

COMPLIANCE

# CODE OF ETHICS

Steinbach GmbH & Co Spedition KG

---

# Code of Ethics (Code of Business Conduct)

## Our Commitment

Our business principles and our company's ethical guidelines are defined in the following document. We are aware of our responsibilities to the community at large and we act accordingly.

This Code of Business Conduct gives our staff clearly defined guides to behavior in different situations. At the same time, it helps our business partners to better understand our values.

We pledge to hold ourselves to high ethical standards and to act justly and legally. We honor all laws, legal requirements, and internationally recognized labor and social standards.

## Values

### Integrity

Uphold ethical standards, fulfil our responsibilities, and demonstrate honesty in all actions.

### Competence

Recognize our employees as the foundation of our success. Rely on all employees to have a positive impact and to accept responsibility for their actions.

### Teamwork

All personnel work reliably and politely with each other and of course with our customers, too.

### Continual Improvement

Create a corporate culture that advocates change and renewal, and implements improved processes.

**Workplace Fairness** Promote an equal opportunity environment, and treat all work colleagues with respect and dignity.

## Guiding Principles

- Statements must be truthful.
- Promises must be kept.
- Unpretentiousness, sincerity, fairness, integrity, and respect for others are the core values of Steinbach Spedition.

## Report Concerns

All employees have the responsibility to report suspected or potential violations of our Code of Business Conduct or company policies. This can occur anonymously, through the company's internal anonymous post box.

## Conflicts of Interest

Employees are not allowed to have relationships or business connections with suppliers, sales agents, distributors, customers, or competitors. Connections can influence decision-making and therefore must be disclosed to the manager and be given prior approval.

## Equal Opportunity at the Workplace

Every employee plays an important role in the creation of a positive work environment that promotes fairness and respect. Our company is committed to a workplace free of all forms of illegal discrimination. Our firm values equal opportunity for every employee and therefore will make all work-related decisions on the basis of professional qualifications and without reference to legally protected characteristics like age, skin color, disability, national origin, geographic background, religion, relationship status, or gender.

## Data Protection

Every employee is responsible for discretion and security measures relating to all personal data and any information concerning business practices. We collect, use, and store personal data, and will take disciplinary or legal measures when secure data practices are misused. Furthermore, we have taken steps to protect this data from unauthorized access.

## Harassment and Bullying

All Steinbach employees have the right to a safe workplace. Therefore we will not tolerate harassment or bullying at the workplace, whether in written, verbal, physical, or visual form. Harassment of any kind, including discriminatory language and behavior, is strictly forbidden. Harassment and bullying includes: comments that refer to someone's skin color, gender, national origin, age, religion, disability, relationships; inappropriate physical contact; inappropriate jokes; threatening, intimidating, or insulting actions; as well as the sharing or distribution of offensive pictures at the workplace.

## Workplace Safety

Our company is responsible for promoting and maintaining a safe workplace. Therefore all aspects of our operations related to workplace safety need to comply with the applicable laws, regulations, and company policies. All employees must be familiar with, understand, and uphold the safety precautions and security guidelines related to their employment. Steinbach is responsible for the complete safety of all company facilities. We allow only authorized persons access to our buildings and property.

## Drug- and Alcohol-free Workplace

In accordance with our responsibility for a safe and healthy work environment, Steinbach requires a workplace free of illegal drugs and alcohol. Substance abuse affects performance and violates our safety standards. During working hours: zero tolerance. This means that the blood alcohol concentration at the beginning of the work day must be at zero. The same requirement stands when a member of staff is representing the company outside of company property. Possessing, consuming, selling, distributing, or encouraging the use of illegal drugs, prescription medicines, controlled substances, or alcohol is prohibited on all company properties. Every violation of this guideline will result in disciplinary consequences up to and including dismissal.

## **Recognition and Avoidance of Bribery and Corruption**

All transactions with customers, suppliers, and business partners are impartial, free of outside influence, and follow our business guidelines. We neither offer nor receive improper payments to or from anyone. Unacceptable payments include money, presents, discounts, trips, external courtesies, and hospitality that could be understood as bribes or kickbacks.

The awarding of gifts or hospitality can lead to the impression that business decisions are made on factors that have nothing to do with fair business practices. For this reason, we are alert and skeptical when we offer or receive corporate presents or hospitality. We must be sure that every gift or other benefit offered or received is appropriate and in compliance with company guidelines.

Avoid all gifts or benefits that contribute to the appearance of partiality or a loss of objectivity among the involved parties.

## **Fair Competition**

Under no circumstances does our company allow the offer or payment of kickbacks, payoffs, illegal discounts, or improper compensation in return for business. We promote fairness, in that we acquire competitive information legally and honestly.

## **Cooperation with Clients and Protection of Clients' Data**

All customer relationships must be fair, transparent, trustworthy, and legally correct, and take place under ethical principles. Sometimes our customers entrust us with confidential information in order to be supplied with optimal goods or services. It is solely our responsibility to use and store this information in compliance with relevant privacy laws. We must take all necessary measures to secure customer data and to ensure that this information is used only for legitimate business purposes.

## **Collaboration with Suppliers**

The decision of our firm to buy goods and services from our suppliers must be based on quality, service, cost, and sustainability. Transactions with suppliers must not be coupled with the receipt or expectation of personal advantage. Steinbach appreciates its business relationships with its suppliers and strives to acquire the best available goods and services at the best available price.

## **Responsibility to our Clients and Suppliers**

Our company strives for fairness and transparency in every interaction with business partners, customers, and suppliers. We don't tolerate any form of forced labor or human trafficking in our supply chain, production, or product distribution. We abide by all laws regarding child labor and expect this from our partners, too. We expect all suppliers to adhere to the terms of our Code of Business Conduct in regard to labor and human rights, health and safety, the environment, and fair markets.

## **Responsibility to the Environment**

We strive to protect the environment through the organization of our operating processes. We fulfil all relevant environmental regulations in order to minimize environmental damage and to protect natural resources. Our commitment to the environment is documented through certification in the best practice norms of

environmental management. In every business endeavor and decision-making process, the environmental impact and related risks will be considered.

## Donations to Political Parties

We should all strive to be engaged citizens in our communities. Our participation in these activities, however, should be done at our own leisure and at our own cost, conforming with our Code of Business Conduct. You may not represent Steinbach at political or community events unless you have the prior consent of your manager. We are not allowed to support any specific political party in the company's name, which includes donating money to political parties in the name of the company.

## Call to Action

What to do if:

You observe, commit, or hear of a potential violation of this Code of Business Conduct

You confirm the loss of company equipment or documents containing confidential information

You believe that someone has inappropriately gained access to company property

You believe that someone is offering or receiving improper payments

You are unsure whether company gifts, hospitality, or other benefits should be offered or received

You suspect that a supplier is violating these guidelines

You have experienced a near-accident

>> You as the employee must report this to your manager immediately

>> You as the customer or supplier should address your concern to your company contact or to company management

>> You as an external observer not belonging to the above-mentioned groups should inform the company's management.

Employees with doubts or questions regarding any act of non-compliance, please talk to your manager.