



APROJECTS CODE OF CONDUCT



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Aprojects

1. Introduction

1.1 The Aprojects History

Founded in 2005, Aprojects profiles itself as a global logistics service provider with comprehensive turnkey solutions for complex logistics supply chains. The company's innovative approach is supported by a range of services and an international presence. For example, Aprojects provides the energy and transportation sectors with creative logistics solutions while meeting sustainability goals. As a result, Aprojects, offers end customers significant added value, including significant logistics benefits for their global procurement, efficiency gains and reduced operational costs. Aprojects' vertically integrated turnkey solution unites all critical supply chain elements to provide international customers with a "tailor-made" service.

The company is now using its know-how, modular logistics architecture to rapidly expand into other key markets, such as zero-emission transportation solutions.

1.2 Our mission

To deliver seamless, efficient and innovative logistics solutions worldwide. We take pride in our creative mindset thinking and we ensure timely and secure movement of projects. Our mission to optimize warehouse capabilities, fostering sustainable practices and contributing to the success and growth of our clients and partners in the global market.

This mission combines elements of service excellence / innovation and sustainability, aiming to provide a clear direction for the company's strategies and operations.

In terms of sustainability we commit to minimize our environmental impact by investing in green technologies and optimizing our operations and warehouses to reduce our carbon footprint. Thereby contributing to a sustainable future for our planet.

1.3 Values

1) Think Big

Being a global service provider, our platform requires unrivalled vision, innovation and execution. We never settle — in everything we do, we challenge our ideas of what's possible in order to better meet the needs of our customers

2) Thrive Together

Greatness comes from unlocking each other's potential. We believe that seeking and giving feedback are essential for us to learn; we want to inspire each other to achieve great things. We unite to deliver results for our company and customers.

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3) Engage Fearlessly

We speak up and listen.

We bring passion and energy to work, knowing that active participation is essential to create better outcomes. We value those who speak thoughtfully, encourage and respect diversity of opinion and listen carefully with an open mind.

1.4 Goals of our Code of Conduct

- 1) To demonstrate our professionalism and responsibility that comes with timely service, flexibility and quality improvement.
- 2) To ensure that all members are treated with respect and dignity, regardless of their background, beliefs or identity.
- 3) To prevent conflicts and misunderstandings by outlining acceptable behaviors and expectations.
- 4) To grow as a company by evolving and reflecting over time
- 5) To implement and to make aware of the respectful and effective communication
- 6) To observe applicable legal regulations in all regions and countries in which we operate
- 7) To prioritize the safety of employees, clients and assets.

2. Code of Conduct

2.2 Code of Conduct: Why?

It is our policy to ensure that everyone respects and follows the rules at all times. To do so the importance of Code of Conduct can not be overseen. It serves as a guideline that governs the behavior and interactions of individuals within Aprojects. It serves as a moral compass not only for employees but also for directors and managers. Last but not least, Code of Conduct plays a crucial role in promoting a positive and respectful environment which will guide Aproject into the future.

2.3 Various areas

Code of Conduct covers various areas which Aprojects has adopted to ensure that employees can build trust, respect, and a sense of evolution within the company, set forth below.

2.3.1 Conflicts of Interest

Aprojects prohibits conflicts of interest. A “conflict of interest” can arise when an individual’s personal interests clash with the interests of Aprojects, which results in inability to perform the work objectively and effectively. For example, family ties of an employee, officer or director which lead to improper personal benefits. Conflict may also arise if an employee, officer or director has a partnership or a role in an organization that competes against Aprojects.

If such an irregularity is noticed or if an employee, officer or director may have a question regarding the conflict/potential conflict, he or she should consult with the Compliance Officer.

2.3.2 Anti-corruption and anti-bribery

Corruption is an action that causes harm, undermines ethical values and jeopardizes the reputation of our company. We do not tolerate such a misconduct. Therefore it is strictly prohibited to, on behalf of Aprojects, promise to pay or accept payments which result in an improper benefit for the company.

We make sure that each employee, manager, director has received proper introduction to our Anti-Corruption Policy which stipulates the purpose thereof, preventive measures which help to avoid such irregularities and consequences in case of violation. By embracing this policy, we not only protect our reputation, but we also maintain the trust of our clients.

2.3.3 Gifts, Donations and Other Benefits

We acknowledge that gifts and entertainment can be acceptable in business, but they must be reasonable, transparent, and comply with relevant laws and regulations.

2.3.4 Equal Opportunity, Discrimination and Harassment

Aprojects is committed to providing a work environment that is free from discrimination, harassment, and promotes equal opportunity for all employees regardless of their race, color, religion, age, sexual orientation, nationality, disability or any other characteristic protected by law.

But what are Discrimination and Harassment?

- a. Discrimination: An unfair or adverse treatment of individuals in any aspect of employment, including hiring, promotion, compensation and termination, based on any protected characteristic.
- b. Harassment: Unwelcome conduct, verbal or physical, that creates a hostile, intimidating, or offensive work environment based on any protected characteristic.

2.3.5 Compliance Procedure

To ensure that the Code of Conduct as well as all our policies are followed and are aligned with the relevant laws and regulations, it is a must to have Compliance Procedures. That way we will keep a track on our ethical conduct, transparency, and accountability. That way Aprojects makes sure that the risks are minimized and the trust is build not only internally, but also to the outside world.

We conduct regular reviews to ensure that the Code of Conduct remains up-to-date and aligned with changing regulations.

2.3.5.1 Training

For the maximum compliance with the rules of the Code of Conduct, we make sure that once in a while a training for employees would be provided. That way we ensure that everyone is well-informed about our policies and procedures plus is the personnel of Aprojects up to date on any changes which may occur in the Code of Conduct. In addition, the updated version thereof can always be found on our website.

2.3.5.2 Monitoring

To prevent the breaches of our Code, we regularly monitor our operations. This includes daily data analysis, internal audits, external audits, performance evaluations.

2.3.5.3 Reporting and Corrective actions

Aprojects places a lot of emphasis on Incident Management. Which means that all incidents concerning compliance violations must be reported. The reporting can be addressed to the legal department, senior management and in all cases the Compliance Officer.

The Compliance Officer will investigate the reported violations with the parties involved and prepare a report for the senior management. Once the cause and how it happened has been determined, the necessary corrective actions will take place, which may include:

- Disciplinary measures : may range from a written or verbal warning to termination of the employment;
- Process improvements;
- Policy revisions: which may be the case for example if the cause of the incident was due to unclear interpretations of the policies in the eyes of the employee.

The severity of a corrective action will be determined by the senior management (in consultation with the legal counsel and the employee's supervisor).

2.3.6 Environment, Health & Safety Policy

Aprojects is committed to comply with all relevant health and safety regulations as described in our Quality, Health, Safety and Environment Policy.

We believe that a safe and healthy workplace not only protects our employees but also contributes to their well-being, job satisfaction, and overall productivity.

2.3.7 Data Protection

All of the Aproject's customers may rest assured that all the personal information that is collected in connection with the operational assignments, is secured by our Data Protection Management System in which the key components are abiding with the local law as well as our own Data Protection Policy.