

# CODE OF CONDUCT

Code of Conduct of the

GETRA Logistics Deutschland GmbH & Co. KG  
GETRA Logistics Austria GmbH & Co. KG  
GETRA Logistics International GmbH  
(hereinafter referred to as „GETRA Logistics“)

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## Foreword

The name **GETRA Logistics** stands for innovation in the development and implementation of all types of transport.

The product range includes the planning and execution of transport orders for the transportation of all types of goods. Customized logistics solutions represent a core competence of our company. This means that we continue to focus on innovative and reliable services, without forgetting the people who do the work.

We put people first.

This enables us to ensure that our employees identify fully with our company. Only in this way can we guarantee the highest quality of service and reliability at a reasonable price.

It is one of our corporate principles to reconcile business practices with ethical values and social responsibility.

Our goal is to provide all customers with reliable services and high-quality products that fully meet their expectations. Likewise, our services and products should meet today's requirements in terms of ethical conduct, safety, legal compliance, anti-corruption, fair competition and sustainability.

The international nature of our markets requires that our business activities have to take into account legal regulations and ordinances that may vary from country to country.

The following Code of Conduct serves as a guideline for our employees and managers in their decision-making and business activities.

We expect them to observe these principles, to comply with all laws and regulations, and not to abuse the trust placed in us by our suppliers, customers and authorities.

By signing the Code, we commit ourselves to the implementation of and unconditional compliance with the Code of Conduct.

Deggendorf, 01.01.2022

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Stefan Grassl (General Manager)

**Annotation:**

In this text, we have refrained from using gender-specific wording for the sake of easier readability. However, both genders are always addressed in the sense of equal treatment.

## 1. Principles of our ethical conduct

### 1.1. Our core values

We respect the personal dignity, privacy and personal rights of our employees and colleagues as well as our business partners. Our workplaces are free from discrimination based on age, gender, sexuality, health, national origin, and religious or cultural differences. Our employees deserve mutual respect within the company.

We reject any form of forced labor, child labor and exploitation of workers.

We offer our employees a challenging, communicative working environment that enables them to develop personally and professionally. At the same time, we pay equal attention to the development of social skills. In addition to comprehensive basic training, we ensure that employees receive specialized advance training.

We expect our employees to show loyalty to the company, a high level of commitment and the willingness for personal advancement.

Environmental, health and occupational safety are an integral part of our corporate culture.

It is our social and societal responsibility to ensure that we:

- carry out our activities in an environmentally sound manner
- use resources such as energy and water responsibly
- use our buildings and properties sustainably
- offer our employees a safe and attractive working environment
- promote a healthy lifestyle and social cohesion

## 1.2. General rules of conduct

The principles of conduct are an integral component of the corporate culture of the GETRA Logistics Group. Integrity starts with management. Through their exemplary personal conduct and social competence, our managers are to convey the contents and significance of our Code of Conduct to their employees and support them in implementing it. By becoming aware of the Code of Conduct, each employee bears personal responsibility for compliance with these principles.

The principles of conduct apply both within the company and to our business partners.

Every employee is entitled and required to report violations of the Code of Conduct or of laws and regulations to his direct superior. They are obligated to treat the report as strictly confidential and to follow it up carefully. A report in this regard must not cause any employee a disadvantage in the company.

New employees are made aware of the GETRA Logistics Code of Conduct as part of their training. With their signature, they confirm that they will always observe the rules of conduct.

## 1.3. Compliance with laws

Compliance with applicable laws and regulations at the national, European and international level is the basic principle of the forwarding agent GETRA Logistics.

Every employee, regardless of his position in the company, is obliged to observe and act in accordance with the internal rules of conduct (such as circulars or work instructions) as well as all legal regulations in his area of responsibility.

In case of questions regarding legal regulations, the management must be consulted.

In the event of deliberate violations of these principles, each employee must expect disciplinary consequences, regardless of possible civil or criminal consequences.

## **2. Behavior in the workplace**

In everyday professional life, it is often necessary to decide whether certain behavior is appropriate or not.

If an employee has to deal with the assessment of a sensitive situation, the following questions may help make the right decision:

- Do I act according to the law?
- Is my action in accordance with the Code of Conduct?
- Do I make decide in the interests of the company or out of personal interests?
- Would my decision stand up to public scrutiny?
- Could my action or decision jeopardize the company's reputation?

### **2.1. Documentation of business transactions**

Each business transaction (e.g., transport order, supplier order, customer order, etc.) must be documented properly and completely, in accordance with internal processes as well as legal requirements.

### **2.2. Observance of creditworthiness**

For each new customer a credit check is carried out by the finance department. Potential interested parties or new customers must be reported to the finance department by means of a „creditworthiness inquiry“.

Orders may only be accepted, if the creditworthiness of the customer is proven.

### **2.3. Consumption of alcohol and drugs**

The consumption of alcohol and drugs is prohibited during working hours and work breaks.

Employees who appear at work under the influence of alcohol or drugs will be expelled from their workplace. They will also face disciplinary consequences (formal warning, dismissal in case of recurrence), as well as employees who violate the alcohol and drugs regulations.

We appeal to your personal responsibility to avoid the regular consumption of alcohol in the interest of your health and to refrain from the use of drugs in general.

### **3. Avoidance of conflicts of interest**

The employees of the forwarding agent GETRA Logistics are committed to making their business decisions always in the interest of the company and not on the basis of any personal interests.

A conflict of interest exists when a decision that would be best for the company conflicts with personal or private interests and can therefore no longer be taken without prejudice. In this case, the employees concerned are obliged to consult their immediate superior.

A conflict of interest also exists if invitations or gifts go beyond normal business boundaries.

In order to prevent conflicts of interest basically, employees of the forwarding agent GETRA Logistics are strictly prohibited from engaging in competing activities or businesses.

### **4. Dealing with external partners**

#### **4.1. Fair and respectful treatment**

We always treat customers, suppliers and authorities fairly and respectfully.

#### **4.2. Fair competition**

We are committed to fair competition in compliance with competition law and antitrust law. For our employees, this means that agreements with competitors, in particular with regard to prices, capacities, sham offers in tenders or non-competition, are strictly prohibited. We expect our business partners to take responsibility for ensuring fair competition.

#### **4.3. Anti-corruption**

We want to acquire our customers solely through the quality of our services and products. Therefore, all employees are strictly prohibited from promising or granting monetary payments, inappropriate gifts, other benefits or favors to third parties in order for these companies to favor the forwarding company GETRA Logistics in an anti-competitive manner.

By third parties, we mean in particular suppliers, customers, authorities, lobbyists and private individuals.

Likewise, no employee may take advantage of his position in the company. Failure to comply with this provision shall be deemed to be an intentional breach of the company's interests.

#### **4.4. Giving and accepting gifts**

The acceptance or demand of inappropriate gifts, financial benefits, commissions and other advantages or favors is strictly prohibited. In principle, gifts or invitations must not influence our business decisions. They must be appropriate to our business activities, must not violate applicable law and must be in line with general market practices in the industry or country.

Failure to comply with this provision shall be deemed to be an intentional breach of the company's interests.

#### **4.5. Donations and sponsorship**

The forwarding company GETRA Logistics selectively supports:

- social institutions, associations and social projects in the region of Lower Bavarian.
- local sporting and cultural events

In addition, employees of GETRA Logistics are supported in emergency situations. As a matter of principle, no donations are made to political organizations, parties or individuals. The decision on donations and sponsoring is made exclusively by the management.

### **5. Dealing with company property**

Our employees are required to use our company property such as office and service rooms, storage rooms, office facilities, parking lots, all technical equipment such as computers, telephones, copiers, printers, software and other work equipment such as company cars, trucks, cell phones or fuel cards carefully and exclusively for company purposes at all times.

### **6. Information handling, data security and data protection**

All employees are committed to an open, truthful and complete exchange of work-related information and knowledge within the company. This does not apply to information that is subject to confidentiality. We encourage our employees to openly address issues or concerns in this regard without fear of sanctions.

Confidentiality shall apply to business secrets and confidential information. They may only be used for business purposes and may not be disclosed to third parties. This obligation also applies after termination of the employment relationship.

The forwarding agent GETRA Logistics handles the data of its employees as well as its customers and suppliers strictly confidentially and with the utmost care.

We collect and use customer and supplier data solely for the purpose of being able to reliably process our customer orders in accordance with the requirements. The acquisition of data is based on the legal regulations.

The servers of the GETRA Logistics Group are equipped with access control and optimally protected by burglar-proof doors, electrostatically conductive floor coverings, an early fire detection system, a redundant power supply and state-of-the-art air conditioning.

Two spatially separated servers with parallel running systems, as well as virtual servers, ensure a largely fail-safe execution of customer orders.

When processing data, the legal provisions of data protection are bindingly observed.

Every employee is obliged to comply with the provisions of data protection law as well as the internal company regulations on data security.

## **7. Health and occupational safety**

Safety in the workplace is an integral part of our social responsibility. Therefore, we ensure that our employees are offered a safe and healthy working environment and that the respective guidelines for occupational safety, health, fire and environmental protection as well as customer-specific safety requirements are correctly observed. Each employee shares responsibility for compliance with these guidelines in his work environment.

As part of a continuous improvement process, our aim is to continuously improve the jobs of our employees, as well as to increase job satisfaction and health through preventive and health-promoting measures.

## **8. Environment**

One of the main goals of the forwarding company GETRA Logistics was and still is to shape all company activities in such a way that the impact on the environment is as low as possible.

As part of our environmental management, we ensure responsible use of resources such as energy and water, as well as sustainable use of our buildings and properties. A series of measures at our locations, such as the environmentally compatible procurement of products and services, the optimization of energy consumption and energy controlling, as well as monitoring of emissions, ensure that we continuously improve our procurement and work processes in line with our ecological responsibility.