



Code of Conduct

of FRIGOSPED GmbH Internationale Spedition
and its affiliated companies

www.frigosped.de/compliance



We act with integrity and responsibility

Acting with integrity and responsibility

FRIGOSPED stands for “Providing Services”. In doing so all of our actions are aimed at responsible and sustainable value creation. We comply with the highest standards in regard to integrity, honesty and professionalism. We respect people and the environment and we are fair in dealing with our business partners, authorities and other institutions as well as other authorised parties. We distance ourselves from all persons and organisations with values and actions that are not in agreement with our code of conduct.

The code of conduct of FRIGOSPED and its affiliated companies is binding for all of us. That applies both to us as well as our managing directors and also for executives and staff members.

Whenever the male form is used in the following this also designates female and intersexual persons. Gender equality is fully safeguarded.



We observe laws

Observance of applicable law

We observe the laws and local regulations in all countries in which we are active. We comply with the company guidelines and ensure compliance of processes and their surveillance.

Our Code of Conduct establishes binding general conditions for our activities and defines the ethical conduct of all of our staff members.

Especially the managing directors and the executives serve as good examples in this respect. Here the code of conduct helps in making the right decisions.

It provides assistance and orientation in situations where correct conduct is uncertain and is supplemented by means of internal guidelines and instructions to all of our enterprises and sectors.

The principles contained therein define our company culture and remind us of the obligations to and expectations of our customers and all other business partners. Only if all of us act according to our code of conduct are we able to keep our promise with our services.



We respect human rights, diversity and equal opportunities and renounce discrimination

Obligation to observe human rights

Within the scope of our business activities, we respect internationally proclaimed human rights and fundamental freedom in accordance with the principles established in the UN Global Compact.

Renunciation of child labour

We renounce child labour, any form of forced labour and slavery as well as human trafficking.

Renunciation of forced labour and human trafficking

We renounce any form of forced labour or compulsory labour, slavery/servitude, (and) human trafficking, involuntary work or other forms of exercising power or oppression in the workplace environment and do not tolerate inhuman or degrading treatment or physical punishment.

Equal opportunity and renouncement of discrimination

We are committed to equal opportunity and do not tolerate any discrimination of persons, especially due to their descent, religion, sexual orientation, nationality, origin, political activities or activities in trade unions or because of their age, gender or a disability.



We respect labour and social standards

Freedom of association

We respect the core labour norms of the International Labour Organisation (ILO), especially forming interest groups and we are committed to the protection of these provisions in our business units.

Observance of working hours and work safety

The maximum working hours legally defined in the corresponding country and the statutory rest periods are observed.

Work safety is our priority. We promote and ensure a safe working environment.

We comply with the following:

- ✓ We observe the safety regulations at our workplace.
- ✓ We avoid risky behaviour.
- ✓ We recognize dangerous situations in due time and take action.
- ✓ We ensure expert and neutral inspections and sufficient training and instructions.



We ensure appropriate remuneration

Payment of an appropriate salary

An appropriate remuneration (basic need), not less than according to the statutory national minimum wage, is safeguarded. Women and men receive the same remuneration for the same work.

We observe all respective laws, regulations and standards in the field regarding wages and working hours. The wages and other compensation must at least correspond with the legal regulations and standards of the local production sites. They shall be clearly defined and regularly and also fully paid and/or rendered.



We protect the environment and promote sustainability

Environmental protection and sustainability

Based on our social and ecological responsibility, out of respect and the obligation toward the general public and the environment, we act sustainably. We comply with each of the respective environmental protection regulations.

We ensure that our operations correspond with the requirements of waste disposal law as well as emission and water protection. All regulations regarding hazardous materials are followed by us. That especially applies to storage, handling hazardous materials and their disposal.

We want to make our contribution by sustainable management and acting in an environmentally friendly and energy efficient manner as far as possible. Hereby we use the opportunities provided to us and are open for new and optimised work processes. We ensure that we are informed on the correct handling of hazardous materials and matter.



We protect our data and the data and property entrusted to us and ensure quality

Data protection

We observe all applicable laws for the protection of personal data, especially from our staff members as well as our business partners.

Property of the company and the property of our customers

We protect our company property and fulfil the purpose of the company. This also comprises our expertise, our vehicle fleet as well as our real estate and working equipment.

We also protect the property entrusted to us by our customers.

Quality

We measure our quality and customer satisfaction regularly.

“Competitive logistics requires that our services are further developed at all times based on the requirements of the customers and that the designation service is on all levels of our company distinctly understood as meaning “providing service”. Long term successful cooperation arises on this basis only.” – Bernhard Heinrich (Managing Director)

We combat corruption, money laundering and financing terrorism

Corruption

We combat any form of corruption, fraud, other manifestations of economic crime and any kind of violations of the law.

Invitations and gifts

Invitations in connection with our activity for FRIGOSPED and its affiliated companies may only be accepted or expressed within the scope of internal regulations if they are suitable and do not involve expecting an impermissible favour or other privileges in return. In case of doubt, we contact our corresponding superiors in advance. The same applies to accepting or allowing gifts and other benefits or advantages of any kind. We respect the point of view of our customers if they do not want gifts and other benefits.

Conduct toward public officials

Material and intangible benefits of any kind to public officials, employees or authorised parties of national institutions or to their relatives are strictly prohibited.

Combating money laundering and financing terrorism

We take all measures necessary to prevent money laundering in its sphere of influence. The same applies to financing terrorism.



We avoid conflicts of interest and comply with fair and free competition

Avoiding conflicts of interest

It is important that we make decisions only on the basis of due consideration of the facts. Our personal interest may not influence business decisions. Therefore, we avoid situations in which personal or own financial interests collide with our business interests or those of our business partner. In conflict situations the interests of our company may not be impaired. The compatibility of family and working life shall remain unaffected thereby.

Donations and sponsoring

Making a donation shall always be carried out transparently and documented. The donations may only be made on a voluntary basis and without expecting a favour in return. A sponsoring measure may not serve any undisclosed promotion of interest. It is permissible only in compliance with internal company guidelines (rules of the business).

Competition and anti-trust law

We observe the relevant competition law requirements and do not make any arrangements and agreement which influence the prices and terms and conditions or restrict fair competition in an impermissible manner.



Obligation to comply with the code of conduct

Obligation to comply with the code

All staff members, executives and all members of the management are obligated to comply with the code of conduct.

Obligation of the business partner to comply with the code

We expect our business partners to comply with the principles of this code of conduct during their cooperation with us.

Obligation of transferring the principles of the code of conduct to the supply chain

We expect our business partners to introduce comparable ethical principles themselves on the basis of applicable law and recognized values.

Enforcing consequences for non-compliance of the code of conduct

Our code of conduct establishes our values and rules. They are so important and violations against them cannot be tolerated.



Reporting violations and protecting whistle-blowers

Reporting violations against the code of conduct / Existence of a whistle-blower system

If you have information on possible violations against the code of conduct of FRIGOSPED and its affiliated companies or internal company guidelines or against valid law, you can point them out and report them. We will of course keep your notifications absolutely confidential and enable you to also indicate them anonymously.

Contacts for seeking advice or reporting indications are available over several channels:

- *Your executives*
- *Compliance official*
- *Online reporting system “Integrity Line”*
- *Compliance hotline*

The contact data and access data can be found on our homepage.

Protection of whistle-blowers

We do not tolerate any actions which are directed against staff members who report such violations.