



CODE OF CONDUCT – SUPPLIERS

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 partners adhere to the following principles.

This Code of Conduct is the basis for a successful business relationship and thus an integral part of all legal transactions involving TGW.



PURPOSE/FIELD OF APPLICATION

We understand compliance as an essential measure to ensure integrity and sustainable entrepreneurship as well as a classic obligation to adhere to general legal conditions. The present Code of Conduct shapes our generally applicable rules for successful and trusting cooperation. By describing our principles of conduct, we ensure that TGW cooperates with its partners in a legally secure and responsible manner

Our requirements are based on recognised (national and international) standards, guidelines and conventions, in particular the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the relevant conventions of the International Labour Organization (ILO). Our quality, passion and sustainable business activities are what set us apart from the competition.

GENERAL INFORMATION

Compliance is not an obstacle to business success but it will support TGW and its partners in being successful on the long run. Our partners therefore expressly undertake to comply with the following principles in the context of any cooperation.



PRINCIPLES OF CONDUCT

Our principles of conduct provide guidance for a successful cooperation with TGW.

■ Equal opportunities/human rights

We treat each other equally and promote diversity as well as tolerance, since diversity leads to maximum productivity, creativity and economic success. Our partners do not discriminate against anybody and respect and protect the applicable regulations regarding the protection of human rights, in particular the **prohibition of slavery, child and forced labour**.

Origin, age, religion, race, sexual orientation, gender, illness etc. do not lead to any disadvantage whatsoever. Our partners commit themselves to maintaining a working environment free from any harassment and/or discrimination.

■ Freedom of association/safety at work/minimum wage

We provide a people-oriented work environment. Our partners grant their employees the necessary freedom of association – i.e. the possibility to establish employee representations – and comply with the legal and contractually agreed requirements concerning health and safety at work.

Our partners guarantee and pay their employees an adequate and legally compliant remuneration.

■ Environmental protection/sustainability

We believe in sustainable entrepreneurship. Our partners take responsibility for the environment. Sustainable entrepreneurship and the careful use of resources are part of all technical, social and economic considerations and actions of our partners. The use of substances and materials that are hazardous to the environment and health must be avoided.

„Greenwashing“ violates these principles and will not be tolerated under any circumstances.



- **Standards for invoicing and reporting**

Our partners maintain transparent financial, accounting and business records that fully and accurately reflect all transactions and businesses in which they engage, according to applicable laws, accounting principles, policies and practices.

- **Professionalism/product safety**

We promote and expect professional performance of services. Our partners adhere to all applicable legal regulations on product safety and requirements, especially legal requirements regarding safety, identification labels and packaging of products as well as the use of dangerous materials and substances.

Furthermore, they meet the valid quality standards and are constantly working to improve their products in the spirit of this declaration.

- **Compliance/fair competition and compliance with the law**

Compliance at TGW – with heart and mind. Our partners have a compliance management system and abide by the laws that apply to them. They commit to the principles of fair competition and do not form cartels. Corruption, bribery and cartel agreements are not a means to implement projects and be successful together. We do not accept any kind of concession or benefit that violates applicable legal provisions and the general understanding of integrity.

Illegal actions in whatever form must not be taken (e.g. money laundering, breach of trust, fraud, wrongful trading etc.). This also includes compliance with export-relevant regulations and export controls (compliance with and consideration of embargos etc.).

- **Protection of company and intellectual property**

We respect the property of others. The inadmissible use of third-party company property (e.g. patents, know-how, trade secrets, other industrial property rights etc.) will not be tolerated. Our partners commit themselves to handling third-party company property as well as business and trade secrets in a legally compliant, careful and appropriate manner.

- **Data protection**

Our partners commit themselves to processing personal data of natural persons trustfully and carefully.

- **Responsibility in the value added chain/supplier chain**

We take responsibility in our value creation and thus in our supply chain. Our partners undertake to maintain and ensure the agreed principles of conduct also along their own supply chain and value creation.

- **Whistleblower protection**

We appreciate and protect our whistleblowers. Our partners meet the legal requirements for the protection of whistleblowers and enable verbal, written and personal reports.

The timely, trustworthy and secure processing of incoming reports is a prerequisite.



TGW – BUSINESS PARTNER COMPLIANCE

We are invited and entitled to check our partners' compliance with the above-mentioned principles at any time and to assure ourselves of the conformity of the measures with our principles of conduct within the framework of corresponding audits.

Furthermore, our partners inform us about their measures concerning topics that are important to us, regularly maintain the data they enter, complete their documentations and are available in case of questions as part of **TGW – Business Partner Compliance**. Our partners report any detected misconduct using the **TGW – integrity line**.

The – **positive** – status determined by us and guaranteed by our partners is the basis for any collaboration. Any deterioration of the status and/or any non-compliance with the agreed principles will be remedied by our partners within a reasonable period of time and at no cost for TGW.

Our partners assess the compliance status in their value chain and ensure a high minimum standard in terms of integrity and responsible and sustainable entrepreneurship when selecting their suppliers.

ZERO TOLERANCE

We pursue a **zero-tolerance policy**, which means that appropriate measures will be taken if our principles are violated. This includes in particular the possibility of compensatory damages, an extraordinary termination of contractual relationships as well as the reporting of relevant conduct to the responsible authority.

Our partners take responsibility for their supply chain and hold harmless and indemnify TGW in connection with claims by third parties based on the violation of the abovementioned principles.

Compliance concerns everybody. We set a good example together.



COMPLIANCE BEI TGW – MIT HERZ UND HIRN



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