FIEGE

The FIEGE Code of Conduct

Shared principles for a responsible and lawful conduct within our family business

www.fiege.com

Responsibility, respect, and trust

Dear Colleagues,

This Code of Conduct is intended for us all. It describes the standards that we prescribe to here at FIEGE – and stands for the fundamental values of our family business: loyalty and trust, responsibility and excellence, passion and joy. These values form the basis of our success. They serve as a compass, to guide us in how to act responsibly towards colleagues, clients, partners, competitors, and society. We commit ourselves to giving it our best, always.

We are convinced that this is the only way to be the best-possible employer, business partner, and service provider. Through our daily actions, we all contribute to securing the excellent reputation and, ultimately, the success of FIEGE. Naturally, the Code of Conduct does not precisely lay out how we should conduct ourselves in every single situation, yet it provides us with principles and guidelines that help us to navigate an ever-more complex world.

Ignoring these guidelines may cause considerable harm to our company. We therefore ask that you act responsibly in accordance with this Code of Conduct and embody our values, thereby securing the future success for us all.

Felix Fiege and Jens Fiege

“If we manage to incorporate morals and ethics into our business activities, we will be successful.”

Daniel Goeudevert
French writer

Content

	The Importance of the Code of Conduct	**6**
1.	**Fundamental Rules of Conduct within our Company**	**8**
1.1	Equality of treatment	10
1.2	How to treat company property and other assets	11
1.3	Sustainability	12
1.4	Health and safety in the workplace	13
2.	**Compliance with Laws and Practices of Fair Competition**	**14**
2.1	Tax laws	16
2.2	Fair competition and compliance with national and international provisions	17
3.	**Conflicts of Interest**	**18**
3.1	Secondary employment	20
3.2	Stakes in competitors, clients, suppliers and other business partners	21
3.3	Employment of related persons	22
4.	**Conduct Towards Business Partners, Clients, Suppliers, and Third Parties**	**23**
4.1	Relationships with our business partners	25
4.2	Undue advantage	26
4.3	Contributions	27
4.4	Donations, sponsorships, and corporate memberships	28
5.	**Handling of Information**	**29**
5.1	Protection of our intellectual property	31
5.2	Online etiquette	32
5.3	Data privacy	33
5.4	Information security	34
5.5	Relationship with the authorities	35
5.6	Reporting	36
6.	**How to Implement the Rules of Conduct**	**37**
6.1	Review your decisions and actions	39
6.2	Responsible persons	40
6.3	Fiege Trust Centre	41

The importance of the Code of Conduct for the company and each and every one of us

Our Code of Conduct is a guide to a lawfully and ethically appropriate conduct in the workplace, and beyond. It outlines the relevant legal framework and standards.

The Code also describes the expectations that our business partners and other stakeholders have of us. Last but not least, the Code describes our company's system of values.

The rules set out in this Code represent a guide for ease of orientation regarding for the conduct of everyone working at the company – be they trainees or members of the Executive Board.

We as a company, and every one of us individually, are responsible for ensuring that the rules set out in the Code are complied with.

We expect compliance with the principles of this Code of Conduct when working with our business partners, but especially also with our clients and suppliers.

To secure compliance with the rules under the Code of Conduct, we have installed a principal Trust Centre. Furthermore, employees may approach their respective national trust centre or the appointed local contacts who carry out the duties assigned to the principal trust centre. The FIEGE Trust Centre offers assistance with all queries, questions and concerns associated with the implementation of the rules governed by the Code of Conduct.

Central topics in the FIEGE Code of Conduct

- Fair and free conduct on markets
- Rights and responsibilities
- Avoidance of conflicts of interest
- Fight against corruption
- Social responsibility
- Occupational safety, health, and environmental protection
- Handling of information
- Protection against discrimination, sexual harassment and insult
- Equal opportunity and tolerance

1.

1. Fundamental Rules of Conduct within our Company

We are a family business that operates internationally. We work with people of different nationalities, cultures, and colour. We are very proud of this.

We respect the personal dignity, privacy, democracy-imbued views and personality rights of all employees, job applicants, and business partners. This forms the very basis of our working together. We endorse the fundamental principles of the United Nations Universal Declaration of Human Rights.

Our employees and partners have the unconditional right to a respectful, courteous, sincere, and fair interaction. We do not tolerate any form of unfairness based on ethnicity, a disability, age, gender, religious affiliation or sexual identity. There is no space at our company for discrimination, sexual harassment, or insults. We commit to providing equal opportunities when supporting the professional growth of our employees.

Maintaining and promoting good health amongst our employees constitutes a key imperative of our actions. Safety at work therefore is paramount.

It is a long-standing tradition of ours to fight for the preservation of nature. The sustained growth of our company is based on the protection as well as the resource-preserving treatment of our environment. We commit to the institutionalisation and ongoing intensification of our efforts in this domain.

Moreover, we protect our company's property, be it of tangible or non-tangible nature, against damage, loss or improper use, for it to be fully available to our employees and their responsibilities even in future.

We except our employees to comply at all times with the governing law, as well as the rules set out in this Code of Conduct. We naturally expect likewise from our partners.

Example:

A female colleague working at the warehouse is being catcalled by several male colleagues. The colleague concerned ignores the incident and continues to do her work. You witness this situation. What do you do?

→ Our company has zero tolerance for sexual harassment in any form whatsoever. All employees – male and female – are obligated to treat each other with respect and fairness. You should openly address the issue with your superior or bring it to the attention of the FIEGE Trust Centre. [1]

[1] Any reference in this Code of Conduct to the Trust Centre equally also refers to the individual national centre or local contacts who likewise carry out the duties of the Trust Centre and are therefore equally available.

1.1
Equality of treatment

It is our declared goal to treat our colleagues, job applicants and business partners fairly, sincerely, and equally.

We welcome diversity – also, and especially, at our company. To us, it is the performance and personality that matters, regardless of personal limitations, age, provenance, gender or sexual identity. All employees working at our company are equal. We commit to providing equal opportunities when supporting the professional growth of our employees and recruiting new colleagues. By signing the Diversity Charter, we have also officially pledged to fulfil the voluntary commitment of further promoting diversity in the working environment.

We expect our employees to follow the governing local laws on equality treatment and non-discrimination as well as the guidelines of our Code of Conduct. Additionally, we ask that our suppliers and service providers also comply with these rules. The tenet of non-discrimination applies specifically when selecting suppliers and when working with service providers.

Example:

Your superior treats employees very differently depending on their ethnic origin. Foreign employees are more likely to be assigned to do unpopular shifts and tasks than their native German colleagues. What do you do?

→ You should immediately inform the relevant contacts. For example, the branch or location management, the People & Culture contact persons in charge or the FIEGE Trust Centre. Our company upholds the principle of equality of treatment for all employees.

1.2
How to treat company property and other assets

We pursue safety and security for the common good! We secure a safe workplace environment for our employees. We also protect our financial interests, tangible assets and non-tangible corporate assets comprehensively against threats and risks. For this, we implement crime prevention measures in line with internationally recognised security standards which serve to protect the infrastructures, processes, information, and commodities of our clients. Our crisis management provides for the continuation of our business activities even in an emergency.

Our company property, be it tangible or non-tangible, is there to support our employees in performing their daily duties. It may be used for legally permissible business purposes only – yet under no circumstances to gain any undue personal advantage.

We expect all employees to treat our company property responsibly. Every one of us is accountable for the proper use and extensive protection of said property. This also applies to the handling of information and know-how. The training offer made available through our FIEGE Academy as well as our Security Managers allows us to ensure that all employees are familiarised with the relevant security requirements and solutions.

The use of company property for personal reasons is only permitted following approval. This applies especially in relation to work performance, resources, buildings as well as the property held with the machine and vehicle fleets. Adequate monitoring is to prevent any form of offences that may damage property.

Example:

You witness how a colleague rams and damages a crossbeam of a high-level rack. The colleague acts as if nothing happened and simply drives off. What do you do?

→ First, you should always try to talk to your colleague in person. Mistakes happen, which is why employees are adequately protected by the law against any personal liability. Therefore, you should immediately report all accidents. If the colleague denies their accountability, you should inform the relevant contacts at FIEGE by all means.

1.3 Sustainability

Responsibility for our employees

We respect the human rights and dignity of our employees and expect our business partners to do likewise. We observe especially the principles of the ILO Declaration on Fundamental Principles and Rights at Work and of the United Nations Global Compact (UNGC).

We expressly oppose all forms of forced labour and child labour as well as modern slavery and human trafficking.

Our employees are free to exercise their freedom of association and right to collective bargaining, giving them freedom to decide, without being coerced or threatened, to join a trade union or employee representation of their choice, or not.

We believe in diversity at the company and are planning to establish the respective KPIs which will transparently and comprehensibly illustrate the status quo.

Responsibility for the protection of the environment and climate

Environmental and climate protection are part of our entrepreneurial responsibility. We continue to work on reducing the impact of our business activities on the environment and the climate. This applies, for example, to our real estate which we optimise with the help of targeted energy management measures in relation to the energy the properties consume and, wherever possible, by covering their energy consumption with renewables.

Our company policy is eco-aware and energy-conscious. Every location is itself responsible for environmental and energy management topics and is centrally supported in their respective implementation by the FIEGE Corporate Sustainability Team whenever needed. The monitoring audits analyse climate-relevant issues.

We continuously sensitise our employees about the responsible handling of resources, and in particular of energy, water, paper and plastic. With our Lean Management approach, we strive to optimise the resource efficiency of our services and reduce waste. Moreover, a principal element of our sustainability strategy is to avoid greenhouse gas emissions. For this, we analyse where emissions are created along our value chain. We will significantly reduce emissions at our logistics centres, in the transport sector and for all further service offerings. Within the context of the Science Based Targets (SBTi) we have pledged to cut our emissions in half in the medium term (by 2030) and to become a Net Zero Organisation by 2050. Net Zero means that, next to reducing emissions, we will also offset unavoidable emissions in the future. It is our vision to hand over the company to the next generation to climate neutral standards.

1.4 Health and safety in the workplace

Safety in the workplace and maintaining and promoting our employees' health are top priorities for us.

We comply with the laws and rules regarding health and safety in the workplace. We are constantly committed to creating a safe, protected, and healthy workplace environment. We strive to analyse the risks of each workplace and reduce them to an absolute minimum.

Routine safety inspections, carried out by in-house and out-of-house safety experts, facilitate the diligent implementation of safety regulations and practices as well as internal guidelines. Just like a risk analysis, our measures are subject to an ongoing review and improvement process. We comply with all legal requirements that concern an ergonomic workplace design and occupational safety as well as the protection and promotion of health.

These guidelines apply not only to all employees, but also to our suppliers. It is our goal to reduce accidents on the job and work-related illnesses and to create a safe and healthy working environment together.

Example:

An administrative clerk at a warehouse facility is wearing neither safety boots nor a high-visibility vest inside the warehouse where forklift trucks are moving around. You notice this. What do you do?

→ It is best if you take up this concern directly with your colleague and point out the respective duties that apply in this particular case. If your colleague refuses to listen, you inform your superior in charge. There are many security rules at the warehouse to prevent accidents on the job. All employees must comply with them.

2.

2.
Compliance with Laws and Practices of Fair Competition

We work in many countries around the world. Our employees are personally responsible for complying with national and local laws and regulations in their respective area of work.

We commit unreservedly to the laws and principles of fair and free competition as a fundamental element of a market economy. Furthermore, we refuse to partake in business transactions with clients, suppliers, and other business partners which are intended to, or even make it possible, to deceive the tax authorities.

2.1 Tax laws

We comply with local and international tax laws. Our employees must ensure that, within their respective area of responsibility and in collaboration with the tax department, applicable taxation laws and regulations are always complied with for everything from the award of contracts through to agreements with clients or expense claims. We oppose any abuse of procedures and aggressive tax optimisation.

Example:

An employee receives a 250-euro gift voucher from a superior as a reward for consistently outstanding work. As the responsible controller, the superior informs you of this matter. What do you do?

→ This is a non-cash benefit for the employee which is subject to taxation and social security contributions. You point this out to your superior and report the gift to the responsible office.

2.2 Fair competition and compliance with national and international provisions

Fair competition and antitrust laws aim to protect free and fair competition. They serve the legitimate interests of all market participants. We protect this purpose unreservedly.

We do not participate in unethical or criminal competitive practices. We refrain from price-fixing and territorial agreements between competitors. Our outstanding position in the market is based on the high quality of our work, our reliability, and our fairness.

Every single one of us must observe the laws and regulations on preventing corruption and money laundering, on customs and foreign trade laws as well as on environmental protection.

When importing and exporting commodities, we observe applicable customs provisions that are in force, and here in particular all reporting requirements that pertain to us. We comply with all restrictions and other procedural and reporting obligations that regard the importation of goods. We are aware of interdictions and approvals that are legally required for the exportation of goods, and comply with them. This applies especially to exports destined for crisis regions and States on which embargoes and sanctions have been placed. Overall, we always comply with applicable sanctions.

Our policy pledges to respect human rights, to act sustainably, to protect our environment and to offer fair working conditions.

This applies specifically to the following regulations:

- Universal Declaration of Human Rights (Resolution 217 A (III)) of 10 December 1948
- ILO Declaration on Fundamental Principles and Rights at Work of 1 June 1998
- United Nations Guiding Principles on Business and Human Rights of June 2014
- The Ten Principles of the UN Global Compact of 25 September 2015
- The United Nations 17 Sustainable Development Goals of 25 September 2015

Example:

A client of ours wishes to send a consignment to a third country. What measures need to be taken in light of customs and foreign trade laws?

→ In a first step, you need to find out who will be handling customs clearance: the client? An outside service provider? Or does this task fall on us? If necessary, export control procedures must be carried out in relation to the commodities, the destination, the purpose and the persons – especially against the background of sanctions that may be in place. If there are questions, be sure to contact our specialised in-house departments or companies (especially FIEGE Customs Services GmbH).

3.

3. Conflicts of Interest

Conflicts of interest create doubt about the quality of business decisions and the very persons making such business decisions. We expect business decisions and actions to not be impaired by personal interests.

We aim to avoid situations where personal financial interests of employees and executives of our company lead to conflicting loyalties.

Your position within the company must not be exploited to one's personal advantage or to the advantage of a close family member or friends and acquaintances.

Business partners must not be favoured out of personal interest.

3.1 Secondary employment

Secondary employment includes all activity for another employer, additional activity at one's own company, and self-employed activity in one's own name or in the name of a third party if such could impair the employee's principal occupation with us or the competitive interests of our company.

Secondary employment of any kind must not impair the obligations of our employees as set out in their contract of employment. Most of all, such secondary employment must not compete with the business activities of our company, nor shall it interfere with social security arrangements, as for example – in Germany – a so-called Mini Job would. Moreover, any secondary employment must not exceed the time limits as set out under applicable laws on working hours and may neither obstruct the recreational purpose of holidays.

For all cases where this is stipulated by the employment contract or other applicable regulations, the responsible competent department must be informed accordingly, and approval must be sought in advance before taking on secondary employment.

Our company welcomes and promotes volunteering and social commitment in organisations and other associations by our employees. However, this must not conflict with the interests of our company or impair the obligations set out in the employee's contract of employment.

3.2 Stakes in competitors, clients, suppliers and other business partners

Any involvement on the part of employees or their immediate family (life partner and minors) in competitors, in clients, suppliers and other business partners must not compete with our company or violate our interests.

Such involvement may encompass, for example, a position with an executive body such as, for example, working on the supervisory board of another enterprise and/or equity investments. Regarding the admissibility of such involvement, approval requirements or other questions in connection therewith, please contact the FIEGE Trust Centre and principal contacts at People & Culture in good time. These rules do not apply to an involvement in the form of shares held in the context of routine personal asset investment.

Example:

You want to buy in as a shareholder in a small transport company that plans to take on orders for clients of one of our locations in the future. You are familiar with the site's transport rates, meaning that you would be able to exploit this useful information. What do you do?

→ Any financial investment of employees in competitors is, on principle, not permitted. Such an engagement tends to violate our company's interests and may lead to conflicting loyalties. Questions in this context should therefore always be coordinated duly with the responsible contact persons at FIEGE in the case of doubt.

3.3 Employment of related persons

Our company sees no reason to prevent the employment of close relatives or related persons of our employees by our company if there is no risk of a conflict of interest.

To avoid conflicts of interest, direct reporting lines between relatives or other related persons must be avoided. Internal transfers will take place as required. Exceptions require consent from the central People & Culture department, the FIEGE Trust Centre or the Executive Board.

Relatives and other related persons of employees are essentially free to work for clients, suppliers, competitors or partners of our company. Any direct business interaction between our employees and relatives or related persons that work for our clients or suppliers, however, is not permitted. The FIEGE Trust Centre or the Executive Board must approve such business, as the individual case may be. In such cases, the employees in question are not permitted to participate in business decisions.

Example:

The life partner of one of our site managers is a sales representative at a facility management service. Contracts are being concluded by and between the companies for some time now. The slightly elevated conditions have gone unnoticed so far. The Site Manager aims to do their partner a favour with the award of profitable contracts, in order to advance their partner's career at the respective company. As the Facility Manager, you notice that a large part of services sourced via this company can be obtained at a lower rate from other service providers. What do you do?

→ Begin by talking to your Site Manager. Mention the better conditions available from other service providers. If the Site Manager fails to respond to these offers without valid reason, you should inform the FIEGE Trust Centre.

4.

4.
Conduct Towards Business Partners, Clients, Suppliers, and Third Parties

It is both our mission and our ambition to always meet the needs and requirements of our business partners and especially of our clients.

We promote fair competition and comply with the provisions of fair competition and antitrust laws. We are an honest and fair partner in our collaboration with our business partners. We win others over with our innovative business, our employees' knowledge, our good service, our dependability, and our fairness.

We always act with integrity in our business relations with our clients, suppliers, and other business partners.

We do not involve ourselves in unethical or criminal business. We and our employees must never directly or indirectly accept or offer bribes.

All employees of our company are prohibited from directly or indirectly requesting, accepting, offering or granting advantages if this could influence business decisions or simply create the impression of such.

There must be no direct or indirect donations or contributions made to political parties, lobbies, election candidates or office bearers on behalf of our company without approval from the Executive Board.

4.1
Relationships with our business partners

We are an honest and fair partner in our collaboration with our business partners. We win others over with our innovative business, our employees' knowledge, our good service, our dependability, and our fairness.

We do not involve ourselves in unfair or criminal business.

We strive to always meet the needs and requirements of our business partners.

Example:

The location where you work has been doing business with a client who stores their excess quantities with you for quite some time. Damage to the roof of the client's own warehouse has resulted in them seeking available storage space for a period of two months to store substances that pose a hazard to water. For you, this business would be perfect to avoid a short-term vacancy. Also, you feel obliged to your client due to your long-standing business relationship. However, your warehouse does not meet the structural requirements and neither do you have an official permit to store hazardous substances. What do you do?

→ Under no circumstances must you offer the vacant space which does not meet the necessary storage requirements to the client. However, you are encouraged to try and locate a warehouse with our company that meets the client's legal requirements. We always comply with the legal stipulations, especially also regarding environmental protection.

4.2
Undue advantage

Aside from their wage, salary or approved additional remunerations, contributions or benefits, our employees must not gain any profit or other advantage from an initiated, executed, ongoing or completed business transaction.

Example:

As the buyer at one of our locations, you are currently negotiating a new, long-term supply contract with an existing supplier. The supplier's negotiating partner makes the following offer at the end of a demanding round of negotiations: "That was an exhausting negotiating session today! You know what? I'll be staying at a very good hotel in the Bavarian Forest over the weekend so I can go hiking. Allow me to invite you and your wife to join me at my expense." What do you do?

→ While the contract negotiations are still ongoing, you must not accept the offer as this may be interpreted as accepting an undue advantage. Therefore, you should politely refrain from accepting the invitation. Even under different circumstances, you should request the approval for your participation from your superior – if unsure, contact the FIEGE Trust Centre. Should the service provider continue to present these types of offers to you and you suspect that they are trying to bribe you, you must inform your superior. Your superior should also involve the FIEGE Trust Centre.

4.3
Contributions

Business relationships are maintained on the grounds of objective criteria only. Neither business partners nor our employees must be influenced by way of gifts, entertainment, or invitations to events. One's business objectivity must never be put into question. To cultivate business relationships, gifts and dinner invitations or invites to an event may be permissible if appropriate according to the respective situation and if they do not breach local laws. As a guideline for the amount, the exemption limits of the national fiscal authorities may be referred to. For example, in Germany these limits are currently 35 euros for gifts and 100 euros for entertainment per person.

Financial contributions in the shape of cash and uncommon privileges and discounts extended to third parties or received from third parties by our employees are prohibited.

Example:

A client extends an exclusive 50% discount on certain electronics to thank the responsible project employee for the smooth and successful conclusion of a project implementation. You and your colleagues wish to take up this discount. What do you do?

→ The situation as described above constitutes a reward from a third party. However, even in a company context, discounts may be extended by third parties that are exempted from taxes for you as the employee. Therefore, you should always clarify in advance whether you are liable to taxation and/or levies. For details, contact your superior or your HR department. Please remember that, as an employee, you are in most cases accountable to ensure accurate taxation.

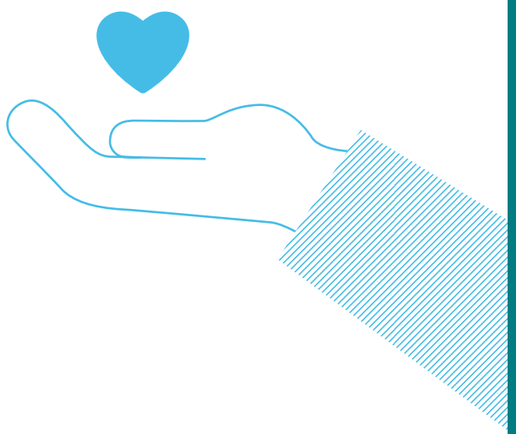
4.4 Donations, sponsorships, and corporate memberships

Donations are made exclusively to non-profit organisations that can demonstrate their non-profit status. Only in exceptional cases and on a very limited scale do we contribute donations in cash and in kind for party-political purposes or to political lobbies. The Josef Fiege Stiftung decides on all types of donations. In either case, donations should be coordinated with the foundation in advance. Sponsorship agreements and memberships call for a separate approval.

Example:

An aspiring sports club would like us to sponsor them. A branch manager wishes to accept the offer because on one hand they would like to support the club and on the other deems this commitment an appealing advertising platform for the company. What must be considered?

→ Because sponsorship is based on the principle of performance and consideration, it is important that a sponsorship contract be concluded in advance. The amount up to which a branch manager may approve a sponsorship is governed separately.



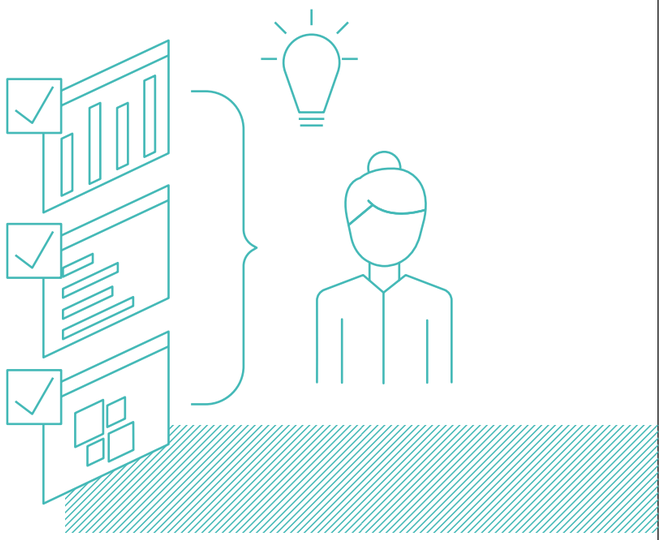
5.

5.
Handling of Information

We protect confidential information against any unauthorised use and disclosure and secure confidentiality through suitable measures taken at all levels. We do not disclose trade secrets. We respect the privacy of our colleagues and business partners. The direct or indirect use of our intellectual property to obtain a personal advantage and to the disadvantage of our company is not permitted, neither during nor after the employment relationship has ended. We recognise our responsibility regarding the company's reputation from our involvement in social media.

We observe the governing laws and regulations when we collect, process, and use the personal data of our employees and business partners. Security of information forms a central part of our corporate strategy and is a top priority for us.

We ensure that our employees act with integrity in their dealings with the authorities. We document our business transactions by way of accurate and transparent reporting.



5.1
Protection of our intellectual property

Intellectual property refers especially to information about business strategies and processes, organisational structures, contracts with business partners, internal performance indicators, employee master data and personal contact information.

Other products of intellectual work, such as business ideas conceptualised while holding a role, are also company property.

Protecting our intellectual property is of key importance for us. Every single one of us must protect confidential information against any unauthorised use and disclosure.

Employees whose roles involve handling confidential information have a special duty to maintain confidentiality, even when dealing with colleagues. When in doubt, the respective contacts and the FIEGE Trust Centre are available to offer advice prior to sharing confidential information with third parties.

The disclosure of confidential information both internally and externally may only be carried out by authorised employees.

Queries from the media, analysts and other persons or organisations that may have an interest in the commercial exploitation of confidential information must be reported to the Executive Board, the responsible management and Corporate Communications.

We consider the unauthorised disclosure of confidential information to the public or to third parties, e.g., competitors, to be a breach of trust which will not be tolerated.

Example:

A client is negotiating the renewal of their contract with us. You are employed in logistics controlling at the location where the transaction is being processed and receive a request from the client's employee. The request is about certain warehousing processes, how many employees are being assigned to the requested processes and what quantities are handled each day. The client's employees state that they have cleared this request with the responsible Key Account Manager. What do you do?

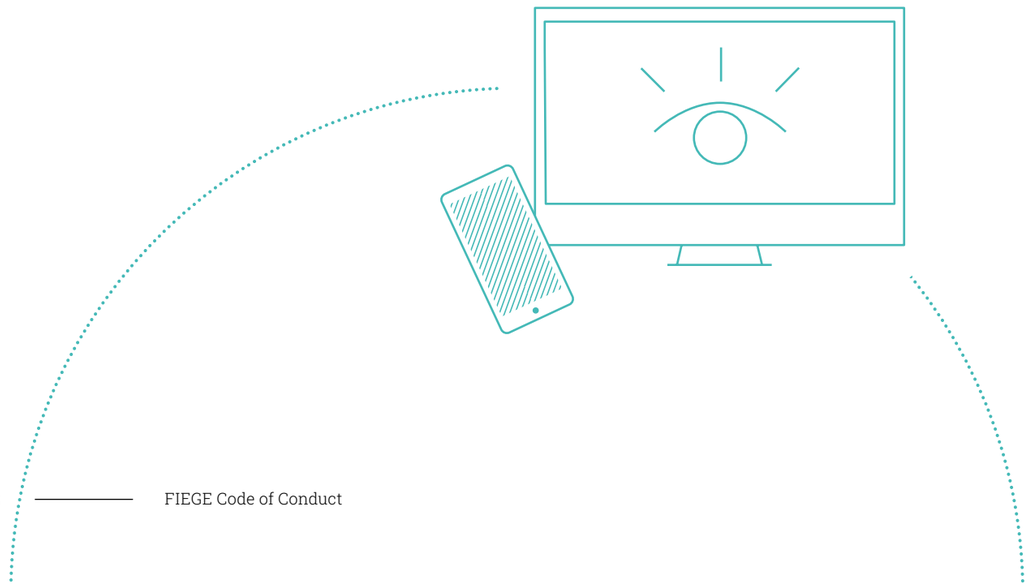
→ First, you should contact the Key Account Manager concerned. Therefore, you ask the client's employees politely for a follow-up to clarify the request internally first. Because in this specific case, the request enquires about sensitive productivity ratios of our company which you are not entitled to disclose without merit, their potential disclosure must first be approved by an authorised person. For this, you should approach the management of your business division first.

5.2
Online etiquette

We are committed to mutual respect and equal treatment, naturally also on the internet. We therefore distance ourselves from radical, racist, sexist or defamatory statements of any kind that may be posted or shared by employees of our company on social media. We will not tolerate the expression or dissemination of vilifying comments, insulting or derogatory language in any form whatsoever.

We therefore ask that you consider the following whenever you are active on social media: information spreads quickly and uncontrollably on social media. Once posted, information is very difficult to completely remove from the web. Every one of us should therefore always carefully review how they wish to be seen on social platforms, and what they share about themselves.

Another important aspect: employees often indicate their role within our company on social media or on social platforms such as LinkedIn, Instagram, Facebook, X (formerly Twitter), Xing or TikTok. When you do this, it must match the role title of your employment contract or current business card. Please be sure to also accurately state any former role titles held with our company.



5.3
Data privacy

The prudent handling of personal data is a top priority for us. The protection of privacy is about so much more than merely complying with the laws – it is about the fundamental values of our corporate activity.

Preserving the right to self-determination and the protection of our employees' privacy, of our business partners as well as all other persons whose personal data we have been entrusted with is therefore paramount in our understanding of the responsible exercise of our corporate duties. This is the only way to form the basis for a trusting and respectful collaboration on all levels.

Every employee is obligated to observe our data privacy principles and is trained accordingly. Moreover, both the Legal department and the Data Protection Officer may be consulted for advice and support at any time.

We will use confidential information that a business partner has entrusted us with for the intended purpose only. We transparently document the use of those data. We expect our business partners to handle our confidential information in the same way.

Example:

Your department wants to create a list with all birthdays of all employees to be able to congratulate them personally and get them a small gift. This list is to be created as a hardcopy. Are you allowed to create the list?

→ To manage a list that contains personal information such as the date of birth, you will require a written declaration of consent from all employees no matter what medium is used to store this information. You will therefore need to obtain the express consent from all colleagues before creating the list. Otherwise, the creation of such a list is not permitted.

5.4 Information security

The security of information forms a central part of our corporate strategy and is a top priority for us. We will only be able to successfully uphold our business processes as a digitalised enterprise if we adequately protect information at the company.

We thus comply with all regulatory and legal requirements and consider information security to be the basis for the future viability of innovative activities. Our clients also expect high standards from us in this regard, which we always fulfil. We have therefore established an Information Security Management System (ISMS) in accordance with ISO 27001 in particularly sensitive areas.

On principle, our approach to maximum information security is based on three pillars: prevent, detect, and respond. Next to Information Security Risk Management and Security Awareness processes, we have built an internal Cyber Defense Center (CDC). The CDC's key field of activity is Security Information Event Management (SIEM) as well as to intercept and protect against cyber attacks.

5.5 Relationship with the authorities

When dealing with the authorities in a business context, we consider it extremely important that our employees act with integrity. Information provided to an authority must be truthful and accurate.

We process official enquiries, such as requests for information, in accordance with the law. If the subject of the enquiry is new or unclear to the person dealing with the enquiry, the Legal department or Labour Relations should be consulted.

Example:

You, an Operations Manager, receive a request from the Trade Supervisory Office, which wants to check the working-time accounts of your colleagues. You pass the request on to the Branch Manager. Is this approach correct?

→ Absolutely! It is never wrong to inform your superior. If ever you are unsure about how to handle enquiries from the authorities or government offices, you may always address People & Culture and Legal at the head office.

5.6 Reporting

As a company operating on an international level, we observe all laws and regulations on reporting both in Germany and in foreign countries.

Complete, precise, and dependable bookkeeping combined with financial and non-financial reporting define our credibility towards the responsible authorities, our clients, and business partners as well as all other stakeholders. Efficient accounting and control systems vouch for this.

Our employees are responsible for ensuring that our reporting presents an accurate, transparent, and complete account of our business activities.

Example:

Because many employees are sick, a branch is incurring high staff costs for the current financial month. The branch management, together with the location's Controlling decide to post a special sale item for this month in the monthly profit and loss account which, although very likely, has not yet been achieved. Is this approach permissible?

→ No. On principle, both sales and expenses must be displayed in the monthly result of such month in which they were incurred. Measures to offset fluctuations in results (smoothing of results) are not permitted. If the service was not rendered within any one accounting period, the sale may only be displayed in the amount to which the service was rendered. The sale must then be displayed in subsequent periods in line with the level of completion. If sales revenues and the corresponding expenses are separate in time, the expenses the sale is expected to incur must be tied to the month in which the sales revenues were generated and posted to the subsequent months in line with the scope of the realised expenses.

6.

6.
How to Implement the Rules of Conduct

The resolute implementation of the rules of conduct constitutes a valuable contribution towards ensuring that we as a company act appropriately in a business environment and when dealing with the public as well as official bodies.

It is the shared responsibility of our employees to achieve this goal.

Our rules of conduct commit all colleagues regardless of national borders and cultures. Every employee must know and internalise the rules.

Our managers bear the special responsibility of role models in this regard.

6.1
Review your decisions and actions

Are your decisions and actions in line with our rules of conduct?

Answering the following questions will provide you with important pointers:

- ☐ **Are my decisions and actions in line with regionally applicable laws and regulations?**
- ☐ **Are my decisions and actions in line with the provisions of fair competition and antitrust laws?**
- ☐ **Am I able to make my decisions for the benefit of FIEGE, free from conflicting loyalties?**
- ☐ **Can I act in the best interest of FIEGE, free from any personal interests of mine?**
- ☐ **Can I easily reconcile my decisions and actions with my own conscience?**
- ☐ **Are my decisions and actions transparent?**
- ☐ **Would my decisions and actions withstand an investigation?**
- ☐ **Do my decisions and actions preserve the reputation of FIEGE?**
- ☐ **Do my decisions and actions protect confidential information and the intellectual property of FIEGE?**
- ☐ **Do I make decisions and act with integrity when working with the authorities?**

If you can answer each of these questions with "yes", your decisions and actions are in line with our rules of conduct.

However, if you are still unsure, please approach your superior or the FIEGE Trust Centre with full confidence.

6.2
Responsible persons

The rules set out in the Code of Conduct aim to enable us to minimise ethical risks at all our units. To achieve this goal, the employees at our company must have access to, and be familiar with, the Code.

We encourage the circulation of and compliance with the Code of Conduct through specific measures.

Our managers have a special role to play here. They must ensure that our employees know, understand, and follow all rules of conduct within their area of responsibility.

We support our employees who express concerns or information in good faith about a failure to comply with the rules of conduct. In good faith means that the employee is convinced of the accuracy of their statement. This expressly applies even if a later investigation should not confirm this statement.

We prohibit any disciplinary measures or sanctions against employees who express their concerns in good faith.

It is crucial that the managers who are greatly responsible for the implementation of the Code have a solid understanding of it. This includes executives, Managing Directors, members of the Management at the business divisions, Branch and Site Managers, and managers at our central divisions. We expect that they will – without exception – set a good example and encourage others to behave in the same manner.

We do not tolerate misconduct or breaches of the rules of conduct set out in the Code.

We follow the principle of proportionality when implementing the necessary measures. We will carefully examine each individual case to establish which consequences are appropriate and necessary.

Exceptions from having to comply with the rules of conduct call for the mandatory approval from a member of the Executive Board of our company. In explicitly designated cases, the FIEGE Trust Centre may also approve such an exception.

Our Executive Board will regularly review the content of the Code and, if and when required, amend this accordingly.

6.3
FIEGE Trust Centre

The FIEGE Group has set up a Trust Centre with principal and local contacts, which is available to all employees.

The FIEGE Trust Centre will provide support in complying with the rules of conduct set out in this Code.

We encourage our employees to contact their superior or the Trust Centre in the event of questions or uncertainties regarding compliant conduct. All queries, questions and concerns associated with the rules of conduct will be taken very seriously. Your issue will always be treated as strictly confidential. It is also possible to submit an anonymous report through our whistleblower platform at **www.fiege.com/compliance.**

The colleagues at the Trust Centre will investigate the issue that you presented based on the rules of conduct set out here and – where necessary – issue a written statement and recommendation.

To further cultivate our open corporate culture, we ask that you provide your name when making a report. Depending on the circumstances, your identity may need to be disclosed to the authorities or courts if the applicable law requires this.

If you are unable to provide your name under these requirements, we will of course also accept reports that are submitted anonymously.

Contact:

trustcentre@fiege.com

Notes

Legal information

The FIEGE Code of Conduct, January 2025

Editor:
FIEGE Logistik Holding Stiftung & Co. KG
Joan-Joseph-Fiege-Strasse 1
48268 Greven, Germany
Telephone: +49 2571 999-0
www.fiege.com

Photos:
FIEGE Logistik Holding Stiftung & Co. KG

The FIEGE Code of Conduct

www.fiege.com

FIEGE