



Code of Conduct

For Employees

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.

General information

Compliance is not an obstacle to business success but it will support TGW LOGISTICS in being successful in its processes and every business relationship. That is why we commit to comply with the present Code of Conduct and Declaration of Principles.

This Code of Conduct is based on TGW's value system and, for the purpose of compliance, standardises the principles of conduct with which all employees of TGW LOGISTICS are expected to comply, independent of their position in the company.

Our principles of conduct

The following principles of conduct ensure long-term corporate success, provide orientation and are a guideline for everyone.

Generally applicable rules for our collaboration

The general rules for our collaboration define how we treat each other, how we work and how we lead. Our compliance management system is only successful if it is based on our value system:

- 📌 We promote open-mindedness, passion as well as proactivity and we expect the employees to assume responsibility and to pursue goals. Individual responsibility and involvement of required colleagues in projects and decision-making processes are expected.



✎ We count on the success that is achieved in the team and set a good example for our colleagues. Mistakes can happen but shall be communicated openly and corrected together with the colleagues. **Value-compliant leadership is part of our compliance culture.**

✎ The collaboration and the personal interaction between the executive management, the managers, team leaders and colleagues are shaped by respect, friendliness, kindness, open-mindedness, honesty and trust.

We treat each other equally and offer an environment in which all of us can find their place and develop themselves. Origin, age, religion, ethnic and cultural differences, sexual orientation and/or identity, gender, illness etc. do not lead to any disadvantage whatsoever and we consider diversity as an obligation and an opportunity. We promote diversity and tolerance since diversity leads to maximum productivity, creativity and economic success.

Any kind of violence and discrimination (e.g. harassment, threats, intimidation, improper pressure, sexual harassment, etc.) is forbidden and will not be tolerated.

Integrity

✎ We will maintain financial, accounting and business records that fully and accurately reflect all the transactions and businesses in which we engage, according to applicable laws, accounting principles, policies and practices such as the valid IFRS standards. **(Standards for invoicing and reporting)**

✎ We are constantly working on improving our products and services. Thus, it is very important to evaluate and adapt the state of our internal processes, products, ideas etc. The professional development of employees is promoted and expected. **(Quality)**

✎ We make decisions exclusively in the best interests of the company. Any conflicts of interest in relation personal matters or other business or non-business activities, including those of relatives or other related parties are handled professionally and transparently. Conflicts shall be handled openly and transparently. **(Conflicts of interest)**

✎ We comply with the law and other internal as well as external regulations, policies and standards. We commit to the principles of fair competition. We do not tolerate or consider corruption, bribery, fraud/deception and cartel agreements as a means to implement projects or to operate successfully.

We refuse to grant or accept any kind of concessions or benefits if they violate the law or are inappropriate or immoral. Gifts are given and received and invitations are extended and accepted only in accordance with our internal guidelines and using our Gift Approval process. Any identified misconduct will be disclosed.

Illegal actions in whatsoever form must not be taken. It is completely irrelevant whether these actions are directed against colleagues, partners, third parties or TGW LOGISTICS (e.g. breach of trust, embezzlement, fraud, wrongful trading etc.). In this context it should be noted that non-disclosure can also be illegal. Expense reports are carried out properly.

We also expect our business partners to act with integrity. We take our responsibility in the value chain very seriously. In this context, we define minimum standards for cooperation in which human rights, respect for the environment, responsibility in and for society, legally compliant and fair treatment of employees and compliance are important criteria. We regularly check compliance with the minimum standards. **(Fair competition, responsibility in the value chain and compliance with the law)**



- ✦ The private use of the company's property (e.g. working services, equipment, operating supplies, auxiliary means, buildings etc.) is not allowed unless otherwise regulated and/or with written approval of the management. Everyone is obliged to use the company's property properly and with care and to report any damages or loss immediately. This also applies to the use of company credit cards, which are to be used exclusively for business purposes (**protection of company property**)
- ✦ In order to protect the success of our company, we are obliged to treat all information as well as business and trade secrets confidentially and to protect them from unauthorised use by third parties. When using and processing confidential information, we ensure compliance with a need-to-know principle and trust in the careful handling of our own secrets as well as secrets revealed to us. (**Protection of intellectual property**)
- ✦ We commit ourselves to handle personal data of natural persons trustfully and carefully. Everyone is obliged to maintain the protection of personal data, to adhere to TGW LOGISTICS' guidelines and to take part in appropriate training courses. (**Data protection**)



Behaviour in society and for society

- ✦ We are committed to environmental protection as well as workplace safety and human rights. Our Declaration of Principles describes our attitude and DNA.

We are a member of the United Nations Global Compact and 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 take into account 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.

Sustainability and assuming responsibility to society are essential in defining our technical, economic and social objectives. Any violation of these principles, in particular of the prohibition of slavery, forced and child labour, will not be tolerated under any circumstances and will lead to appropriate measures.

The protection of the environment, resource-saving use of raw materials, energy efficiency and sustainable innovations play an essential role in all our economic, social and entrepreneurial considerations. (**ESG and corporate social responsibility**)

- ✦ We explicitly respect the right to free speech and the protection of personal rights and privacy. However, everyone should be aware that negative behaviour in private matters might have a negative impact on the company/company group. We are obliged to protect the company's reputation and to refrain from damaging it.

This also includes the use of and communication via social media. Any posts reflect only the personal opinion of the person who posted them. We do not tolerate any employee statements or actions that are racist, contemptuous towards humans or animals, or in any other way discriminatory, especially if these occur in the private sphere and a direct link to TGW LOGISTICS can be established.

Official statements of the company are the responsibility of the management board or explicitly authorised persons (e.g. marketing). That is why TGW LOGISTICS' logo (or other identification features) must not be used without authorisation or prior consent. (**Behaviour in public**)

Orientation

We are expected to behave in accordance with the principles above and check all our actions and non-actions on our own responsibility with regard to the compliance with our principles.

- 📌 Is my action (or non-action) or decision legal?
- 📌 Is my action (or non-action) or decision in adherence to our principles?
- 📌 Is my action (or non-action) or decision free of personally motivated interests?
- 📌 Does my action (or non-action) or decision stand up to public/judicial scrutiny?
- 📌 Does my action (or non-action) or decision protect the reputation of TGW LOGISTICS as a company/company group?

If these questions are answered with „yes“, it can be assumed that the principles of conduct are not violated.

If there are doubts as to the correctness of one's actions or those of others, all employees are obliged to contact their managers, the responsible Compliance Officer and/or the Group Compliance Officer. Managers are obliged to report any reported or identified compliance violations.

Reports are handled according to a standardised process. This builds trust and ensures that everyone is treated equally.

TGW LOGISTICS' whistleblower system „TGW – whistleblowing“ (previously „TGW – integrity line“) is available for reporting any misconduct. Reports can be submitted either anonymously or with contact details. No one has to worry about negative consequences/sanctions when submitting justified reports. On the contrary, whistleblowers contribute to the future success of the company. (whistleblowing)

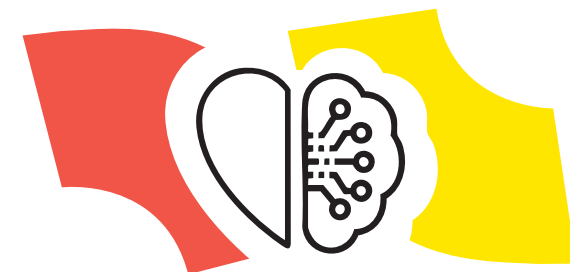
Sanctions

In connection with the violation of our code of conduct we pursue a zero-tolerance policy. This also applies to everyone who is responsible for not disclosing breaches they are aware of. We will take appropriate measures in any case, with no distinction made for hierarchy or function level.

These measures range from work instructions (e.g. trainings), consequences under labour law (e.g. warnings, dismissal) and the adaptation of internal processes to the termination of contractual relationships, the termination of partnerships and reports to the authorities.

Compliance concerns everybody.
We set a good example together.

Compliance at TGW Logistics: with Heart & Mind



CEO Henry Puhl

CFO Sebastian Wolf

CTO Christoph Wolkerstorfer

