings, final warnings, or dismissal as explained below. In cases of gross misconduct, dismissal without notice may apply. Employees have the right to be accompanied at meetings and to appeal against any decision.



Please consider the environment before printing POL01 R1 240425



CERTIFICATE No. ATTR1109Q1401

Stage 1 – first warning

If conduct or performance is unsatisfactory, you will be given a written warning or performance note. You will be informed that a final written warning may be considered if there is no sustained satisfactory improvement or change. Where the first offence is sufficiently serious, for example because it is having, or is likely to have, a serious harmful effect on the Company, it may be justifiable to move directly to a final written warning.

Stage 2 – final written warning

If the offence is serious, or there is no improvement in standards, or if a further offence of a similar kind occurs, a final written warning will be given which will include the reason for the warning and a note that if no improvement results within a specified time, action at Stage 3 will be taken.

Stage 3 – dismissal or action short of dismissal


If the conduct or performance has failed to improve, you may suffer demotion, disciplinary transfer, and loss of seniority or dismissal.

Gross misconduct

If, after investigation, it is confirmed that an offence of the following nature has been committed, (the list is not exhaustive), the normal consequence will be dismissal without notice or payment in lieu of notice.

- Theft or fraud,
- Physical violence or bullying,
- Deliberate and serious damage to property,
- Serious misuse of Company property or name,
- Deliberately accessing internet sites containing pornographic, offensive or obscene material engaging in email, online chat or other form of communication which is of an offensive, obscene or disrespectful nature,
- Serious insubordination,
- Unlawful discrimination or harassment,
- Bringing the Company into disrepute,
- Serious incapability at work brought on by alcohol or illegal drug use,
- Causing loss, damage or injury through serious negligence,
- A serious breach of health and safety rules,
- A serious breach of confidentiality

While the alleged gross misconduct is being investigated, you may be suspended, during which time you will be paid your normal pay rate. Any decision to dismiss will be taken by the Company only after full investigation.

 Please consider the environment before printing POL01 R1 240425

Employees should report any misconduct or violations of this Code to management via the Management System Coordinator.

Violations of this Code of Conduct may result in disciplinary action, including verbal warnings, written warnings, suspension, or termination. Serious violations may lead to legal consequences.

Management ensures that this Policy is communicated to all Attrans people and monitors behaviours and business activities to ensure that policy objective is achieved.

With the implementation of these internal controls, Attrans assures an ethical business approach with all interested parties.

Approved by:

Philip J Attard (Managing Director)



Please consider the environment before printing POL01 R1 240425

