



# CODE OF CONDUCT FOR EMPLOYEES

# NOTES ON WORDING

The nouns used in the text, e.g. employee or manager, refer equally to persons of all gender.

The word »employee« also includes managers at all levels.





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# FOREWORD BY THE MANAGING DIRECTOR

**Dear Colleagues,**

as BHS Global Logistics GmbH, we already stand by our customers as a reliable [competence] partner in the field of »logistics«.

We will continuously expand our portfolio – consisting of logistics products and services – in the coming months and years. Because we are »hungry for the future« and live for logistics.

BHS Global Logistics is a young, medium-sized company that acts in an entrepreneurially responsible manner without any ifs & buts. At home in Weiherhammer, our company name already reveals that we will be and partly already are active worldwide. We work with colleagues, customers, suppliers and third parties who come from a variety of countries with different cultures, backgrounds and values.



ALEXANDER WALBERER, MANAGING DIRECTOR

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# FOREWORD BY THE MANAGING DIRECTOR

Certain values are valid all over the world and BHS Global Logistics always wants to continue to grow as a company on the basis of trust, respect, passion, performance, quality and with social responsibility.

We provide our customers with innovative, process-oriented solutions – tailored to their specific needs – without losing sight of sustainability.

The Code of Conduct provides a framework of guidance and applies equally to everyone – Managing Director, managers and each individual employee. It sets a standard for ourselves and at the same time represents a commitment that we will act responsibly both externally in our dealings with business partners and the general public as well as internally in our interactions with colleagues. We bear joint responsibility for our Company's reputation.

Therefore, we ask you to familiarize yourself with our Code of Conduct and use it together with our Corporate Policy as a guideline for our daily business.



*Our basic rules and principles governing our behavior now and in the future have been brought together in this Code of Conduct.*





**01**

**COMPLIANCE &  
CODE OF CONDUCT**

# COMPLIANCE & CODE OF CONDUCT



## What does Compliance mean for für BHS Global Logistics?

By the term »Compliance« we mean that we as employees of BHS Global Logistics adhere to applicable law and internal regulations in all corporate actions to prevent economic damages and such for the Company's reputation. Compliance is the foundation of our corporate decisions and activities. In addition, behavior that complies with the law at all times and everywhere should protect us from personal liability. This requires us to pay special attention to the topics listed in this Code of Conduct (short: CoC), as these involve significant risks in day-to-day life.

## Who takes responsibility for Compliance?

Compliance affects all employees of BHS Corrugated, not just the Managing Director. Everyone is responsible for Compliance in their daily work. Only by knowing, understanding and adhering to the applicable regulations and rules, the sustainable long-term goals of BHS Global Logistics can be achieved.

»CODE OF CONDUCT« / »COC«

# COMPLIANCE & CODE OF CONDUCT



## Who does this Code of Conduct apply to?

This Code of Conduct applies to all employees of BHS Global Logistics. The executives are responsible for ensuring that their employees know their responsibilities and understand this CoC.

## To what extent does the Code of Conduct apply in an international environment?

This Code of Conduct forms the minimum standard for BHS Global Logistics.

The adherence to laws and regulations is an essential basic principle of acting corporate responsible. We always observe the applicable legal prohibitions and obligations. Where national laws are more restrictive than the rules applying at BHS Global Logistics, the national laws prevail.

»CODE OF CONDUCT« / »COC«



# 02

## FAIR WORKING CONDITIONS



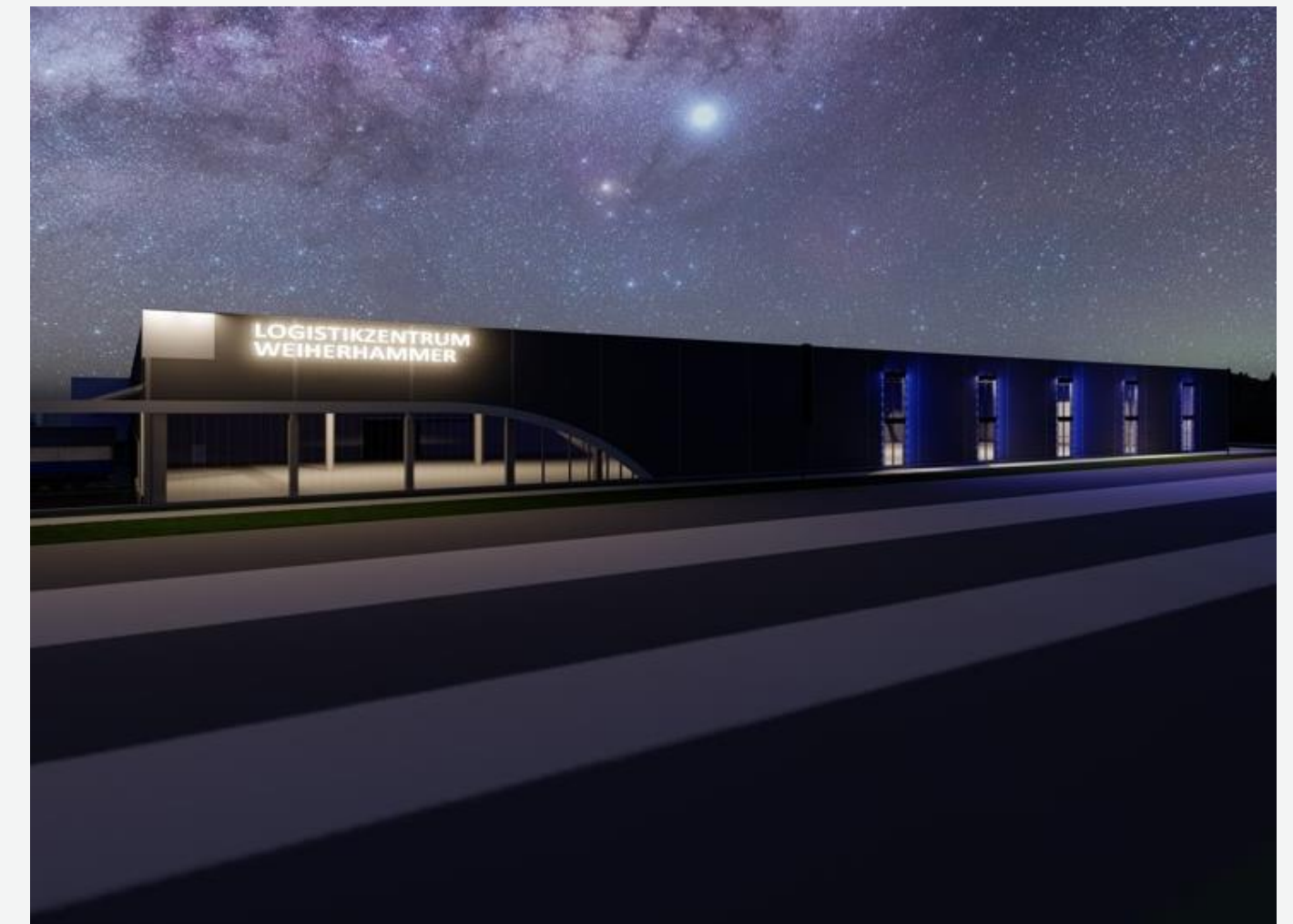
# FAIR WORKING CONDITIONS

## Conducive cooperation at BHS Global Logistics

BHS Global Logistics stands for mutually conducive cooperation and equal opportunities. We respect internationally recognized human rights and support their observance. We strictly reject all forms of forced and child labor. BHS Global Logistics recognizes the right of all employees to establish trade unions and employee representations in the framework of national regulations. The basis for cooperative interaction is an open dialogue characterized by mutual respect.

## Fair remuneration

We stand for a fair and performance-related remuneration as well as employee benefits adapted to our employees' needs. Wages and salaries, including compensation for work overtime and social benefits comply at least with the legal regulations or the relevant applicable collective agreements.



CODE OF CONDUCT

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# FAIR WORKING CONDITIONS

## Work safety and health protection

The safety and health of our employees are, in addition to the quality of our products and our economic success, a high corporate goal. From the planning phase, occupational safety is included in the technical, economic and social considerations.

We also regularly carry out safety instructions, risk assessments and health care. In order to continue to meet these requirements and to optimize processes, all employees are called upon to submit suggestions for improvement. In addition, BHS Global Logistics actively promotes the health of its employees through programs and actions in the context of occupational health management, which is being further expanded. The same safety standards as for BHS Global Logistics employees apply to employees of subcontractors. The safety standards are taken into account in selecting and working with subcontractors.



CODE OF CONDUCT





03

FAIR & FREE  
COMPETITION



# FAIRER & FREIER WETTBEWERB

## Independent economic activities

BHS Global Logistics acts independent on the market. We do not enter into agreements with competitors on prices, conditions, distribution of markets, areas or customers, production strategies, etc. Nor do we agree with competitors on sales territories or target customers.

## Market-conform behavior towards suppliers and customers

The special market position of BHS Global Logistics demands that we deal fairly with suppliers and customers. This means that BHS Global Logistics does not claim e.g. exclusivity or deny a delivery of a customer groundless.

## Only permissible information exchange with competitors

When communicating with competitors, all employees are careful not to disclose any information that could affect future market activities, such as: costs, margins or product developments. All employees should stop the discussions and report the incident to their supervisor, if a competitor fails to comply with the obligation to keep silence, e.g. about margins. This is especially required at association or industry meetings.



CODE OF CONDUCT





# 04

## BUSINESS RELATIONS





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# BUSINESS RELATIONS

## Donations and sponsoring

As a socially responsible company, the BHS Global Logistics can promote social and nonprofit institutions, education, sports and science through donations in cash and kind. All donations must be made in accordance with the applicable legal system. The donations are made transparently and without the expectation of a return. The donation purpose, recipient and receipt must always be documented. All sponsoring activities of BHS Global Logistics must be based on written contracts and must be appropriate to the sponsoring services. Sponsorship must not be used to circumvent the rules on donations.

## Transparent consulting contracts

Agents or consultants appointed by BHS Global Logistics receive appropriate remuneration based on proven services agreed in advance in writing and subsequently actually provided.

## Dealing with public officials

Any undue influence on public officials has not only be avoided by the employees, but also by anyone who works for BHS Global Logistics.



CODE OF CONDUCT

# BUSINESS RELATIONS

## Cross border trade

BHS Global Logistics provides transparent documentation and processing, when importing or exporting goods, services or technical information. Outstanding embargos will be taken into account, as well as necessary permits will be obtained, and legal duties will be paid.



## Prevention of money laundering

BHS Global Logistics fulfills its legal obligations to prevent money laundering in every respect. Every employee is required to avoid and pay attention to unusual financial transactions. This applies in particular to transactions involving cash or via third parties that may give rise to a suspicion of money laundering. Possible suspicions must be reported to the supervisor or the person of trust.



# 05

## CONFLICTS OF INTEREST



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# CONFLICTS OF INTEREST

## Distance between professional and private life

We respect the privacy of our employees and are not interested in personal matters outside the workplace. Our business decisions are made exclusively in the best interests of the Company. Conflicts of interest with personal matters or other economic activities, including those of relatives and other related parties or entities should be avoided right from the start.

Should such conflicts anyway occur, they must be solved in compliance with the law as well as the applicable Corporate policies. The precondition for this is the transparent disclosure of the conflict. In case of possible conflict situations or in cases of doubt, the supervisor or the person of trust must be consulted.







# 06

## TRADE SECRETS & ASSETS

# TRADE SECRETS & ASSETS

## Protection of confidential business information

The Company's intellectual property represents a competitive advantage for BHS Global Logistics and is therefore an asset worth protecting. Everyone at BHS Global Logistics is required to treat business information about BHS Global Logistics and its business partners, which are not publicly known, confidentially and protect them against any unauthorized access by third parties.

## Protection of company property

Everyone is responsible for the protection as well as the appropriate and resource-saving use of the Company's property. Assets may not be removed from the company grounds.

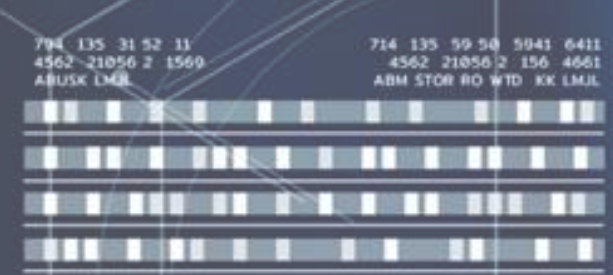


CODE OF CONDUCT



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4562 2992 1556 4661  
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6359 44 98 31 21 875



# 07 DATA PROTECTION & INFORMATION SECURITY

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# DATA PROTECTION & INFORMATION SECURITY

Personal data may only be collected and processed within the permissible legal framework and for clearly defined purposes as well as in compliance with the data subject's rights.

BHS Global Logistics systems and data are always protected against unauthorized access by third parties, e.g. regulated access to personnel files. Everyone is responsible for the proper handling of their access data (e.g. passwords). If additional data protection regulations apply in individual countries, then these regulations prevail.



*The rights of the subject, e.g. the „right to be forgotten“ must be respected.*

CODE OF CONDUCT





**08**

**IMPLEMENTATION &  
CONTACTS**

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# IMPLEMENTATION & CONTACTS

BHS Global Logistics actively promotes the communication of the Corporate policies and agreements, on which the Code of Conduct is based. The organization must ensure that they are implemented and that no employees is disadvantaged by complying with the policies and agreements.

Our managers have a special function as role models. They are the first point of contact for questions on understanding the regulations and must ensure that all employees know and understand the Code of Conduct. As part of their management duties, they prevent unacceptable conduct and take appropriate measures to avoid infringements of rules in their area of responsibility. Good and trusting relations between employees and managers are reflected in honest and open communication as well as mutual support.

With this Code of Conduct, the internal policies and trainings, not all points are addressed and questions are answered. Therefore, every employee has the opportunity and is asked to contact their supervisor, the person of trust, human resources department or the employee representatives at any time with questions.



*If you have further questions regarding Compliance, our person of trust is at your disposal.*

CODE OF CONDUCT





**09**

**REPORTING OF  
INDICATONS OF  
VIOLATIONS**

# REPORTING OF INDICATIONS

If you have suggestions or complaints, in particular violation indications of this Code of Conduct as it pertains to BHS Global Logistics is applicable laws or Group policies, you may report such incidents to the following units or persons (personally, electronically, in writing or by telephone):

- **Manager / Team Leader**
- **Employee Representation**
- **Person of trust**

[compliance@bhs-globallogistics.com](mailto:compliance@bhs-globallogistics.com)



OF VIOLATIONS OF LAWS, GROUP POLICIES OF AGAINST THIS CODE OF CONDUCT



# REPORTING OF INDICATIONS

With each report we help with the clarification and elimination of wrongdoing and grievances. This protects us and the Company against risks or damages.

We would like to point out that the whistleblowing system is only for reporting violations of laws, policies or our Code of Conduct. General complaints are not processed.

Each report will be checked by the person of trust and at each activity the employee representation and the HR manager will be involved in a timely manner.



OF VIOLATIONS OF LAWS, GROUP POLICIES OF AGAINST THIS CODE OF CONDUCT



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