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Code of Conduct

Introduction

At GPA LOGISTIKA we recognize that our business has an impact on social and environmental issues, in particular people's working conditions.

GPA LOGISTIKA business aims to have an overall positive impact on people and the environment. Through these principles we continue to follow our sustainability path.

GPA LOGISTIKA expects Suppliers to support business through compliance with applicable laws, rules, regulations and contractual obligations. GPA LOGISTIKA's Suppliers must comply with all valid legislation.

GPA LOGISTIKA Code of Conduct is based on the UN Declaration of Human Rights and the fundamental principles of labor law.

We expect our colleagues and companies we cooperate with comply with the provisions in the GPA LOGISTIKA Code of Conduct.

For more information, please contact by e-mail info@gpalog.com



Contents

1. People and workplace

GPA LOGISTIKA is committed to respecting human rights and the fundamental principles and rights at work as defined in the UN declaration of Human Rights. Our policy is that all people who works for GPA LOGISTIKA or employees of our suppliers, must be treated with respect.

1.1. Human rights and discrimination

GPA LOGISTIKA and its suppliers uphold and abide by conventional human rights and labor laws.

We recognize and support equal human rights.

We do not tolerate: harassment, abuse, discrimination, different treatment based on gender, race, nationality, language, origin, social status, age, sexual orientation, disability, ethnic origin, religion, political orientation, beliefs, convictions or views. Physical, sexual, mental or verbal abuse is prohibited, as are threats of abuse and any form of intimidation.

Rude and inhumane behavior is prohibited.

In case of violation of these principles please contact the responsible person via e-mail at info@gpalog.com

We guarantee confidentiality!

1.2. Employment and working conditions

GPA LOGISTIKA follows current national legislation with respect to employment, wages, working hours and working conditions.

1.3. Child labor

GPA LOGISTIKA and its suppliers do not accept child labor and if such cases are identified, commits to respect the best interests of the child by enabling him/her to attend and remain in quality education.

The national minimum age for employment is 16 or the age of completion of compulsory education, whichever is higher. Children and young people under 18 shall not be employed at night or in hazardous conditions.

1.4. Wages

GPA LOGISTIKA and its suppliers should pay wages and benefits for a standard working period (month/week) that meet national legal standards or industry benchmark standards, whichever is higher.

All workers shall be provided with a written and understandable contract with their employment conditions and wages before they enter employment.

Deductions from wages as a disciplinary measure shall not be permitted

1.5. Working hours

Working hours must comply with national laws, and the provisions below, whichever affords the greatest protection for employees. GPA LOGISTIKA suppliers must ensure rest periods and working hours will be regulated in accordance with EU rules (https://ec.europa.eu/transport/modes/road/social_provisions/driving_time_en) or local laws in countries where EU regulations do not apply.

1.6. Health and safety

GPA LOGISTIKA promotes a culture of health and safety, and recognizes and continually reinforces companywide efforts to achieve zero safety incidents.

2. Competition

GPA LOGISTIKA works with those who share the same opinion and believe that business must be conducted responsibly and in accordance with the law. We do not knowingly work with suppliers and partners who violate applicable laws or regulations, and we will not use the services of a third party if it acts in violation of the law or our Code of Conduct.

The laws and regulations of fair competition are designed to preserve free and open competition, to promote the practice of fair business between companies.

3. Anti-corruption

GPA LOGISTIKA ensures that anti-corruption rules are applied.

3.1. Bribes and kickbacks

GPA LOGISTIKA complies with all applicable bribery prevention laws. These laws prohibit the giving or offering of a gift, loan, fee or anything valuable to/from another person or organization with the aim of obtaining benefit.

Suppliers must not accept or offer a bribe of any kind and support corruption policies even if they are a part of local law or local custom.

3.1. Money laundering

Money laundering is sending the proceeds of crime through a financial system or institution to disguise their origin. It is also the transfer and use of legitimate funds for criminal purposes, often as a terrorist activity. Both types of money laundering are prohibited.

We comply with all laws and requirements regarding accounting.

In the event of any doubt as to the source of a business partner's funds, we refuse to cooperate with them.

4. Gift policy

GPA LOGISTIKA and our suppliers are committed to conducting business with the high standard of integrity and good governance. The objectives of the No Gift Policy are to avoid any conflict of interest and demonstrate commitment to providing equal treatment to all individuals or organizations. "Gift" means something that is given to another person, including but not limited to cash, vouchers or any item having any cost or financial value. In this regard, our employees and suppliers shall not solicit or receive any gifts from current or potential business partners/associates, either directly or indirectly, which may influence decision making process or put the employees or suppliers in a position of conflict

5. Confidential information and data

5.1. Confidential Information

It is especially important to ensure and maintain the security of confidential information of the company, our customers, suppliers and all other partners.

Our employees undertake to protect the confidential and proprietary information of GPA LOGISTIKA and its customers, and not to disclose confidential information to third parties or use it for personal purposes or for the benefit of third parties without the prior consent of GPA LOGISTIKA.

Information which, if disclosed, may harm the interests and/or reputation of GPA LOGISTIKA or its affiliates/companies, and which is protected and/or valuable because it is not publicly known and cannot be known by third parties (individuals that are unrelated to GPA LOGISTIKA, as well as any other information that the company considers confidential and shares with an employee covered by the company's internal rules and confidentiality agreements, which shall be strictly observed, shall also be protected.

5.2. Data protection

At GPA LOGISTIKA, all personal data of employees and associated persons is managed in accordance with all applicable legislation regarding the storage and management of personal data. For this purpose, the company has established procedures which define for how long and in what way personal data is collected and processed.

In order to keep your personal data secure, we have implemented processes which help us to ensure that.

We expect our suppliers to have established internal policies and procedures which define and ensure personal data security.

We expect our suppliers and employees to uphold and nurture the values and strategy of the company, as well as not to spread any false and degrading information about the company. It is prohibited to discuss, either directly or indirectly: gender, race, religious beliefs, political orientation, nationality, or to share disrespectful content when communicating in public on behalf of the company. Providing or publishing any kind of misinformation about the company/customers/partners which may damage its reputation, regardless of the source of information, is also strictly prohibited.

6. Environment

GPA LOGISTIKA is committed to achieving the goals indicated in the ISO 14001 standard, we have singled out CO2 emissions as one of the most significant aspects of environmental protection.

In order to systematically reduce our environmental impact, we collaborate with suppliers who use up-to-date trucks to transport goods, as well multimodal/intermodal solutions.

We educate and encourage employees to follow an environmentally-friendly lifestyle.

The company also strongly focuses on the digitisation of processes and thus limits its use of resources required for printing.

7. Implementation

As a company, we are committed to conducting our business according to the highest ethical business standards and we expect the same from our suppliers. The code is communicated to all GPA LOGISTIKA employees to ensure its understanding and proper implementation and also to our suppliers through the company website www.gpalog.com

If you have any questions or have witnessed a violation of the principles in the Code of Conduct, please contact the responsible person at GPA LOGISTIKA via e-mail at info@gpalog.com.

We reserve the right to verify at any time whether our suppliers or partners are in compliance with the GPA LOGISTIKA Code of Business Ethics.

