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APPROVED
by the Board of Directors
of the Company on 30 April 2020


Chairman of the Board of Directors

GLOBALTRANS INVESTMENT PLC

Human Rights Policy

OVERVIEW

Since it was founded, Globaltrans has sought to conduct business in accordance with the highest ethical, legal and professional standards as we strongly believe that prosperous business development cannot exist without respect for fundamental human rights and freedoms. This Human Rights policy has been prepared in order to formalise the long-term commitment of Globaltrans and its subsidiaries (the "Group") to respect and value people and their rights

In addition to compliance with applicable law, the Group has been guided by internationally recognised norms and adheres to a wide range of universal principles embedded in key international human rights frameworks, including:

- Principles of the UN Global Compact;
- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- ILO Declaration on Fundamental Principles and Rights at Work;
- UN Guiding Principles on Business and Human Rights.

As a business, the Group has set as objectives both to respect human rights through the effective and constant implementation of this policy and the Code of Ethics and Conduct, and to educate and support our people in their efforts to comply with these policies.

RESPONSIBILITIES

Non-discrimination

As stated in the Group's Code of Ethics and Conduct, as adopted and approved by the Board of Directors in 2008, we treat everyone who works for and with Globaltrans fairly and without discrimination whether on the basis of age, disability, ethnicity, national origin, gender, race, color, religion, sexual orientation or other perceived differences.

Our employees, clients and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.

Diversity

Globaltrans is committed to selecting the best candidates on the basis of their performance, skills, experience and qualifications in line with the approach embedded in the Group's core values of ensuring equality, impartiality and respect.

In that regard, the Group believes that a commitment to cultural and individual diversity is critical to achieving its strategic goals. The Group values difference and promotes respect and dignity for all regardless of an individual's age, disability, ethnicity, nationality, gender, race, color, religion, sexual orientation or any other status protected under applicable law.

Health and safety

The well-being of our people is of paramount importance to Globaltrans. To that end, we are committed to complying with occupational safety and health administration requirements to provide a safe and healthy work environment. Due to the nature of our business, our employees generally work in low risk environments. Nevertheless, we actively train and educate our personnel in occupational safety in order to develop a culture of awareness and responsibility in the workplace. We also regularly check conditions in the workplace to ensure that standards remain high and so that we can promptly address any safety issues that may arise.

Employees are expected to report all accidents to the appropriate supervisors or the Human Resources department.

Compensation and working hours

The Group, as well as our customers and suppliers, are required to be in compliance with all applicable labour laws, including those regarding minimum wage, working hours and overtime. We believe in providing a fair income for work undertaken.

We also believe in our employees' development, so that they feel valued and see progress in their skills and capabilities. We therefore provide our employees with learning and development opportunities in order to enhance their career opportunities and increase job satisfaction.

Freedom of association

Globaltrans recognises the right of its employees to collective bargaining. We respect our employees' choice on the matter and are committed to maintaining a constructive dialogue with employees' freely chosen representatives.

Approach to compliance

The Group is committed to identifying, assessing and mitigating human rights risks. The implementation of our Code of Ethics and Conduct and our Human Rights Policy is the responsibility of everyone. To ensure respect for and adherence to our values, we regularly evaluate human rights issues, conduct any necessary training, and integrate the results into our business activities.

Globaltrans strives to maintain a work environment that encourages open communication regarding ethical problems and concerns. As stated in the Group's Whistleblowing Policy that governs the investigation and reporting of improper activities, including violations of the Code of Ethics and Conduct, every employee is entitled to submit concerns in a confidential and anonymous manner to the General Counsel's office or Human Resources department and, in certain instances, to the Audit committee. These bodies are responsible for coordinating the development, communication, implementation, and monitoring of the Policy in the Company.