

Code of Conduct

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Foreword

For generations, the family-owned company Gebrüder Weiss (GW) has been aware of its responsibility to live, communicate and expect compliance with ethical values from its employees and business partners. These values are set out in binding form in this Code of Conduct. The Managing Directors, all executives and employees of Gebrüder Weiss GmbH and its directly controlled subsidiaries worldwide are obliged to comply with these guidelines. Executives are encouraged to act as role models and to carry the values deeper into the organization.



1.

Value system

GW not only moves goods and data, but also people who are connected with us internally or externally within the network. We are moving into the future together with our customers, thanks to progressive action and innovative ideas. In doing so, we aim to inspire with our services and products, consciously focusing on resource-saving solutions. Our strategy is based on the core values

Independence

Sustainability

Commitment

Service Excellence

that determine our daily actions, thus forming central elements of our Code of Conduct. Within the scope of its business activities, GW is committed to compliance with all legal regulations and to observing the principles listed in this document. We expect our business partners to also commit to internationally recognized principles regarding ethical values and require them to comply with applicable laws and policies.

Social responsibility

2.

At GW, sustainability represents a core value of the company. We attach importance to ensuring that our commitment in this area is always measurable and transparent. To this end, we have been publishing a sustainability report in accordance with the Global Reporting Initiative (GRI) standard since 2009. We aim to act in an economically and ecologically sensible manner while actively living our social responsibility.

Discrimination

GW respects and encourages the equal treatment of individuals, regardless of gender, religion, sexual orientation, ethnic origin, nationality, age, political opinion, union activity or disability. The cultural diversity of the Corporate Group is regarded as an asset, and discrimination against individuals or groups of individuals will not be tolerated.

Lifelong learning

At GW, vocational training and further education is seen as a strategic success factor. The aim is to prepare employees for current and future requirements within the company. GW attaches great importance to further training, which is why a special fund was set up in 1988 to finance training measures.

Occupational and plant safety, health and environmental protection

Every employee shares responsibility for protecting people and the environment in his or her work environment. All relevant laws and regulations concerning environmental protection or plant and occupational safety must be strictly observed. The same applies to the company's internal guidelines and regulations. Each supervisor is required to instruct, supervise and assist his or her employees in living up to this responsibility. In areas where neither regulations on safety, health or environmental protection nor internal company guidelines and specifications exist, an independent decision must be made in consultation with the supervisor, if necessary.

Compliance with all laws protecting people and the environment is a fundamental principle for our company, arising from legal and ethical principles in equal measure. Even beyond the requirements of existing laws, our company is working continuously to improve processes and procedures in order to further reduce environmental pollution and health hazards. Should accidents or operational disruptions occur nevertheless, it is our goal to initiate the necessary measures for danger prevention and damage repair as quickly and purposefully as possible. Therefore, the responsible departments must be informed immediately and comprehensively. These departments must also arrange for legally required reports to the authorities to be made immediately and comprehensively.

Working conditions and human rights

Child labor and young workers

Child labor will not be tolerated, and the hiring age must be in accordance with the labor laws of the respective country.

Wages and social benefits

Compensation and social benefits are competitive and comply with the applicable laws of the country, particularly those relating to minimum wages, overtime pay, and statutory benefits.

Working time

Working time, including overtime, is in accordance with applicable local laws regulating working hours.

Forced labor (modern slavery and human trafficking):

Any form of forced or compulsory labor, including human trafficking, will not be tolerated.

As a result of the technical and professional orientation of our business activities, any risks of Gebrüder Weiss becoming involved in modern slavery or human trafficking will not be tolerated. We realize that identifying modern forms of slavery is a complex undertaking, and we will make additional efforts to ensure that the requirements of the law are met.

Not only we, internally, but also the contracting partners, vendors, suppliers and other partners that Gebrüder Weiss conducts business with must not engage in any business practices that would constitute human trafficking or slavery.

Freedom of association

Employees can communicate openly with the management about working conditions without fear of reprisal, intimidation or harassment.

Employees are entitled to freely associate, join or seek representation in trade unions and join works councils, in accordance with the applicable laws of the country.

Harassment and discrimination

Any form of harassment or discrimination against employees is unacceptable.

Business partners

We want to enthuse our customers, which is why outstanding service quality is the basis of our daily work. The seamless organization across national borders we have created ensures perfect conditions to achieve this goal. Relying on their competence and solution orientation, our employees do a convincing job. We are constantly striving for improvement, taking a proactive attitude.

3.

Competition and anti-trust law

GW promotes fair competition and complies with anti-trust regulations; restrictive agreements such as price fixing are not tolerated. GW expects the same attitude from its business partners. GW believes that the quality of the service should be the decisive criterion for the customer.

Corruption

As a member of Transparency International, GW is governed by the principles of transparency, accountability, integrity, solidarity, civil courage, justice, democracy, and the rule of law. GW expressly opposes all forms of corruption, including extortion and bribery. Our employees as well as third parties commissioned by GW must neither offer nor accept any benefits that might cause business decisions to be influenced.

Service providers

The fee paid to consultants, agents or intermediaries must be commensurate with the service provided. The commissioning of third parties must not serve the purpose of providing business partners with inadmissible benefits.

Government officials/ political parties

The granting of concealed benefits of any kind to employees or representatives of public authorities or state-owned companies is not permitted. This also includes contributions or donations to political parties or associations or to elected officials or candidates for political offices.

Donations

In addition to our commitment to social projects, donations to organizations in the field of education and science are permissible as long as they are made voluntarily and without expectation of any service in return.

Sponsorships

The sponsorship of clubs in sports, arts and culture is permissible as long as it is granted voluntarily and all expected rewards are laid down in a contract.

Money laundering/terrorism

It is a matter of course for GW to play a preventive role in the international fight against money laundering and terrorism and to take measures within its own sphere of influence to counteract such criminal acts.

Fight against terrorism and sanctions lists

All GW business relationships are subject to ongoing screening for potential terrorist activities and checked against the appropriate sanctions lists.

Responsibility and obligation of our employees

4.

GW considers its employees to be the company's greatest asset, and their safety and satisfaction are top priorities for the company. As a family-owned business, GW traditionally sees itself as responsible for defining values as the basis for dealing with people both internal and external to the organization. Employees are required to comply with these regulations.

Public presence

The public perception of GW is also influenced by the way our employees present themselves in public, including the digital public. We always act in a friendly and service-oriented manner towards our customers and business partners and treat them with appropriate respect.

Conflicts of interest

We expect absolute loyalty to the company from our employees. Conflicts of interest must be avoided, and the supervisor or the Compliance department must be informed even if such a conflict is only suspected. A conflict of interest exists when employees' private or own financial interests conflict with GW's corporate policy or the relationship with business partners. When engaging in sidelines and acquiring an interest in business partners or competitors, care must also be taken to ensure that these do not constitute any conflict of interest.

Exercising a function in the works council or a trade union will not be regarded as a conflict of interest.

Granting and accepting invitations and gifts

In addition to statutory regulations, accepting or granting invitations and gifts is only permissible to the extent that these do not create the impression of improper influence. The prerequisite is that these are voluntary and are not accepted or granted expecting any service in return.

Confidentiality

Information about customers, partners, subcontractors, employees and competitors that is not publicly known will be treated confidentially and will not be disclosed to unauthorized third parties or used for private purposes.

Compliance with the Anticorruption Policy

All GW employees are required to strictly comply with the Anticorruption Policy associated with the Code of Conduct.

Trust

Thanks to a solid foundation, GW is independent and strategically focused on sustainable success. Achieving long-term goals clearly takes precedence over maximizing short-term profits.

GW is committed to its owners and employees, whose dedication and trust are essential to achieving its goals.

5.

Company property and plagiarism

Each employee is obliged to handle company property responsibly. Company facilities or objects must not be used for private purposes or removed from the company's premises without the express consent of the competent department. The assets of our companies include not only tangible assets/property, but also intangible assets (intellectual property including software products), information, and the ideas and knowledge of our employees. Each employee is responsible for protecting these company assets. Company assets may only be used for permissible business purposes, and under no circumstances for any unlawful purposes. Last but not least, the legal and internal security regulations (including those on occupational safety, guidelines on information security and data protection), which must be observed by every employee, serve to protect the company's assets and ultimately also to avoid liability claims. Using plagiarism knowingly is not permitted in any way.

Reporting

All reports must comply with legal requirements and internal guidelines and present a true and fair view of the company's situation.

Data protection

It is prohibited to process, disclose, make accessible or otherwise use personal data without authorization. Employees are obliged to comply with the provisions of data protection law and, in particular, to actively contribute to ensuring that personal data is reliably secured against unauthorized access. The collection, processing and use of personal data may only be carried out in strict compliance with the applicable provisions, to the extent this is necessary for a precisely defined purpose for the lawful performance of tasks. In cases of doubt, the data protection officer must be consulted.

Rules of conduct

Behavior within the company

All employees of the company contribute to a corporate culture characterized by fair and cooperative collaboration. Tolerance and trust in daily interactions are among the fundamental principles that the company's management and employees believe in. In addition, each employee is committed to behaving responsibly and with integrity. The personality and dignity of each individual must be respected. Mutual appreciation is based on everyone's inner conviction and willingness to act. This also means that problems in the workplace are addressed and solutions to problems are sought cooperatively. This is the only way to create an environment characterized by openness, tolerance and fairness.

Personal rights of the individual

We expect all employees to respect the personal dignity, privacy and personal rights of each individual. We will not tolerate discrimination (based on age, disability, gender, origin, nationality, political opinion, race, religion, etc.), sexual or other personal harassment or insults. Nor will we tolerate coercion or violence or the threat thereof. The company is committed to equal opportunities for all employees.

6.

Conduct towards customers, competitors and business partners

The company's reputation is shaped by the conduct of each individual towards customers, competitors and business partners. The company expects a fair, appropriate and professional conduct towards customers, competitors and business partners, without any favoritism or discrimination for personal reasons. The company fully complies with anti-trust laws and competition rules. Price fixing or other agreements with competitors are strictly prohibited. When communicating with competitors, employees will not discuss internal company matters, including prices, costs, organization and processes, or other confidential information. The company is committed to the principle of pursuing business objectives exclusively by legally and ethically sound means. We participate in competition by lawful and fair means. The obligation to observe the rules of competition law also applies to each individual employee. Colluding with competitors on prices and terms counts among the forms of conduct that constitute a cartel violation under all circumstances. The submission of sham offers that may affect the pricing of products or services is equally prohibited. Suppliers and business partners are to be selected exclusively on the basis of objective criteria.



Compliance with the Code of Conduct

GW's Code of Conduct is implemented at all company locations worldwide and must be observed by all employees. The validity extends to Gebrüder Weiss GmbH and its subsidiaries, provided that these are at least 50% owned by the group, and the management is incumbent on Gebrüder Weiss GmbH or persons or bodies appointed by it.

Compliance obligation

All members of the management, executives and employees of the GW Group are obliged to comply with the Code of Conduct. The responsibility for implementing these guidelines is borne from the top down.

Reporting violations

GW Group employees are required to report violations of laws or internal policies to their direct supervisor, another manager, the works council or the Compliance department. In addition, it is possible to report violations both internally and externally via a whistleblower system set up specifically for this purpose. All information submitted will be treated confidentially.

Protection of the whistleblower

GW will not tolerate actions against individuals who report actual or suspected violations of the Code of Conduct. In return, GW also reserves the right to take disciplinary action against employees who knowingly make false accusations.

Consequences

In the event of violations of laws or internal guidelines, labor law sanctions and disciplinary measures will be taken in the interests of the company, our employees and business partners, and society at large. In addition, any violations of applicable law that become known will be prosecuted under civil or criminal law.

More information

If you have any questions or require further information, please contact Compliance directly.