



CODE OF CONDUCT - FOR EMPLOYEES

DECLARATION OF PRINCIPLES

As a part of the TGW world, where industrial and social entrepreneurship are equally lived and promoted, the TGW Logistics Group („TGW“) **takes responsibility for the people** who come into contact with it, **for society** and **for the preservation and protection of nature**.

Based on the company's philosophy „**Focusing on people – Learning and growing**“ as well as the company values derived from it, responsible, legally compliant and sustainable business practices are inextricably linked with TGW and thus a part of our DNA.

The management of TGW Logistics Group GmbH as the parent company of TGW Logistics Group controls the implementation of this Declaration of Principles and ensures, in particular through the compliance organisation, that every division within the group of companies assumes responsibility for compliance with the company philosophy and the company's values as well as for respecting human rights and the environment.



GENERAL INFORMATION

Compliance is not an obstacle to business success but it will support TGW in being successful in its processes and every business relationship. That is why we commit to comply with the present Code of Conduct.

This Code of Conduct is based on TGW's value system and, for the purpose of compliance, standardises the principles of conduct with which all employees of the TGW group are expected to comply, independent of their position in the company.

OUR PRINCIPLES OF CONDUCT

The following principles of conduct ensure long-term corporate success, provide orientation and are a guideline for everyone.



GENERALLY APPLICABLE RULES FOR OUR COLLABORATION

The general rules for our collaboration define how we treat each other, how we work and how we lead. Our compliance management system is only successful if it is based on our value system:

- We promote open-mindedness, passion as well as proactivity and we expect the employees to assume responsibility and to pursue goals. Individual responsibility and involvement of required colleagues in projects and decision-making processes are expected.
- We count on the success that is achieved in the team and set a good example for our colleagues. Mistakes can happen but shall be communicated openly and corrected together with the colleagues.
- The collaboration and the personal interaction between the executive management, the managers, team leaders and colleagues are shaped by respect, friendliness, kindness, open-mindedness, honesty and trust.

We treat each other equally and offer an environment in which all of us can find their place and develop themselves. Origin, age, religion, race, sexual orientation, gender, illness etc. do not lead to any disadvantage whatsoever and we consider diversity as an obligation and an opportunity. We promote diversity and tolerance since diversity leads to maximum productivity, creativity and economic success.

Any kind of violence, discrimination and unfair discrimination (e.g. harassment, threats, intimidation, improper pressure etc.) is forbidden and will not be tolerated.



INTEGRITY

■ **Standards for invoicing and reporting**

We will maintain financial, accounting and business records that fully and accurately reflect all the transactions and businesses in which we engage, according to applicable laws, accounting principles, policies and practices such as the valid IFRS standards.

■ **Quality**

We are constantly working on improving our products and services. Thus, it is very important to evaluate and adapt the state of our internal processes, products, ideas etc. The professional development of employees is promoted and expected.

■ **Conflicts of interest**

We make decisions exclusively in the best interests of the company. Any conflicts of interest in relation personal matters or other business or non-business activities, including those of relatives or other related parties are handled professionally and transparently. Conflicts shall be handled openly and transparently.

■ **Fair competition, responsibility in the value chain and compliance with the law**

We comply with the law and other internal as well as external regulations, guidelines and standards. We commit to the principles of fair competition. We do not tolerate or consider corruption, bribery and cartel agreements as a means to implement projects and to operate successfully. We refuse to grant or accept any kind of concessions or benefits if they violate the law or are inappropriate or immoral. Gifts are given and received and invitations are extended and accepted only in accordance with our internal guidelines. Any identified misconduct will be disclosed.

Illegal actions in whatsoever form must not be taken. It is completely irrelevant whether these actions are directed against colleagues, partners, third parties or TGW (e.g. breach of trust, embezzlement, fraud, wrongful trading etc.). In this context it should be noted that non-disclosure can also be illegal.

We also expect our business partners to act with integrity. We take our responsibility in the value chain very seriously. In this context, we define minimum standards for cooperation in which human rights, respect for the environment, responsibility in and for society, legally compliant and fair treatment of employees and compliance are important criteria. We regularly check compliance with the minimum standards.

■ **Protection of company property**

The private use of the company's property (e.g. working services, equipment, operating supplies, auxiliary means, buildings etc.) is not allowed unless otherwise regulated. Everyone is obliged to use the company's property properly and with care and to report any damages or loss immediately.

■ **Protection of intellectual property**

In order to protect the success of our company, we are obliged to treat all information as well as business and trade secrets confidentially and to protect them from unauthorised use by third parties. When using and processing confidential information, we ensure compliance with a need-to-know principle and trust in the careful handling of our own secrets as well as secrets revealed to us.

■ **Data protection**

We commit ourselves to handle personal data of natural persons trust fully and carefully. Everyone is obliged to maintain the protection of personal data, to adhere to TGW's guidelines and to take part in appropriate training courses.



BEHAVIOUR IN SOCIETY AND FOR SOCIETY

■ ESG and corporate social responsibility

We act in accordance with the applicable laws and we are committed to environmental protection as well as workplace safety and human rights.

For this reason, we signed the United Nations Global Compact and base our commitment on the UN Guiding Principles on Business and Human Rights. We expressly state that we also take into account the OECD Guidelines for Multinational Enterprises as well as the principles of the International Labour Organization (ILO) when making decisions and taking measures. We act in accordance with the applicable laws.

Sustainability and assuming responsibility to society are essential in defining our technical, economic and social objectives. Any violation of these principles, in particular of the prohibition of slavery, forced and child labour, will not be tolerated under any circumstances and will lead to appropriate measures.

The protection of the environment, resource-saving use of raw materials, energy efficiency and sustainable innovations play an essential role in all our economic, social and entrepreneurial considerations.

■ Behaviour in public

We explicitly respect the right to free speech and the protection of personal rights and privacy. However, everyone should be aware that negative behaviour in private matters might have a negative impact on the company/company group. We are obliged to protect the company's reputation and to refrain from damaging it.

This also includes the use of and communication via social media. Any posts reflect only the personal opinion of the person who posted them. Official statements of the company are the responsibility of the management board or explicitly authorised persons (e.g. marketing). That is why the TGW logo (or other identification features) must not be used without authorisation or prior consent.



ORIENTATION

We are expected to behave in accordance with the principles above and check all our actions and non-actions on our own responsibility with regard to the compliance with our principles.

- Is my action (or non-action) or decision legal?
- Is my action (or non-action) or decision in adherence to our principles?
- Is my action (or non-action) or decision free of personally motivated interests?
- Does my action (or non-action) or decision stand up to public/judicial scrutiny?
- Does my action (or non-action) or decision protect the reputation of TGW as a company/company group?

If these questions are answered with „yes“, it can be assumed that the principles of conduct are not violated.

If there are doubts as to the correctness of one's actions or those of others, all employees are invited to contact their managers, the responsible Compliance Officer and/or the Group Compliance Officer. Managers are obliged to inform the responsible Compliance Officer or Group Compliance Officer directly about any reported or identified compliance violations.

Reports are handled according to a standardised process. This builds trust and ensures that everyone is treated equally.

TGW's whistleblower system „**TGW – integrity line**“ is available for reporting any misconduct. Reports can be submitted either anonymously or with contact details. No one has to worry about negative consequences when submitting justified reports. We believe, our whistleblowing management system contributes to the future success of the company. (**Whistleblowing**)



SANCTIONS

- In connection with the violation of our code of conduct we pursue a **zero-tolerance policy**. This also applies to everyone who is responsible for not disclosing breaches they are aware of. We will take appropriate measures in any case.
- These measures range from work instructions (e.g. trainings), consequences under labour law (e.g. warnings, dismissal) and the adaptation of internal processes to the termination of contractual relationships, the termination of partnerships and reports to the authorities.

Compliance is a matter of heart and mind at TGW. Compliance concerns us all.

COMPLIANCE BEI TGW – MIT HERZ UND HIRN

