

Code of Sustainable Conduct

This Code reflects MAGNUS LOGISTICS commitment to sustainability. Through our activities, we act responsibly and work to make a positive contribution to the environment and to the communities where we operate. This Code sets out how we work to achieve support for our activities through responsible social, economic and environmental performance.

The Code requires employees and contractors to comply with applicable laws and regulations, and with all MAGNUS policies and standards. MAGNUS Health, Safety, Environment and Community (HSEC) Management Standards as well as other corporate policies and reference documents provide explicit requirements and other guidance that will assist in implementing the Code conducting MAGNUS business, we will:

Ethical Business Conduct

- 1. Always obey the law, report all incidents, and conduct business in accordance with our Code of Ethics and avoid all forms of corruption in accordance with our Anti-Corruption Policy.
- 2. Ensure that no discriminatory conduct, harassment including sexual harassment, forced labour or child labor occurs in the workplace.
- 3. Uphold freedom of association and the right to collective bargaining for our workforce and provide fair living wages and working hours.
- 4. Promote inclusion and diversity in our workforce in accordance with our Inclusion and Diversity Policy.

Impact, Risk and Opportunity Management

- 5. Conduct activities to avoid, minimize or mitigate negative environmental, social and economic impacts, maximize positive impacts, and work to continually improve our performance.
- Identify and analyze risks and opportunities facing our business; continually improve health, safety, environmental and community policies, management systems, and controls, and ensure they are fully integrated into our activities.
- 7. Work to improve our longer-term social, economic, and environmental performance by implementing our Sustainability Strategy.

Health and Safety

- 8. Promote a culture of health and safety and recognize and continually reinforce company-wide efforts to achieve zero safety or health incidents, in accordance with our Health and Safety Policy.
- 9. Ensure that all employees and contractors have the knowledge and ability to safely perform their duties.



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 Identify and manage occupational health and hygiene exposures for the protection of longerterm health.

Environmental Stewardship

- Integrate biodiversity considerations through all stages of our activities; design and operate for closure, respect legally designated protected areas, and refrain from exploring or mining in UNESCO World Heritage sites.
- 12. Promote the efficient and responsible use of energy, water and other resources throughout our business in accordance with our Water Policy and Strategy for Climate Action.
- 13. Implement practices to ensure the safe operation and closure of tailings storage facilities.

Community Engagement

- 14. Recognize and respect the rights and aspirations of people affected by our activities, in accordance with our Human Rights Policy and Indigenous Peoples Policy.
- 15. Foster open and respectful dialogue with communities of interest throughout the mining life cycle, and work to achieve free, prior, and informed consent of Indigenous Peoples.

Supply Management and Economic Development

- 16. Support local communities through measures such as development programs, locally sourcing goods and services, employing local people.
- 17. Engage our suppliers in the implementation of the Code to promote responsible use and supply of materials and metals, in accordance with our Expectations for Suppliers and Contractors.
- 18. Ensure the materials we use and the products we produce do not use conflict minerals.

Audits and Reporting

- 19. Maintain a confidential feedback mechanism that allows employees, contractors, and other stakeholders to report violations of our Code of Ethics and other concerns.
- 20. Conduct regular audits to ensure adherence with this Code.





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