



Code of Conduct

(3. Edition March 2022)

FRIGO-TRANS[®]

Pharma Supply Chain Solutions

Trust, integrity and respect are the basis of our self-image. The Code of Conduct serves us as a guideline for fulfilling our responsibility towards customers, employees, suppliers and all other business partners and thus to create a safe and pleasant safe and pleasant working environment.

The Code of Conduct is binding for all our employees.



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PREFACE

FRIGO-TRANS a European-wide operating corporation that meets the challenges of European competition head-on and assumes entrepreneurial as well as social responsibility. This responsibility includes legal and ethical aspects on the compliance of which we want to base our success as a company. For individual employees who are faced with constant changes, a diversity of tasks, globalization and the growing complexity of the market, it is increasingly important to see that what they do fits into a larger overall context. Company guidelines are therefore of particular importance to our entrepreneurial activities and cooperation.

This Code of Conduct underpins our conviction that we, as a corporation, can only be successful if we base our actions on the following core values:

Trust

- Trust is the basic of our self-understanding.

Create value

- We deliver leading technology and a first-class service to our customers.
- We identify and create added value.
- We provide space for innovations and explore new paths.
- We act with an entrepreneurial spirit.
- We give our employees responsibility and listen to them.

Respect

- We acknowledge our responsibility towards various interest groups, society and the environment.
- We show appreciation and recognition.
- We act with fairness towards our partners and employees.
- We foster an open-minded culture of discussion.

Reliability

- We keep our promises.
- We are committed to technical leadership.
- We want to continue with our success story.
- We act with determination and transparency.

Integrity

- We believe in acting ethically and adhere to our Code of Conduct.

The trust of our business partners, customers, the authorities and the public in particular is a precious commodity that requires lawful and responsible conduct based on integrity. This trust is important for the reputation and success of our corporation. We know that we are not measured by what we say but by how we act.

This applies to every single employee of our group of companies, regardless of the activity performed, position in the company and the associated responsibility.

Fußgönheim, March 20th, 2022



Reiner Roß
CEO



Martin Krasinski
CEO

1. Social Responsibility

1.1 Responsibility for the reputation of the Group

Compliance with valid laws and legal regulations is part of our identity. FRIGO-TRANS complies with the respective applicable laws at local, national as well as international level.

FRIGO-TRANS is aware of its responsibility towards society and undertakes, without exception, all its business activities and social commitments based on that responsibility. This means, first of all, respect for the law as well as the generally acknowledged customs and traditions of the countries where we operate.

FRIGO-TRANS endeavours to ensure that these rules and principles are also complied with by service providers, distributors, consultants, agents and suppliers.

1.2 Responsibility for basic social rights

FRIGO-TRANS respects the internationally recognized human rights and support their compliance.

a) Equal opportunities and non-discrimination

FRIGO-TRANS supports the goals of the Manifesto of the International Labour Organisation. FRIGO-TRANS undertakes, within the framework of the statutory provisions valid from time to time, to respect the principles of equal opportunities concerning the recruitment and promotion of employees. In addition, FRIGO-TRANS respects the rights of employees to equal treatment irrespective of origin and nationality, religion and ideology, gender and sexual orientation, political or trade-union activities, age, illness, disability or other personal characteristics. Discrimination shall not be tolerated within the FRIGO-TRANS Group.

b) Mutual respect

Every FRIGO-TRANS employee must be treated fairly and respectfully. Executives encourage employees through open and intensive communication, transparency and team work. Every FRIGO-TRANS employee shall be respectful and open towards and appreciative of colleagues, undertake to avoid any type of discrimination and foster relationships that are based on fairness. Violence at the work place, threatening behaviour, intimidation, physical attacks and any form of sexual harassment will not be tolerated.

1.3 Leadership and management responsibility

When it comes to compliance with statutory rules and corporate guidelines, our executives must set an example. Responsible management and cooperation require decisions that are transparent and plausible. It is in particular up to our executives to prevent, within their respective field of responsibility, any breaches of laws, internal guidelines and this Code of Conduct that could have been avoided or made much more difficult through appropriate supervision.

Executives must fulfil their organizational and supervisory duties by, in particular,

- Clearly explaining to their employees the concept of compliance with the statutory provisions, this Code of Conduct and internal guidelines and by emphasizing that non-adherence will not be tolerated; and by
- ensuring compliance with statutory rules and internal guidelines.

1.4 Recruiting

As an internationally operating company, we attach great importance to diversity and internationality. We employ people from over 15 nations and different cultures in all divisions of the company. We welcome diverse perspectives and believe that our company is strengthened by a diverse combination of cultures, ethnicity, age, gender, sexual orientation, gender identity or expression, physical or mental abilities, and work-life situations. A transparent recruiting procedure with all candidates is a matter of course for us.

1.5 Sustainability

FRIGO-TRANS is guided by the principles of sustainability and understands these as core elements of good corporate management, in which economic, ecological and social aspects are considered and harmonized.

FRIGO-TRANS always aims to provide logistics services of any kind as energy and environmentally friendly as possible. We think future-oriented in every respect and develop innovative concepts and solutions to meet both challenges. For us, however, sustainable action means much more than that. Because FRIGO-TRANS also secures the future for future generations through economically forward-looking thinking and employee development.

2. Occupational health & safety and environmental protection

In matters of health & safety and environmental protection, FRIGO-TRANS must comply with various national and international rules.

Every FRIGO-TRANS employee should be aware of and comply with the applicable laws, regulations and internal corporate guidelines on occupational health and safety. All employees are called upon, in their own as well as their colleagues' interest, to be constantly vigilant and aware of the potential risks associated with their work and work environment.

Safety at work has the greatest priority for FRIGO-TRANS. We ensure safe working conditions that are in line with applicable regulations governing occupational health and safety. FRIGO-TRANS respect these rules of occupational safety and regularly monitor safety standards to make working conditions safe and avoid health risks. Our employees are informed of the relevant rules and receive instructions on how to comply with them.

Compliance with the laws and regulations that apply to environmental protection is a task and obligation that all of us take very seriously. We therefore take particular care to ensure a responsible use of energy, water as well as basic and raw materials etc.

Sustainable growth that guarantees the protection of the environment, a sparing use of its natural resources and respect for the living conditions of future generations has great priority for FRIGO-TRANS.

3. Cooperation with business partners and third parties

3.1 Fair competition

Competition and anti-trust laws ensure fair and genuine competition. In its business transactions FRIGO-TRANS constantly observes and complies with these laws. Every one of our employees is obliged to adhere to the rules of fair competition. In addition, the provisions set out in the anti-trust guideline must be observed.

This means, for example, that no FRIGO-TRANS employee is allowed to enter into an arrangement with competitors that leads to the fixing or coordination of prices, conditions, capacities, the allocation of customers or markets and production programs. This also includes informal talks or jointly agreed ways of conduct that are aimed at or lead to one of the said restrictions of competition. Even agreements with suppliers and distributors may, under certain circumstances, be critical.

In cases where employees are not sure whether a matter falls under the anti-trust guidelines, it is recommended that they contact the Corporate Management or the competent legal department as early as possible.

3.2 Anti-Corruption

FRIGO-TRANS chooses its business partners exclusively based on competitive criteria (such as quality and price of service). The following guidelines must be observed and followed by all employees:

a) Offering and granting benefits

It is not permitted to grant benefits of any kind to business partners and employees of other companies with the aim of obtaining orders or unfair advantages for FRIGO-TRANS. Handing out advertising gifts of little value or inviting people, within reason, to meals or events is permitted as long as the applicable laws and internal corporate guidelines are adhered to and the possibility of influencing a business decision is excluded from the start. Any benefits that go beyond this nominal level must be agreed in advance with the superior or competent Compliance Officer.

b) Demanding and accepting benefits

No FRIGO-TRANS employee is allowed to use his position or function at work to demand, accept, procure or make others promise personal benefits for himself and / or third parties that he would not obtain without this position. Accepting the occasional customary gift of little value or, within reason, invitations to meals or events is permitted as long as the applicable laws and internal corporate guidelines are adhered to and the possibility of influencing a business decision is excluded from the start. Any gifts and other benefits that exceed that limit must, on principle, not be accepted. Taking part in (cultural, sports etc.) events that have exclusively or predominantly a social purpose, shall only be permitted after prior approval by the superior.

c) Benefits for officials

It is strictly forbidden to offer payments, inducements or other benefits in kind as well as invitations to officials, civil servants, politicians and other employees and representatives of public institutions if such actions could put at risk the independence or integrity of these persons.

As an example, the independence and integrity of these public representatives is called into question if payments or other benefits are promised or granted in order to influence a decision or action in favour of FRIGO-TRANS.

3.3 Expectations vis-à-vis business partners

FRIGO-TRANS also expects its business partners to comply with the principles set out in this Code of Conduct. Hence, in order to do business with us, our business partners must – as we do – comply with the following principles:

- Adhering to all applicable laws
- Abstaining from corruption
- Observing the human rights of their employees
- Abstaining from forced labour and child labour
- Assuming responsibility for the health and safety of their employees
- Guaranteeing these values in their own supply chain

4. How to deal with company property

Every FRIGO-TRANS employee is duty-bound to responsibly handle company property. Company property also includes communication equipment as well as intangible values such as know-how and industrial property rights. Any abuse and waste of company resources damages the operational and financial capacity of the company. Only the efficient use of all resources at all levels can secure the long-term success of the company.

The company property of FRIGO-TRANS must be protected against loss, damage and theft. This protection also includes the careful handling of the means of work that FRIGO-TRANS makes available to its employees to enable them to perform their tasks and achieve the corporate goals (e.g. communication equipment, office material, IT, machinery, vehicles).

We expect all FRIGO-TRANS employees to handle these assets responsibly, avoid unnecessary costs, damage and other disadvantages, and refrain from abusing company property.

5. How to responsibly deal with information

5.1 Reporting

We shall take the greatest possible care when it comes to presenting FRIGO-TRANS to the outside world, be it in writing, verbally and electronically, by way of presentations, business documents, audit certificates, or advertising material and speeches. This means that any reporting is carried out promptly, truthfully, completely and in compliance with the applicable rules and standards. This covers in particular, all written documents that are required for financial reporting and for compliance with disclosure obligations.

Negative statements or defamatory comments about the company, business partners, competitors or colleagues do not comply with our communication principles and are not permitted.

The media are particularly important for the presentation of the company to the outside world. The FRIGO-TRANS marketing department is in charge of dealing with the media. Any enquiries made by the media or other persons from outside the company must be passed on to this department or the Managing Board.

5.2 Confidentiality

Every employee is expected to treat confidentially any information about internal matters that they have become privy to or that has otherwise been made known to them while working for the company and to not pass it on without due authorisation.

Confidential information covers in particular strategic, financial and technical information. It may include details regarding the organisation of the company, prices, markets, customers, suppliers, marketing strategies, business and financial plans, figures compiled by the internal reporting unit, formulations, technologies etc.

5.3 Data protection and safety of information

FRIGO-TRANS observes the rights of its employees and the rights of third parties concerning their personal data. The company undertakes the necessary measures to ensure that personal data is only collected, processed or used for specific, clear and lawful purposes and always in strict compliance with the respective applicable privacy laws according to current EU-DSGVO.

When using data FRIGO-TRANS shall ensure that such use is transparent to the parties concerned and that their rights to information and rectification and, where appropriate, to objection or deletion shall be upheld.

FRIGO-TRANS undertakes to ensure that appropriate standards are applied to the secure processing of information in order to guarantee the confidentiality, integrity and verifiability of any information that is worthy of protection, and to prevent unauthorised use.

6. How to deal with the Code of Conduct

The Code of Conduct is binding for all companies (and therefore for every employee) of the FRIGO-TRANS group mentioned afterwards:

- Frigo-Trans GmbH, intern. Spedition

Every FRIGO-TRANS employee has the right to be bound by the rules of the Code of Conduct. The management is responsible for bringing the Code of Conduct to the attention of all its employees and for monitoring compliance with it. Every FRIGO-TRANS employee is required to inform his superior and/or the management or the responsible compliance officer immediately if he has received indications of possible or already occurred violations of the applicable law, this Code of Conduct or the internal guidelines.

The received information will be treated confidentially and with the necessary care. If there are reasonable indications of an infringement, appropriate measures must be taken to clarify the facts. A whistleblower must not suffer any disadvantages because of his or her tip, unless he or she knew or could easily have known that his or her tip was not correct.

The executives of Frigo-Trans GmbH actively encourage the implementation of this Code of Conduct in their area of responsibility and must carry out regular controls with regard to its observance. The Frigo-Trans employees are called upon to adjust their behavior accordingly to this Code of Conduct.

Fußgönheim, March 2022