

POLICY FOR REPORTING VIOLATIONS

Purpose	The Policy for Reporting Violations (hereinafter referred to as the "Policy") establishes the process for submitting, receiving, evaluating, and making decisions regarding reports of potential, ongoing, or committed violations within CargoGo Logistics, UAB.
Scope	<p>This Policy applies when:</p> <ol style="list-style-type: none"> 1. Reports of violations are received through the internal reporting channel according to this Policy. 2. Reports of violations are received through the internal reporting channel as per the Equal Opportunities, Non-Discrimination, Violence, and Harassment Prevention Policy. <p>The internal reporting channel at CargoGo Logistics, UAB is accessible to any person who has or had an employment relationship, contractual relationship, or pre-employment relationship with CargoGo Logistics, UAB.</p>
Implementation	This Policy is reviewed and updated once a year or as needed.

I. SPECIAL TERMS

Information about a Violation	This Policy is reviewed and updated once a year or as needed.
Violation	A potential, ongoing, or committed criminal offense, administrative offense, or breach of work duties within CargoGo Logistics, UAB. This includes serious violations of professional ethics, or any other legal infringement posing a threat to public interest, including violations related to gender equality, direct or indirect discrimination, violence, and harassment in the workplace. The person reporting the violation must have obtained this information through their past or current employment, contractual relationship, or pre-employment relationship with CargoGo Logistics, UAB

II. REPORTING VIOLATIONS

1. Reports of violations may be submitted regarding:
 - Public safety or health threats
 - Threats to an individual's life or health
 - Obstruction or unlawful influence on law enforcement investigations or judicial proceedings
 - Illegal financial activities
 - Misuse of public funds or assets
 - Illegally acquired assets
 - Corruption, money laundering, or unfair competition
 - Concealment of violations or obstruction of assessing their impact
 - Child labor or forced labor
 - Discrimination based on gender, race, nationality, citizenship, language, social status, beliefs, age, sexual orientation, disability, ethnicity, marital or family status, intent to have children, political party membership, trade union affiliation, religious beliefs, or other protected grounds
 - Inequality in gender-related workplace policies
 - Unequal opportunities and working conditions based on protected characteristics
 - Violence (long-term, short-term), threats of violence, sexual harassment, verbal harassment, stalking, and physical violence in the workplace or during work-related activities

- Unequal pay for equal work of the same value
 - Breach of confidentiality
 - Other violations
2. A person can submit a report of a violation to CargoGo Logistics:
 - Directly via email at trust@cargogo.eu
 - By filling out an online form on the CargoGo Logistics website
 3. Reports must be submitted in writing using the CargoGo Logistics-approved form or in free format. If submitted in free format, the report should include:
 - Who committed, is committing, or is preparing to commit the violation
 - The date and circumstances of discovering the violation
 - The name, surname, personal code, employer, and contact details of the reporting person
 - Any supporting documents or evidence
 - A statement that the report is submitted in accordance with this Policy
 4. The CargoGo Logistics management may decide to investigate anonymous reports.

III. RECEIVING AND REGISTERING REPORTS

5. Reports sent to trust@cargogo.eu are received and registered by a designated responsible employee. If the report is submitted directly to the company's management, the management forwards it for registration.
6. Reports received at any email address other than trust@cargogo.eu are not registered and must be forwarded immediately to trust@cargogo.eu. The original email must then be deleted within one business day.
7. If a report is received via mail, the responsible employee ensures it is forwarded for registration.

IV. EVALUATION OF REPORTS AND DECISION-MAKING

8. The responsible employee evaluates all reports received.
9. After assessing the report, the responsible employee may:
 - Decide to investigate the report.
 - Forward the report to law enforcement or regulatory authorities within two business days if a crime or administrative offense is suspected. The reporting person will be informed of this action.
 - Decide to dismiss the report if:
 - It does not meet the requirements of this Policy and the reporting person fails to clarify it.
 - The report contains clearly false information.
 - The report has already been reviewed or is under investigation.
10. Within ten business days of receiving a report, the responsible employee informs the reporting person about the decision taken. If the report is dismissed, the decision must be justified.
11. If the report concerns discrimination based on gender, race, nationality, language, social status, beliefs, age, sexual orientation, disability, ethnicity, or religion, it is presumed that discrimination, harassment, or an instruction to discriminate has occurred unless proven otherwise by the accused party.
12. Reports must be submitted within one month of the alleged violation or its discovery.
13. Investigations should be completed within one month of receiving the report. If the case is complex, this period may be extended to two months, with written notification to the reporting person.
14. After completing the investigation, the responsible employee informs the reporting person about the outcome and any actions taken or planned. If a violation is confirmed, the reporting person is informed of the disciplinary measures imposed on the violator.
15. If a reporting person faces retaliation due to submitting a report, they may consult the responsible employee for advice on legal remedies.
16. If the reporting person does not receive a response or if no action is taken by CargoGo Logistics, they have the right to escalate the matter to a competent national authority.

V. RESPONSIBLE EMPLOYEE

17. The company's management appoints a responsible employee to manage the internal reporting system. The responsible employee must have a good reputation and appropriate qualifications to ensure proper implementation of this Policy. No one may interfere with the responsible employee's duties.
18. The responsible employee:
 - Investigates reports received through the internal reporting channel.
 - Ensures confidentiality.

- Cooperates with other departments and regulatory authorities.
 - Collects anonymized statistical data on reports and their outcomes.
 - Exercises the authority to request information from employees and departments.
19. The reporting Policy is published on the company's internal network.

VI. CONFIDENTIALITY

20. From the moment a report is received, the responsible employee ensures its confidentiality. Only authorized persons may access the information.
21. Confidentiality is maintained regardless of the investigation outcome.
22. Confidentiality is not required if the reporting person explicitly requests disclosure or if the report is knowingly false.
23. Disclosure of the reporting person's data to pre-trial or investigative authorities is not considered a breach of confidentiality.
24. CargoGo Logistics management and employees handling reports must maintain the confidentiality of all involved parties, except as required by law.

VII. FINAL PROVISIONS

25. No negative actions shall be taken against a person who has reported a violation from the day the information is submitted. Such actions include dismissal, demotion, transfer to another position, persecution, intimidation, harassment, discrimination, threats, career limitations, salary reductions, schedule changes, questioning of competence, spreading negative information to third parties, or any other form of retaliation. Confidentiality is maintained regardless of the investigation outcome.
26. If necessary or upon request, the person who reported the violation may be provided with assistance, such as access to professional services or reassignment to another position. Employees who have experienced violations as defined in Sections 1.11 – 1.15 of the Policy are offered free psychological support through emotional support hotlines.
27. Retaliation is also prohibited against family members of the person who reported the violation if they are employed by CargoGo Logistics or any related legal entity with subordinate ties to CargoGo Logistics, where such family members may suffer negative consequences due to the report.
28. A person who reports a violation shall not incur any contractual, tort, defamation, or reputational liability, provided that, according to national legislation and this Policy, they had reasonable grounds to believe that the information they provided was accurate.
29. A person is only held liable for damages resulting from a violation report if it is proven that they could not have reasonably believed the information was accurate. Any individual who knowingly submits false information or discloses a trade secret shall be held accountable under applicable laws.
30. This Policy takes effect on the date of its approval and may be amended or supplemented by order of the CEO of cargoGo Logistics.
31. The employee responsible for managing the internal reporting channel at CargoGo Logistics must sign an acknowledgment of this Policy, while all other employees shall familiarize themselves with it through the internal company system.
32. Information about reported violations shall be retained for no less than five years from the date of the final decision regarding the case.

VIII. QUESTIONS

33. If you encounter any issues, have doubts about this document, are unsure how to act in a particular situation, or have complaints regarding compliance with this Code, you are advised to contact your designated representative or email: trust@cargogo.eu.