



Lagermax

GROUP

Code of Conduct



www.lagermax.com

for employees

Together in motion.

Declaration of Principles

The Lagermax Group, an owner-managed family company, has stood for reliability and continuity for over 100 years. With its own branches in 14 European countries, from Central to Eastern Europe, Lagermax provides logistics systems services with a high degree of competence.

As a major Austrian transport and logistics company, we have a comprehensive portfolio of services covering the areas of shipping and logistics, automotive logistics, parcel and express services and container module construction. The company motto, "Together in motion", symbolises our togetherness - with our customers, our partners and our employees.

With strong international partners, an innovative spirit and rigorous quality requirements, Lagermax contributes to environmentally sustainable, reliable and cost-effective service provision along the value chain.

In all of our activities, we observe applicable laws and respect the customs, traditions and social values of the countries in which we operate. Our goal is to provide logistics services economically and with high customer value through personal commitment.

By affirming common guidelines, the Lagermax Group builds a solid foundation that secures long-term success. In particular, we have an obligation to observe human rights and protect the environment.

This Code of Conduct of the Lagermax Group is binding on all business areas, subsidiaries and international sites.

We recognise our social responsibility towards our employees, partners, the environment and society. Our actions are guided by the values of openness, honesty and integrity. We are reliable partners and only make commitments that we can keep.

This Code of Conduct applies to all managers and employees of the Lagermax Group and binds them to observe it. It contains binding rules that aim to help overcome ethical and legal challenges in everyday operations.

The Code of Conduct is based on the principles of the UN Global Compact, the fundamental principles of the ILO's core labour standards and the OECD guiding principles for multinational corporations.

For improved ease of reading, the generic masculine will be used. This term refers both to companies and to persons of all genders.

Laws and Regulations

Employees undertake to observe applicable laws and regulations in all their actions and decisions. Furthermore, additional provisions of the countries in which activities are carried out should be observed. Changes must also be considered in the fulfilment of contracts and framework agreements.

All employees must be treated fairly and equally.

In order to identify improper behaviour in a timely manner and to assess one's own behaviour, the following key questions provide a guide:

- **Am I authorised?**
- **Am I observing the central values of the Lagermax Group?**
- **Have I examined the risks in detail and excluded the risk of reputational damage to the company?**
- **Does my behaviour constitute a good example?**
- **Would my company view my action as proper if it became public?**
- **Are the actions or gifts appropriate and free of the impression of influence or bribery?**

Your action is only in conformity with the Code of Conduct if all these questions were answered positively. In the event of doubt, the planned action must be discussed with a supervisor and a decision made jointly.

Human Rights

Human Rights

Lagermax Group expects that its managers and employees respect human rights and undertakes to punish violations of human rights. It furthermore recognises the UN's Universal Declaration of Human Rights.

Rights of minorities and indigenous peoples are also respected and protected. Lagermax Group is committed to not carrying out forced evictions or unlawful deprivation of land, forest and water areas.

Lagermax Group does not hire or use private or public security forces to protect business projects if this could affect human rights.

Forced Labour

We reject all forms of forced and bonded labour, slavery as well as human trafficking and undertake to sanction any violations. All employees have the possibility to select their form of employment without compulsion.

Child Labour

The Lagermax Group observes the United Nations regulations on human and children's rights and undertakes to only employ people above the legal working age. Child labour is rejected and is not tolerated.

Discrimination

We condemn all forms of discrimination. All employees are treated equally regardless of their skin colour, disability, religion, political views, social origins, work hours model or gender. All employees must be treated with respect regardless of their position in the company.

We expect equal treatment of women and of diverse genders to be promoted. Supporting people with disabilities is also very important to us. Diversity, equality and inclusion are important values at the Lagermax Group and must be respected by all managers and employees.

We expect dignified, respectful behaviour by all employees towards their fellow humans. Sexual harassment, physical or verbal abuse, coercion or maltreatment are strictly prohibited.

As part of an ethical recruitment process, there is no discrimination in the selection of new employees. Violations of the prohibition on discrimination will be sanctioned.

Labour Standards

Health and Safety

The Lagermax Group ensures health and safety in the workplace and supports its employees in further developing and improving the work environment. Managers promote health and safety in the workplace.

Labour Unions

We respect the rights of employees, unions and representative bodies. Integration of representative bodies in collective bargaining is enabled. To this end, the Lagermax Group can provide information to the labour representatives to aid in their decision-making. Furthermore, the right to freedom of association is observed.

Fair Work Conditions

Work hours, conditions and remuneration are defined on the basis of laws, regulations and collective agreements. Observance and implementation are the responsibility of the management.

Business Secrets

We expect managers and employees to guard the business secrets of the Lagermax Group and of its business partners. Confidential information and documents may never be disclosed to third parties or made accessible to them without authorisation. Violations will be strictly sanctioned.

Data Protection

Managers and employees must protect the privacy of others in the company and of business partners. The Lagermax Group expects its employees to be able to recognise sensitive data and protect it from disclosure. Private data may not be requested or stored by employees or business partners. Personal data may only be collected, processed or used to the extent necessary for defined, clear and legal purposes. Every single employee must observe the regulations and laws regarding data protection and confidentiality.

Personal data such as pictures may not be published without written consent and mention of the source. Data related to the Lagermax Group may only be published with the approval of the Communications Department.

Communication

External and internal reports and documents must always reflect the truth and be correct. Applicable standards can be used for orientation.

Company-related communication with the public or the media must in each case be cleared with the Head of Communications and the Board of the Lagermax Group. Independent communication without approval is forbidden in order to ensure a uniform image of the company.

Internal communication must be transparent. Our aim is to encourage active exchanges and regular coordination within the team.

With regard to behaviour on social media, we ask our employees to be polite, honest and transparent. Discriminatory, hurtful or racist publications are not tolerated. The publication of internal data relating to the Lagermax Group or its partners is strictly prohibited.

Company Property

Property of the Lagermax Group may exclusively be used for business activities. This includes facilities and office equipment as well as warehouses, workshops, production sites, mobile devices, computers, software, tools and machines. Exceptions must be cleared individually with the management. All employees are obligated to handle the provided work materials with care.

The Lagermax Group shows respect for intellectual property. In this context, plagiarisms must neither be acquired nor used.

Environmental Protection

The Lagermax Group has undertaken to protect the environment and acts within laws and regulations. Managers and employees are expected to handle resources with care and to continuously work towards reducing environmental impacts.

Negative environmental impacts must constantly be avoided and reduced. The Lagermax Group expects managers and employees to apply this principle in their departments.

A central issue is the avoidance and reduction of waste, greenhouse gases and air and noise pollution. We also expect our business partners to give priority to renewable energy sources and pay attention to energy efficiency. We also value the responsible use of resources like water or chemicals. In addition, we attach great importance to the reuse and recycling of materials.

In addition to measures to diminish environmental impacts, we welcome a commitment to protect the environment and to protect biodiversity. All legal regulations on environmental and animal protection are fulfilled.

The Lagermax Group is working on the gradual decarbonisation of business activities and relies on the support of all employees.

Anti-corruption

Corruption

The Lagermax Group does not tolerate corruption or other unfair commercial practices by managers or employees. Corporate interests and the private interests of employees must always be strictly separated. All actions and decisions must be free of personal interests or the interests of third parties. Personal benefits such as gifts or non-cash benefits that aim at, or might aim at, inciting favouritism are prohibited. Managers and employees may neither offer nor accept such benefits.

Gifts and invitations that fall within common commercial practices of hospitality, customs and manners are not prohibited as long as they are of a low value. Insignificant occasional gifts from business partners may be accepted if they do not exceed a value of € 50, or € 100 for invitations. This is conditional on all actions or gifts being appropriate and free of the appearance of influence or bribery.

Conflicts of Interest

Should personal interests oppose the interests of the Lagermax Group, there is a conflict of interest. In this case, managers and employees must report these conflicts. If for example a business partner is related to a Lagermax Group employee in a related decision-making role, the Lagermax Group employee must recuse himself from that decision-making process.

Professional activities outside the Lagermax Group may also result in conflicts of interest. This could include membership in an external body, which must receive prior approval from the management. We support employees' engagement in public functions, associations or other charitable organisations, provided that the activities do not oppose the interests of the Lagermax Group.

Running a company that competes, even partially, with the Lagermax Group is prohibited to managers and employees. A direct or indirect participation in a non-listed company that competes, even partially, with the Lagermax Group is also prohibited. Prior written consent is required for participation in a company that is a business partner of the Lagermax Group. The approval is delivered by the management and stored in the personnel file. However, the approval will not be granted, or can be revoked, should the employee's work relate to said company. A participation of close relatives in a competing company or another company described above must be reported to Human Resources in writing by the employee, if he is aware of it, and is documented in the personnel file.

Antitrust

The Lagermax Group observes fair competition and adheres to applicable laws that protect and promote competition. This includes antitrust laws and other competition laws. In this context, agreements with competitors and other activities that could influence prices and terms are strictly prohibited.

Money-laundering

Money-laundering is prohibited for managers and employees. Furthermore, contact with persons suspected of money-laundering should be avoided.

Donations and Sponsorships

The Lagermax Group donates money and materials for educational, cultural, sports and social issues. The donation must be free of hidden interests and must always be transparent and well-documented. Donations to religious communities, political parties or private persons are not permitted.

Export controls and economic sanctions

In the context of business activities, import and export controls as well as economic sanctions are complied with and embargoes are not breached.

Contact and Information

This Code of Conduct provides you with a framework to verify that actions conform to the law and to the corporate culture. Violations can be reported through the whistle-blower system. Indications of violations can also be reported anonymously through this system. We do not tolerate sanctions or disciplinary measures against employees who report violations of this Code of Conduct.

Misbehaviour may have severe consequences for the affected person and the entire company. In the event of a violation, all participants can expect sanctions.

Questions regarding the Code of Conduct can be addressed to compliance@lagermax.com.