

# Code of Conduct

## Code of Conduct of GC Logistics GmbH & Co. KG

### 1. Principles

GC Logistics GmbH & Co. KG is dedicated to running its company in a socially responsible, ecological manner. We expect that compliance with the principles of ecological, social, and ethical conduct is observed by our employees and integrated into the company culture.

**We place this demand and all conduct principles set forth below also on all parties engaged by us.**

### 2. Compliance with laws

We consider compliance with applicable laws and regulations on the national, European, and international level to be a key fundamental principle of economically responsible action. Every employee, irrespective of his or her position in the company, is at all times obligated to comply with the applicable legal prohibitions, obligations, and internal regulations.

If any employee intentionally infringes these principles, he or she should expect that this will have disciplinary consequences, irrespective of potential consequences under civil or criminal law.

### 3. Employees and their rights, safety, and health

The rights of employees are to be respected and strengthened. They include equal opportunity, tolerance, dealing with one another in a dignified, politely honest manner, prevention of any form of discrimination, and respect for personal dignity. The prerequisite is fair pay in compliance with minimum wages and the maximum permissible working time.

Each of our workplaces is free of discrimination on the basis of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation, or ideology.

The safety and health of our employees is to be assured through conscientious company management. It is to ensure a healthy, hazard-free work environment, whereby in addition all of our employees comply with the regulations concerning occupational safety and health protection.

### 4. Child labour

We strictly reject any form of compulsory or child labour, as well as the exploitation of workers. This must also be assured without exception by companies engaged by us.

We operate exclusively in accordance with the Allgemeinen Deutschen Spediteurbedingungen 2017 – ADSp 2017 – (German Freight Forwarders' General Terms and Conditions 2017). **Note:** In clause 23 the ADSp 2017 deviates from the statutory liability limitations in section 431 German Commercial Code (HGB) by limiting the liability for multimodal transportation with the involvement of sea carriage and an unknown damage location to 2 SDR/kg and, for the rest, the customary liability limitation of 8,33 SDR/kg additionally to EUR 1,25 million per damage claim and EUR 2,5 Mio. per damage event, but not less than 2 SDR/kg. The complete ADSp can be provided in printed form, if required. In addition, we work on the basis of the General Terms of Business of the German professional group for heavy goods transport and crane work (AGB-BSK Kran und Transport 2019).

## **5. Environmental protection**

Policies and standards for environmental protection are to be followed at all times and are to be permanently observed, monitored, and improved.

In this regard, we ensure a responsible treatment of resources, such as energy and water, as well as a sustainable use of our buildings and properties.

## **6. Data protection, information security, and confidentiality**

The requirement of confidentiality applies without exception to business secrets and confidential information.

GC Logistics GmbH & Co. KG treats the data of its employees, customers, entrepreneurs, and partners in strict confidence and with the greatest care.

We collect and use the data of customers and entrepreneurs solely in order to be able to reliably process customer orders in accordance with the requirements. These data are collected on the basis of the statutorily required level of data protection. All cooperation partners ensure that the laws concerning data protection and information security and the official regulations are complied with when personal and company information is collected, stored, processed, transmitted, and disclosed.

## **7. Fair competition**

We commit to comply with the standards for fair competition and fair advertising. The applicable antitrust laws are to be applied. For our employees, this means that collusion with customers and competitors concerning prices, capacities, sham bids, or non-competition is strictly impermissible. We expect from our cooperation partners that fair competition is equally assured on their own responsibility.

## **8. Requirement for partners, customers, and contractors**

GC Logistics GmbH & Co. KG considers it to be a matter of course that these rules and measures not only apply to our company but also are likewise practised and observed by all cooperation partners. In the event we identify violations, we will demand and monitor improvement.

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