



CODE OF CONDUCT

The following guidelines serve as the corporate mission statement and define the social responsibility of FRIGO-TRANS towards stakeholders, society, and the environment. Inspired by the ten principles of the United Nations Global Compact and written in accordance with the UN Guiding Principles for Business and Human Rights, the aim is to ensure respectful conduct in business dealings and to consciously uphold the responsibility for applicable environmental, labour, and human rights. The code of conduct is binding for all employees and for all individuals acting on behalf of FRIGO-TRANS. We expect all employees and stakeholders to consider themselves in the overall context of business activities and adhere to the work standards established in the code of conduct.

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Foreword

FRIGO-TRANS is a company that operates across Europe, facing the challenges of growing competition and being aware of its responsibility to all stakeholders and the natural environment. With the goal of continuing our success story, we base our actions not only on legal requirements but also on ethical principles. In this context, we consider trust, integrity, and respect as fundamental foundations of our corporate philosophy. We place great importance on promoting sustainable practices in all areas of our business activities and firmly believe that success and a pleasant working atmosphere can only harmonize when we align ourselves with the following core values:

Trust

Self-responsibility for employees

Generate Values

Space for innovation and new approaches.
Leading technology and best service.

Respect

Mutual appreciation and recognition.
Fair treatment of each other.
Open culture of discussion.

Reliability

We stand by our word.
Long-term business perspective.
Decisive and transparent action.

Integrity

Honesty, sincerity, and ethics.

As a logistics service provider in the pharmaceutical industry, we bear responsibility for ensuring that the storage, transportation, and handling of pharmaceuticals and medical products are carried out in strict compliance with specific temperature and hygiene requirements. Our primary goal is to guarantee the quality and integrity of the products and ensure that this is done throughout the entire supply chain whilst adhering to environmental regulations and human rights. Good Distribution Practice is of paramount importance to us, as it ensures integrity, professionalism, and responsibility in our distribution activities, thereby ensuring the quality and safety of pharmaceuticals throughout the entire distribution process.

The trust of our business partners, customers, authorities, and the public is invaluable to us. We are aware that we are judged by our actions, not our declarations. Therefore, compliance with this code of conduct forms an essential foundation for our working relationships. Violations and non-compliant behaviour will not be tolerated in any way and can have serious consequences for both the company and individuals. Employees, contractors, consultants, and representatives are asked to sign a declaration confirming that they have received, read, and understood the code of conduct and will follow it.

For readability, the simultaneous use of male, female, and diverse forms of language is omitted from this document. Of course, all personal pronouns are respected and apply equally to all genders.

Fußgönheim, August 2023

Frigo-Trans GmbH Management

1. Social responsibility

FRIGO-TRANS is fully aware of its responsibility to society and conducts business activities as well as social engagement without exception, while keeping this responsibility in mind.

1.1 Compliance with laws and regulations

The company complies with applicable laws at the local, national, and international levels. Adhering to laws, regulations, and internal company guidelines for labour, health, data, environmental protection, and information security is not just a task for us but a commitment. Similarly, we respect the generally accepted customs and practices of the countries where we operate.

We will not tolerate any business practices that violate laws, regulations, or provisions. Engagement in illegal activities, including corruption, fraud, money laundering, or other unlawful actions, is strictly prohibited.

Non-compliance with compliance policies and procedures can have direct and severe consequences for both you and FRIGO-TRANS.

1.2 Respect for fundamental social rights

We are committed to a work environment that respects internationally recognized human rights as well as the dignity, rights, and well-being of our employees. FRIGO-TRANS promotes diversity, equality, and inclusion.

a. Equal treatment

Frigo-Trans supports the prohibition of discrimination in employment and profession and respects the rights of all employees to equal treatment. Every Frigo-Trans employee is to be treated fairly and with respect. Discrimination based on gender, race, religion, sexual orientation, disability, or other personal characteristics is unacceptable and will result in legal consequences. Our employees are committed to refraining from any form of derogation or insult, even if it is not directed directly at the affected parties, and to promoting a respectful working environment. Every employee treats their colleagues with respect and openness. Workplace violence, threats, intimidation, physical attacks, and any form of sexual harassment are not tolerated.

We strive to create an open and trusting work environment where concerns and complaints are taken seriously. Ethical violations or inappropriate behaviour can be reported directly to the neutral complaints office in our HR department or anonymously through provided information boxes. All complaints are thoroughly investigated and treated with strict confidentiality. The affected parties are to be protected in every way from retaliation or negative consequences.

b. Working conditions and wellbeing

We commit to creating safe, healthy, and inclusive working conditions that respect the dignity and well-being of our employees. We support fair compensation, reasonable working hours, and the protection of fundamental labour rights in accordance with the International Labour Organization (ILO) Declaration on the Fundamental Principles and Rights at Work.

c. Safety in the workplace

Every employee is responsible for their own safety in the workplace. This is an essential part of our approach and serves not only the individual but also contributes to the safety and integrity of the entire team and our work environment. FRIGO-TRANS regularly reviews safety standards to ensure a safe working environment and minimize health risks. Employees are informed about relevant regulations and receive appropriate training.

We are committed to ensuring that all employees receive adequate protective equipment to perform their duties in a safe environment. The provided protective equipment is to be used properly to reduce exposure to work-related health and safety risks.

Every employee is called upon to remain vigilant to identify potential hazards in their tasks and work environment, both in their own interest and in the interest of their colleagues. If potential hazards or safety risks are identified, they should be reported immediately.

d. Participation in the community

We commit to conducting our business activities in a manner that respects and supports the surrounding communities. We will ensure that our activities have no negative impacts and instead contribute to social development. We support social initiatives and contribute to promoting the well-being of society.

1.3 Human resources management

Within the framework of applicable legal provisions, FRIGO-TRANS commits to upholding the principles of equal opportunity in the hiring and promotion of employees. Our selection process is based on objective criteria and aims to recruit the best talent while promoting an inclusive and non-discriminatory recruitment process.

The implementation of our values requires a constant pursuit of knowledge and improvement. Training is assigned by department and is mandatory. Each employee is obligated to conscientiously apply the acquired knowledge in their daily work. Training is regularly updated to ensure it reflects current legal provisions, industry-specific standards, and best practices.

As an internationally operating company, we value diversity and internationality. Currently, people from over 15 nations and various cultural backgrounds work together in all areas of our company. We welcome different perspectives and firmly believe that diversity in our company, whether related to cultures, ethnic backgrounds, age, gender, sexual orientation, gender identity or expression, physical or mental abilities, and work-life situations, is a source of our strength.

1.4 Sustainability

In our role as a service provider in the transportation and logistics sector, we understand that our actions can have direct impacts on the environment, society, and the economy. Therefore, we are committed to taking our responsibility and making a positive contribution. We firmly embed the principles of sustainability in our corporate management and see them as fundamental building blocks for our actions. More detailed information can be found in our sustainability report.

Our goal is to meet the growing expectations of various stakeholders while pursuing a long-term perspective with innovative approaches and solutions. Increasing energy efficiency is our top priority. Both our vehicles and the refrigeration units of our trailers always comply with the latest developments in vehicle technology. Our trailers switch to electric power when idle, reducing not only CO2 emissions but also minimizing noise pollution. We place clear emphasis on the responsible use of resources, efficient construction of buildings, and a modern vehicle fleet. In the sustainable design of our buildings, we not only focus on energy efficiency but also consider principles of the circular economy and employee well-being.

However, our understanding of sustainable action goes far beyond that. We undergo evaluation by the company EcoVadis to ensure that we appropriately consider the principles of Corporate Social Responsibility in practice. EcoVadis provides both a platform and methodology to assess the ecological, social, and ethical performance of companies in supply chains and awarded our practices the Silver Medal for the second time.

1.5 Leadership responsibility

Compliance with legal regulations and internal corporate policies is the personal responsibility of each employee. Managers play a prominent role by setting the highest ethical standards and guiding the company in the right direction. It is their duty to ensure that there are no violations of laws, internal policies, or this code of conduct within their area of responsibility that could have been prevented or significantly mitigated through appropriate monitoring.

Managers commit to promoting and embodying a culture of integrity, both individually and collectively. They also foster employees through open and structured dialogue, transparency, and teamwork. They fulfil their organizational and supervisory duties, particularly by:

- Promoting an open culture of discussion within the team and also with other departments.
- Making decisions based on facts, information, and ethical considerations.
- Resolving conflicts in a constructive and fair manner.

- Demonstrating integrity and avoiding compromises that could jeopardize the company's reputation.
- Communicating to employees that legal regulations and the existing code of conduct must be adhered to, and violations will not be tolerated.

2. Collaboration with business partners and third parties

FRIGO-TRANS expects all external service providers, as well as consultants and suppliers, to adhere to and support all ethical guidelines arising from this code of conduct. To ensure this, our company has quality assurance and performance evaluation mechanisms in place for external service providers. At regular intervals, we gather company information from all contractually bound service providers to assess their adherence to ethical guidelines and more. By scrutinizing the supply chain for human rights violations or social issues, we avoid collaboration with unethical and unlawful contractual partners.

3. Integrity in business transactions

3.1 Fair competition

Competition and antitrust laws protect fair and uncorrupted competition. FRIGO-TRANS conducts its business with continuous regard for and adherence to these laws. Every employee is obligated to adhere to the rules of fair competition as well as the general antitrust guidelines.

This means, for example, that no FRIGO-TRANS employee may enter into agreements with competitors in which prices, terms, capacities, the allocation of customers, or markets are agreed upon or coordinated. This prohibition also extends to informal discussions or coordinated behaviours aimed at creating any of the mentioned competition restrictions. Agreements with suppliers and dealers can also be problematic under certain circumstances.

In case of uncertainties regarding the relevance of antitrust issues, it is important to contact the management or the law firm appointed by FRIGO-TRANS at an early stage.

3.2 Anti-corruption

FRIGO-TRANS selects its business partners solely based on competitive criteria. Corrupt actions contradict the values and mission of the company and are not tolerated. The following guidelines cover various forms of corruption, including bribery, corruption, favouritism, or abuse of power.

a. Handling of advantages

No employee may use their official position or function to demand, accept, obtain, or be promised personal advantages for themselves and/or others. Offerings of any kind to business partners and employees of other companies in connection with business activities are not allowed. Accepting customary gifts of nominal value and invitations to meals or events within reasonable limits is generally permitted, provided that applicable laws and internal company policies are adhered to, and any potential influence on business decisions is ruled out from the outset. Any form of offerings that go beyond these customary practices requires prior consultation with the supervisor or the relevant compliance officer. This also applies to participation in events (cultural or sporting) that are exclusively or primarily for social purposes.

b. Avoidance of conflicts of interest

A conflict of interest describes a situation in which personal interests may conflict with professional responsibilities. Decisions may then serve one's personal interest primarily, rather than being made objectively and fairly in the best interest of the organization. This can lead to ethical violations and undermine the trust of customers, partners, and the public in the company or institution. Examples of situations that could be considered conflicts of interest include accepting gifts, business relationships with family members/friends, or personal investments in competing companies. Decisions must always be made in the best interest of the company and its customers.

c. Gifts to public officials

Offerings of any kind, as well as invitations to public officials, civil servants, politicians, and other employees and representatives of public institutions, are prohibited to the extent that their independence or integrity could be influenced. The independence and integrity of these representatives of public institutions, for example, are called into question when payments or other benefits are promised or granted to influence a decision or action in favour of FRIGO-TRANS.

4. Handling of company property

Every employee is obligated to use company resources responsibly, including financial resources, technology, and property. Company property also includes communication facilities and intangible assets such as know-how and intellectual property. The misuse and waste of these resources can negatively affect the operational and financial performance of the company.

Confidential information related to company property must be safeguarded. It is important to protect FRIGO-TRANS's company property from loss, damage, and theft. This protection also includes the careful use of tools and equipment provided to FRIGO-TRANS employees to fulfil their tasks and the company's objectives, including communication facilities, office supplies, IT, machinery, and vehicles.

All FRIGO-TRANS employees are expected to handle these assets responsibly to avoid damages, unnecessary costs, and other disadvantages, and not to misuse company property. Only through the efficient use of all resources at all levels can the long-term success of the company be ensured.

5. Handling of information

5.1 Reporting

In any form of external representation of FRIGO-TRANS, whether in written, verbal, or electronic form – be it in presentations, business documents, audit certificates, advertising materials, or speeches – the utmost care is required. Reporting must be timely, truthful, complete, and consistent, especially concerning all written documents necessary for financial reporting and disclosure obligations.

The media plays a central role as amplifiers in the company's external representation. Specifically designated contact persons (Marketing) within FRIGO-TRANS are responsible for dealing with the media. Inquiries from the media or other external individuals should be forwarded to these contact persons or to the company's management. Negative statements or derogatory remarks about the company, business partners, competitors, or colleagues do not align with communication principles and are not permitted.

5.2 Confidentiality obligation

Every FRIGO-TRANS employee is obligated to treat business and operational secrets that have been entrusted to them during their professional activities or have otherwise become known to them as strictly confidential. These pieces of information may only be disclosed to individuals who need them or are authorized to do so. All documents and information related to the internal affairs of the entire FRIGO-TRANS corporate group and not intended for the public must be handled with strict confidentiality. They must not be disclosed to third parties or made accessible to them and should be protected against any unauthorized use.

Confidential information includes, in particular, all strategic, financial, technical, and business data that require secrecy. This includes details about the company's organization, prices, markets, customers, suppliers, marketing strategies, business and financial plans, internal reporting figures, formulations, technologies, and more. The obligation of confidentiality is an integral part of the employment contract and continues to exist even after the termination of the employment relationship.

5.3 Data protection and information security

FRIGO-TRANS respects the rights of its employees and third parties regarding their personal data and takes appropriate protective measures for this information. The company ensures that personal data is only collected, processed, or used in strict accordance with the applicable regulations and only for clear, explicit, and lawful purposes as defined in the current EU General Data Protection Regulation (GDPR).

When using data, the company is committed to ensuring transparency for the individuals concerned and preserving their rights to information, correction, and, if necessary, objection or deletion. Roles and responsibilities of employees in handling personal data are clearly defined.

It is expected that business partners also conduct their companies in accordance with applicable data protection laws. This includes provisions for the protection of privacy and security. Adequate organizational structures are essential to ensure the protection of personal information from loss, destruction, alteration, disclosure, use, or access, whether accidental, unauthorized, or unlawful.

Our company places the highest value on the security and protection of information. We shape our business practices to meet the requirements of the international standard for information security management. This includes the implementation of effective security controls, regular review and updating of our security measures, and training our employees to raise awareness of the importance of information security.

The implementation of ISO 27001 reflects our commitment to ensuring the confidentiality, integrity, and availability of all information under our responsibility. We encourage all employees and business partners to actively participate in this effort and consistently adhere to the established security standards.

6. Management of the code of conduct

The Code of Conduct is binding for all employees as well as for all individuals acting on behalf of FRIGO-TRANS. This applies regardless of the location and the scope of their activities. There is a need for fair and consistent enforcement of this Code of Conduct. It is binding for the companies listed below in the corporate group and therefore for every employee.

- Frigo-Trans GmbH, internationale Spedition

The management is obligated to inform employees about the contents of these guidelines and ensure their adherence. The contents are not only made publicly available but are also conveyed through training at the time of hiring and subsequently on an annual basis. A user-friendly online training platform helps communicate the key statements unambiguously.

Every employee is encouraged to take immediate action upon detecting any indications of possible violations of our Code of Conduct, applicable laws, or internal policies. A whistle-blower should not face any negative consequences as a result of their report, unless they knew or should have known that their report was inaccurate. All incoming information is treated confidentially and with due diligence.

The management of Frigo-Trans GmbH actively promotes the implementation of this Code of Conduct within their respective areas of responsibility and is obligated to conduct regular checks to monitor compliance. Compliance with these ethical principles is an integral part of contracts and agreements with third parties.

Employees are encouraged to align their own behaviour with this Code of Conduct and to implement the principles of the UN Global Compact in their daily work.