



OUR CODE OF CONDUCT

HOW WE ACT AND CONDUCT OUR BUSINESS



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trans-o-flex

Introduction

trans-o-flex¹ successfully brings together people of different descents and cultures and with different perspectives and capabilities. The diversity of our personnel enables our company to develop and implement effective solutions for our customers. At the same time, such diversity requires us to lay a clear common basis of understanding. This is intended to lay the foundations for our conduct for both internal and external reference. Such a basis allows trust to grow. It enables sustainable and successful collaboration with each other, with customers, business partners and suppliers. This basis is provided by ethical rules that we have imposed on ourselves and laid down in the guidelines on ethics and behaviour in our Code of Conduct.

As a guideline for our decisions and actions, the Code of Conduct provides binding minimum standards for responsible behaviour within the company and towards business partners and the public. The Code also helps to avoid legal infringements by sensitising personnel to legal risks. The subjects contained therein cover the entire spectrum of our day-to-day work in all of its facets. These include the award and acceptance of contracts, customer orientation and profitability, equal opportunities and human

rights, occupational health and safety, quality and reliability.

The Code of Conduct represents a binding operating framework for all trans-o-flex personnel regardless of their duties or positions. We have developed the Code jointly and it is something we are proud of. The Code is not merely something written down on the following pages, it is practised in our company every day. Responsibility and first-class performance go hand in hand for us. This is a standard we are happy to be measured by.

¹ The Group of companies comprises all companies in which trans-o-flex Express GmbH & Co. KGaA has a direct or indirect holding of at least 50%.

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About our Code of Conduct

What is the Code of Conduct?

The Code of Conduct is based upon our Mission Statement and defines our business conduct – every day and everywhere. Thus, all of us can contribute to the success of our company by bringing the Code of Conduct to life.

The Code describes and summarises the objectives and rules that reflect our obligation to conduct ourselves responsibly, lawfully and in an ethically perfect manner. The content is based upon international agreements and ethical standards and reflects our commitment to the UN Global Compact.

To whom does the Code of Conduct apply?

The Code of Conduct applies to all personnel and all company and business divisions of trans-o-flex. The Board of Directors bears the ultimate responsibility for ensuring the standardised application of our Code of Conduct. All management personnel are responsible for the application and observance of the Code within their respective areas of responsibility.

What is correct conduct?

As a service provider, we maintain permanent relationships with a large number of different people and organisations. This places regular

demands on our personal integrity and healthy judgement. Sometimes, we are also confronted with difficult situations or face situations that are not explicitly outlined in the trans-o-flex Code of Conduct or in the documents referred to in the Code (e.g. guidelines or directives). In the event of uncertainty with respect to proper conduct, please ask yourself the following questions:

- Is my conduct or decision lawful?
- Does it conform with our values, the principles laid down in the Code of Conduct and our internal guidelines and rules on behaviour?
- Is it correct and free from personal interests?
- Does my conduct or decision stand up to public scrutiny?
- Does my conduct or decision protect the reputation of trans-o-flex with its high ethical standards?

Often, this will be sufficient for complete clarification. If you can answer “yes” to these questions, it is highly probable that you are acting and deciding correctly and in compliance with the principles of the Code. However, those who are still uncertain or in doubt regarding correct conduct can seek help and advice from their supervisor or via compliance@tof.de.

Whom does the Code of Conduct protect?

The Code of Conduct summarises our guidelines and principles for day-to-day business conduct that complies with the law and our values. By adhering to these conduct guidelines, you protect the reputation of our company, our business partners and our customers as well as your own. At the same time, you contribute to our business success since trust can only grow on a common basis and only if we have trust, is a sustainable and successful collaboration possible.

What reporting channels are there?

We encourage our personnel to report any knowledge of a potential infringement of this Code, the law or company rules. To this end, we offer our personnel the facility to speak to their supervisors, Human Resources, the Legal department or to speak anonymously to an external reporting facility especially established for trans-o-flex. All reports are treated confidentially.



Our ethical obligations

Applicable law and ethical principles

We adhere to all legal directives applicable to our business activities as a matter of course. Any infringement of applicable laws or directives can have severe consequences.

All management personnel at trans-o-flex are obliged to familiarise themselves with the fundamental laws, directives and internal company rules relevant to their area of responsibility. This particularly applies to management personnel whose role entails particular responsibility for ensuring compliance. The Legal department should be consulted in the event of doubt with regard to the legal appropriateness of a decision.

We respect the different interests of our business partners and customers by acting with honesty, fairness and integrity.



Human rights

trans-o-flex is committed to the principles of the Global Compact of the United Nations. Accordingly, we respect human rights within our sphere of influence and expressly commit to eliminating any form of child or forced labour. In accordance with the relevant applicable national laws, we respect the principles of the International Labour Organisation (ILO) on fundamental rights and principles relating to work.

Our principles

Quality, efficiency and customer satisfaction

We strive to sustainably develop our business in a manner based upon economic efficiency and corporate responsibility. Quality is of central importance to business operations at trans-o-flex. This is why we constantly work towards improving our processes, services and behaviours for the benefit of our customers.

Our promise is to be synonymous with excellence in logistics to our customers. This is why our customers and their satisfaction are always our central focus – in every project, in every innovation and at all stages of our work.

Transparency, open dialogue and mutual respect

We foster an open approach towards our customers, shareholders, suppliers, business partners and other organisations and institutions. We are transparent and honest in our communications, both internally and externally. For the purposes of standardised communication, we have appropriate internal guidelines with regard to contact with the media, politics and stakeholders.

Open discussion of concerns contributes decisively to ensuring that wrongdoing occurs less frequently or that it is recognised at an earlier

stage and can be corrected accordingly. This is why we value a culture of openness in which personnel can turn to their supervisors or the Board of Directors without hesitation, even in critical situations. We do not tolerate attempts to intimidate or reprisals against personnel who report suspected wrongdoing according to the best of their knowledge and with honest intentions.

It is part of our corporate culture that relationships at all levels and in all business divisions are conducted with mutual respect, openness, honesty and a shared understanding of trusting collaboration. We clearly stand against

any form of violence or abuse in the workplace, which also includes threatening or intimidating behaviour. Everybody at trans-o-flex is therefore asked to contribute towards eliminating any form of harassment. This includes indecent proposals, undesired sexual advances or undesired physical contact as well as, for example, offensive jokes or remarks and humiliation in the work environment.

All personnel are also at liberty to a join workers' representation or a union should they wish to do so. We recognise and respect rights to pursue collective bargaining under applicable laws.



Equal opportunities and diversity

We are committed to equal opportunities and promote a working environment characterised by respect and tolerance, which recognises the value and dignity of each individual and in which all personnel treat each other with politeness, honesty and dignity.

The essential criteria in the selection and development of our personnel are capabilities and qualifications. Decisions regarding personnel are, therefore, fundamentally free from any discrimination. We do not tolerate discriminatory behaviour towards personnel or applicants for reasons of ethnicity, nationality, gender, age, disability, religion or world view, sexual orientation or other legally protected characteristics.

Health and safety and working conditions

The safety and wellbeing of our personnel are essential prerequisites for the financial success of trans-o-flex. That is why we give the utmost priority to adhering to applicable occupational health and safety laws as well as our internal health and safety guidelines. The physical and mental health of our personnel is important to us. Our objective is not merely to achieve lower sickness rates and accident statistics but, above all, to cultivate capable and engaged personnel. This is why our management personnel ensure

that appropriate procedures and protective measures are in place to ensure health and safety in the workplace.

We also adhere to legal regulations to ensure fair working conditions, including those regarding remuneration, working hours and protection of privacy as a matter of course. This particularly includes applicable laws on collective

bargaining, legal requirements regarding minimum wage as well as statutory social security contributions.

Environmental protection

We take an integrated approach to sustainability and environmental protection. We address any causes of potential environmental impacts.

Negative effects of our activities are reduced using effective environmental management systems and modern technology. What this means for us, as part of our responsibility, is bringing together four challenges: maximum customer benefits, optimal safety standards, profitable results and maximum environmental and climate compatibility.



Our business practices

Fair competition

Our objective is to secure our market position for the long term and to make use of our growth potential. In doing so, we not only ensure that we operate our business exclusively based upon the principles of performance and free and fair competition. We also ensure careful selection in our employment of and collaboration with suppliers and transport partners and only employ these following a fair assessment of performance. We adhere to regulations on competition and competition law.

Business relationships

We act with integrity in our business relationships with others and expect our business partners, suppliers, subcontractors, consultants and representatives to observe laws and statutes as well as the content of this Code of Conduct. Details are specified in our Code of Conduct for Suppliers.

When dealing with governments and authorities, we always act with honesty and transparency and in compliance with applicable law. This particularly applies to contact with authorities and political interest groups or official enquiries (requests for information, official investigations, court proceedings). In the event of any official enquiries, our personnel notify the



Board of Directors and the Legal department before further steps are taken. Thus, we ensure that all legal requirements are observed.

Company property

We act responsibly with company property or other assets of the company. This particularly includes responsible handling of company property of any kind, e.g. work equipment or intellectual property. We use company property exclusively for the intended business purposes. Misuse for other, particularly inappropriate per-

sonal, illegal or otherwise unauthorised purposes, is prohibited.

Corruption and bribery

Any form of bribery or corruption, whether involving officials or in the course of business, is prohibited at trans-o-flex. When dealing with our customers, business partners, suppliers and authorities, we adhere to applicable law and international anti-corruption standards, as laid down in the UN Global Compact for example.

Imprint

Publisher

trans-o-flex Express GmbH & Co. KGaA

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Date: November 2021

Gifts and benefits

Gifts, such as those associated with invitations or advertising measures, which are ethically beyond reproach, that promote business relations or that serve the purpose of presenting products or services are permitted in moderation. However, such gifts may only be accepted or granted if they serve a justified business purpose and are not accepted or granted as quid pro quo for an unlawful benefit. Gifts may not be of an inappropriately high value and must not exceed the limits of normal business practice.

None of our personnel may demand gifts or other personal benefits from business partners, suppliers or customers. The giving or acceptance of gifts or other benefits is particularly prohibited if these appear likely to influence upcoming decisions. All personnel of trans-o-flex are obliged to adhere to the specifications of our guideline on "Accepting and granting gifts, invitations and other benefits" without exception.

Donations, charitable contributions and sponsorship

Our personnel are instructed to exercise extreme caution when requested or offering to provide sponsorship, donations or charitable contributions. In particular, these must not be used to bypass our guideline on "Accepting and

granting gifts, invitations and other benefits" and must comply with this Code of Conduct. Careful investigations are required to ensure that these are not a covert attempt at bribery.

Conflicts of interest

When dealing with conflicts of interest, we expect our personnel to act in a manner that is ethically beyond reproach at all times. Personnel faced with a potential or actual conflict of interest are obliged to promptly notify their supervisors or the Board of Directors to enable rapid clarification. Personnel are particularly instructed to notify their supervisors in the case of relationships with related persons or companies maintaining business relations with trans-o-flex.

Confidentiality and data protection

In the event that the public is not already aware of it, our personnel treat information of all kinds confidentially and do not forward it to third parties. Such information particularly includes financial data, operational data, customer data, data on our personnel and other information relating to the business and operational activities of trans-o-flex.

When gathering, recording, processing or trans-

ferring personal data of personnel, customers or other third parties, we take the utmost care and handle this with strict confidentiality as well as adhering to applicable laws and regulations. Personnel who handle personal data receive advice and support from the Legal department and data protection officers.

Sanctions and modifications

In the event of infringements against this Code, trans-o-flex will initiate appropriate measures for clarification. In the first instance, the employee concerned will be encouraged to modify his/her behaviour by receiving an explanation of the importance of our Code of Conduct. In addition, in the event of infringements, measures under employment law may be initiated in accordance with applicable legal directives.

trans-o-flex reserves the right to review this Code of Conduct regularly and to adapt it where necessary.

Associated guidelines and regulations

This Code of Conduct provides a basis for all guidelines and regulations in the context of optimal ethical behaviour.

To solidify the content of this Code of Conduct and to account for regional characteristics, further guidelines and regulations may be established. Terms and formulations used in such additional documentation must not contradict this Code of Conduct. Obligatory regional legal directives shall take precedence where these contain more stringent regulations.



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