



Code of Conduct

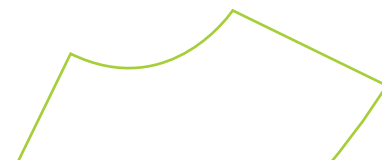
Suppliers

Declaration of Principles

The combination of business success and appreciative interactions plays a central role at TGW LOGISTICS. The value system is the basis for how we interact with each other and for our continued success in the future. As a part of the TGW world, where industrial and social entrepreneurship are equally lived and promoted, **TGW LOGISTICS takes responsibility for the people** who come into contact with it, **for society** and **for the preservation and protection of nature**.

We comply with applicable laws, orient ourselves according to internationally recognised standards, and ensure that risks and violations relating to the protection of human rights and the environment are identified promptly, evaluated and prevented in the future. Affected people receive access to our whistleblower system, which in turn gives us the opportunity to minimise risks.

Clear statement: we consider the **respect, promotion and defence of human rights** to be natural and indisputable, and therefore a central element of our corporate responsibility. This also applies to compliance with necessary environmental standards and the **protection of the environment**.



The top management of TGW LOGISTICS controls the implementation of this Declaration of Principles and of the Code of Conduct. It 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.

As a value-based company and **member of the UN Global Compact**, we publicly pledge to protect human rights. This includes in particular (but is not limited to):

- 📌 prohibition of child labour
- 📌 prohibition of slavery and human trafficking (in any form whatsoever)
- 📌 adherence to fair working conditions
- 📌 reinforcing and upholding the freedom of association
- 📌 prohibition of discrimination based on age, disability, illness, religion, social background, ethnic or cultural differences, gender, sexual orientation and/or identity

We base our commitment on the UN Guiding Principles on Business and Human Rights as well as the ECD Guidelines for Multinational Enterprises.

We expressly state that we consider the principles of the International Bill of Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO) when making decisions and taking measures, and that we act in accordance with the applicable laws.

We expect this same attitude from our business partners, and also demand complete cooperation in this regard when it comes to identifying, evaluating and minimising risks.

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 LOGISTICS 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 LOGISTICS 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 LOGISTICS.

- ✦ 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.

(Equal opportunities/human rights)

- ✦ 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. (Freedom of association/safety at work/minimum wage)

- ✦ We believe in sustainable entrepreneurship. Our partners assume responsibility for the environment (protecting the flora and fauna). 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. (Environmental protection/sustainability)

- ✦ 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. (Standards for invoicing and reporting)

- ✦ 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.

(Professionalism/product safety)

- ✦ 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, sanctions, etc.). (Compliance/fair competition and compliance with the law)



- ✎ 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. **(Protection of company and intellectual property)**
- ✎ Our partners commit themselves to processing personal data trustfully and carefully. **(Data protection)**
- ✎ 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. **(Responsibility in the value chain/supply chain)**

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. **(Whistleblower protection)**

TGW – Business Partner Compliance

We are invited and entitled to check our partners' as well as their contracting parties' 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 – whistleblowing (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 LOGISTICS.

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.

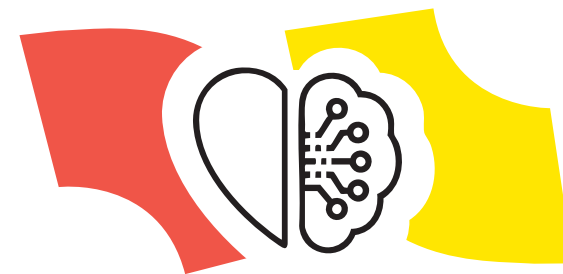
Zero Tolerance

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 LOGISTICS 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 at TGW: with Heart & Mind



CEO Henry Puhl

CFO Clemens Bauernfeind

CTO Christoph Wolkerstorfer