

# ***Code of Conduct***

***[www.gw-world.com](http://www.gw-world.com)***

## ***Foreword***

**For generations, family business Gebrüder Weiss (GW) has been aware of its responsibility to embody and convey ethical values. These values are authoritatively enshrined in this Code of Conduct. All the members of the Board of Management, executive managers and employees at Gebrüder Weiss GmbH and its global subsidiaries over which it has direct control are bound to comply with this Code of Conduct. Executive managers are obliged to set an example and embed the values more deeply in the organisation.**



# 1.

## ***Value System***

As well as goods and data, GW also moves people who come into contact with us through the internal or external network. We are moving forward with our customers, with a forward-looking approach and innovative ideas. We aim to impress with our services and products, for which we consciously use resources efficient solutions that are economical with resources. Our strategy is based on the core values of

**Independence**

**Sustainability**

**Commitment**

**Service Excellence**

They define our daily actions and therefore represent a central feature of our Code of Conduct. Within its entrepreneurial activity, GW is committed to complying with all the statutory regulations and the rules set out in this Code of Conduct. We encourage our business partners to also commit to internationally recognised ethical principles and expect them to comply with the applicable laws and regulations.

# 2.

## ***Social Responsibility***

Sustainability represents a corporate value for GW. It is particularly important to us that our commitment in this area is always measurable and transparent. This is why, since 2009, we have published a sustainability report according to the Global Reporting Initiative (GRI) guidelines. We aspire to operate economically and environmentally, and to not only be aware of our social responsibility, but also to practice it actively.

### ***Human rights***

The GW Group regards observance of international human rights and human dignity as an elementary component of its values.

### ***Child labour and forced labour***

The GW Group condemns child labour and any form of forced or compulsory labour.

### ***Freedom of association***

The GW Group respects the right to freely associate and the right to collectively negotiate and protects these rights at all its sites worldwide.

### ***Discrimination***

GW recognises and promotes equal treatment of individuals, regardless of gender, religion, sexual orientation, ethnic origin, nationality, age, political opinion, trade union activity or a disability. The Group's cultural diversity is regarded as an asset and discrimination against individuals or groups of people will not be tolerated.

### ***Lifelong learning***

At GW, further vocational education and training is understood to be a strategic factor for success. It's necessary to prepare employees for current and future challenges in the company. Great importance is attached to the range of education and training available at GW, which is why a separate fund was established back in 1988 to finance education and training programmes.

### ***Protection of health and safety at work***

GW's business activity incorporates adequate preventative measures to ensure health and safety at work.

### ***Environmental protection***

GW has an environmental management system. We are committed to quality assurance and to environmentally compatible and sustainable, responsible activity, and regard environmental protection as a challenge for which it is worth making resources available, now and in the future.

# 3.

## ***Business partners***

We aim to fill our customers with enthusiasm, which is why our daily work is based on an exceptional quality of service. With a seamless organisation extending across national borders, we have created the conditions for this. Our employees excel in competence and a solution-oriented approach. We constantly strive to improve, and we proactively shape our future.

### ***Competition and anti-trust law***

GW promotes fair competition and abides by the provisions of anti-trust law; we do not tolerate agreements which inhibit competition, such as pricing agreements. GW also expects this attitude from its business partners. As far as GW is concerned, quality of service should be the decisive factor for the customer.

### ***Corruption***

As a member of Transparency International, GW applies the principles of transparency, responsibility, integrity, solidarity, civil courage, justice, democracy and supremacy of the rule of law. GW expressly distances itself from any form of corruption, including extortion and bribery. Our employees and third parties instructed by GW are therefore bound to neither offer nor accept any benefits which could influence commercial decisions.

### ***Service providers***

The remuneration paid to consultants, agents or brokers must be proportionate to the service rendered. Third parties may not be instructed in order to provide business partners with prohibited benefits.

### ***Officials/political parties***

Granting secret benefits of any kind to employees or representatives of authorities or public enterprises is prohibited. This also includes donations to political parties, associations or elected representatives or candidates for political office.

### ***Donations***

Donations to organisations in the fields of education and science are also permitted in addition to our commitment to social projects, as long as they are voluntary and there is no expectation of a consideration in return.

### ***Sponsorship***

Sponsorship of sports clubs, artistic and cultural associations is permitted as long as it is voluntary and any considerations expected in return are established in a contract.

### ***Money laundering/terrorism***

It is a matter of course for GW that the company takes preventative action in the international fight to combat money laundering and terrorism and takes measures within its own sphere of influence to counteract such activities.

## ***Our employees' responsibility***

GW regards its employees as its biggest corporate asset and gives priority to their safety and satisfaction. As a family business, GW traditionally regards itself as being responsible for defining values as the basis for dealing with people inside and outside the organisation. Employees are obliged to comply with these regulations.

# 4.

### ***Protection of health and safety at work***

Employees are obliged to adhere to the safety regulations and to avoid endangerment to health through safety-conscious behaviour. If potential improvements are noted, these are to be immediately reported to the competent line manager or department responsible.

### ***Public image***

The public perception of GW is also affected by our employees' image, including in the digital public arena. We always approach our customers and business partners in a friendly and service-orientated manner and treat them with corresponding respect.

### ***Conflicts of interest***

It is necessary to avoid conflicts of interest and to inform line manager(s) or the Compliance Department if such is even suspected. A conflict of interest is present if employees' private or personal financial interests conflict with GW's corporate policy or the relationship with business partners. It must furthermore be ensured that, in the

event of secondary occupations and participation in business partners or competitors, these do not constitute a conflict of interest.

Exercise of a role in the Works Council or a trade union is not to be regarded as a conflict of interest.

### ***Invitations and gifts***

In addition to the statutory regulations, acceptance of invitations and gifts, or the making of gifts and issuing of invitations, is only permitted insofar as these do not give the impression of being an attempt at improper influence. It is a prerequisite that these be voluntary and not accepted or granted in the expectation of a consideration in return.

### ***Confidentiality***

Information about customers, partners, subcontractors, employees and competitors that is not publicly known is treated as confidential and not passed on to unauthorised third parties or used for private purposes.

# 5.

## ***Confidence***

By virtue of its solid basis, GW is independent and strategically oriented towards sustainable success. The achievement of long-term goals therefore clearly takes precedence over maximising quarterly profits. GW is committed to its owners and employees, whose commitment and confidence are indispensable to achieve our goals.

### ***Company property***

GW's property is to be used exclusively as part of business activity and under no circumstances may it be used for unapproved, non-company purposes. Sale and removal of assets can only take place in accordance with the regulation of approval powers.

### ***Reporting***

All reports must comply with the statutory requirements and the internal guidelines and faithfully reflect the company's situation.

### ***Data protection***

Data protection principles are observed and safeguarded by our information technology system. Personal details are only used and processed to the legally permissible extent required for business activities.

## ***Compliance with the code of conduct***

GW's Code of Conduct will be implemented at all company sites worldwide and employees must comply with it. Its validity extends to Gebrüder Weiss GmbH and its subsidiaries, if the Group owns at least 50% thereof and management is incumbent upon Gebrüder Weiss GmbH or people or committees deployed by Gebrüder Weiss GmbH.

### ***Obligation to comply with the code of conduct***

All members of the Board of Management, CEOs, executive managers and employees of the GW Group are obliged to comply with the Code of Conduct. Responsibility for implementing this Code is top down.

### ***Reporting of violations***

GW Group employees are obliged to report violations of laws or internal regulations to line managers, another manager, the Works Council or the Compliance Department. All the information conveyed will be treated as confidential.

### ***Whistleblower protection***

GW does not tolerate any action against people who report actual or suspected Code of Conduct violations. In return, GW reserves the right to take disciplinary measures against employees who knowingly make false accusations.

### ***Consequences***

In the event of violations of laws or internal regulations, disciplinary action and action under employment law will be taken in the interests of our employees, business partners and the company. Violations of prevailing law can also entail consequences under civil or criminal law.

### ***Additional information***

Should you have any questions or require further information, please contact the Compliance Department.

# 6.