

CODE OF CONDUCT

active forwarding gmbh

We work exclusively on the basis of the German Freight Forwarders' Standard Terms and Conditions 2016 (ADSp 2016).

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Code of Conduct

1. Preamble

The basis of all actions at **active** is compliance with the legally binding regulations at national and international level as well as all obligations entered into voluntarily. All employees and executive bodies of **active** are obliged to inform themselves about the regulations applicable to their area of responsibility in the company, to comply with them and, in cases of doubt, to obtain supplementary information and advice from the bodies responsible for this. The first point of contact should be the respective superior.

active takes special care with regard to human rights and environmental protection in the performance of its services and the associated supply chains. We treat our fellow human beings with respect, uphold human rights and protect our environment. In our business activities, we are always careful not to cause or indirectly contribute to human rights violations or harmful environmental impacts. Human rights and environmental protection have always been important elements of our value-based corporate governance. In our company and in our dealings with our business partners, we attach great importance to mutual respect, trust, tolerance and fairness.

active continually strives to minimise the environmental impact of its operations through a proactive approach and responsible management.

This Code of Conduct applies to all employees and bodies of **active** worldwide. It includes binding principles of conduct that must be observed by all. In this way, we contribute to securing the long-term success of our company. Violations of the Code of Conduct will not be tolerated and will result in disciplinary measures. Violations of applicable legal standards will also result in criminal and liability consequences.

2. Preservation of fair competition

active respects fair and equitable competition. Employees are obliged to comply with the relevant laws regulating competition. In general, the applicable legal provisions prohibit in particular agreements or concerted practices with competitors with regard to prices or conditions, market or customer divisions as well as unfair competitive practices.

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Not only a specific agreement, but also concerted practices and informal discussions that have the object or effect of restricting competition are prohibited.

3. Fighting corruption

active is convinced of the quality of its services and the performance of its employees. **active** resolutely rejects the bribery of business partners with money, valuables or other benefits of monetary value.

Employees are prohibited from demanding, being promised or accepting money or anything of value in return for the purchase of products or other services.

The awarding and acceptance of benefits of any kind is strictly prohibited if they could give the impression of undue influence or even obligation.

This also applies to hospitality and invitations to events that go beyond the usual and legally permitted customs.

Inadmissible contributions may also not be made indirectly via third parties.

The giving and acceptance of customary courtesy and promotional gifts of low value as well as business meals and invitations to events with a direct business connection are permissible within a framework appropriate to the business situation and the position of the parties involved.

However, it must be taken into account that in many countries, gifts and invitations to civil servants, representatives of authorities or other public officials are prohibited by law even if the value is only very small.

active rejects the payment of so-called facilitation payments and follows the recommendations of the International Chamber of Commerce (ICC) in this regard. Facilitation payments are payments of small amounts to representatives of the authorities to speed up official procedures to which one is entitled (e.g. customs clearance). Only if it is absolutely unavoidable (e.g. in emergency situations) is an exception possible in individual cases with the approval of the respective superior in those countries where such payments are permitted. These payments must be documented.

4. Avoidance of conflicts of interest

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active expects its employees and members of its bodies not to engage in any activities or take on any tasks that are contrary to the interests of **active**. Secondary activities for companies of a competitor, a customer, a partner or a supplier as well as financial participations in such companies that exceed the limit of one percent are only permitted with the express written consent of the management. Financial interests (greater than one per cent) of close family members must be reported to the management. Preferential treatment of certain business partners for private interests, in particular preferential treatment of family members, is prohibited. The appearance of preferential treatment for private interests must also be avoided.

5. Compliance with the principles for national and international trade

active complies with all national, multinational and supranational foreign trade regulations. Employees are obliged to comply in particular with the applicable export and import bans, official approval reservations and the applicable customs and tax regulations. Transactions from customers that conflict with these regulations must be rejected. Services by **active** must not be provided if there is any suspicion that they could support such illegal transactions. In this context, particular emphasis must be placed on compliance with the regulations for the prevention of terrorist activities. Special importance is attached to **active's** compliance with national and international regulations to prevent money laundering.

6. Creating and maintaining safe and fair working conditions

active takes responsibility for its employees and strives to create and maintain an attractive working environment for its employees. We respect the right of every employee to form employee representatives and to engage in collective bargaining to regulate working conditions. We regard competitive and performance-based remuneration and compliance with relevant working time regulations as a self-evident obligation. We reject all forms of human trafficking, child labour and forced labour.

active wants to maintain and promote the health of its employees. Therefore, it is the company's goal to ensure a high level of occupational safety at all of **active's** production sites. **active** expects its employees, especially its managers, to be committed to occupational safety at all times.

7. Protection of business assets

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The business success of **active** is based on the innovative strength of its employees and their knowledge acquired over many decades. All employees must therefore ensure that company and business secrets of **active**, but also of its business partners, do not become known outside the company. It is prohibited to disclose company or business secrets without permission, to pass them on to third parties or to use them for one's own purposes without permission.

active expects its employees to handle the company's assets responsibly and to make business decisions on the basis of commercially comprehensible risk-and-benefit analyses. This also includes carefully checking the integrity of **active's** business partners.

active attaches great importance to the integrity of its employees. Depending on the type of business or location and the employee's job, it may be necessary to check the financial situation as well as the personal integrity of the employees.

All documents of **active** - this includes in particular financial reports (external use) as well as accounting records and invoices (internal use) - must reflect the relevant facts correctly and transparently.

Employees are not authorised to use company resources for personal purposes unless their use for personal purposes has been expressly permitted to employees by their employment contract, separate agreement or by their supervisor. In particular, employees are prohibited from using **active's** IT systems to view, save or send pages or messages with legally prohibited or offensive content.

8. Environmental protection

active is committed to using nature's resources sparingly. It is therefore a matter of course that we comply with the applicable legal provisions for the protection of the environment.

We avoid greenhouse gas emissions by using intelligent logistics processes. We contribute to reducing greenhouse gas emissions by using energy-saving cutting-edge technologies. We support science and practice in the development of new technologies and concepts for emission-free logistics.

9. Avoidance of discrimination

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The dignity, privacy and personal rights of each individual shall be respected.

In its dealings with employees and in its cooperation with business partners, **active** is guided by objective and comprehensible criteria. **active** guarantees its employees a working environment in which discrimination and any kind of harassment and disadvantages on the grounds of racial or ethnic origin, gender, religion or belief, disability, age or sexual identity are not tolerated.

active expects its employees to respect different views of life and cultural and country-specific characteristics in their dealings with other employees, including temporary employees or employees employed for training purposes, applicants and former employees, as well as with business partners.

In addition, **active** expects its managers to promote equality between men and women in their professional lives.

10. Dealing with media

Transparent, dialogue-oriented and consistent information of the public - including the media - strengthens the worldwide image of **active**. Official statements, especially to the media, may therefore only be made after consultation with authorised employees.

11. Implementation and organisation

All **active** employees are obliged to behave in accordance with this Code of Conduct. Managers have a special role to play here. They act as role models, are available as contact persons for all questions regarding the principles of conduct and ensure that the employees in their area of responsibility are sufficiently informed about the principles and the other elements of **active**'s values programme.

All **active** employees receive training that is specifically tailored to their area of activity and their requirements.

The Code of Conduct is regularly reviewed and adapted to current requirements (e.g. changes in the law).

If necessary, guidelines will be drawn up on individual principles of this Code of Conduct, which will contain detailed instructions for action and, if necessary, country-specific regulations and will be considered binding.

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