

Code of Conduct



www.lagermax.com

for business partners

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 provision of services 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 collaboration. In particular, we have an obligation to observe human rights and protect the environment.

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 summarises the Lagermax Group's expectations of its business partners. We expect our business partners to observe existing laws as well as the ethical principles laid out in this Code of Conduct. In addition, the business partner must define, implement and ensure binding requirements for suppliers along the supply chain (including Tier 1 suppliers).

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

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

Human Rights

Human Rights

Respect for internationally recognised human rights forms the basis of all business relations of the Lagermax Group. Our business partners undertake to respect human rights and to punish violations of human rights.

Rights of minorities and indigenous peoples must also be recognised and protected. Our business partners commit to not carrying out forced evictions or unlawful seizures of land, forests or water. Nor must private or public security forces be used to protect business projects if this could affect human rights.

Forced Labour

We reject all forms of forced and bonded labour as well as human trafficking and obligate our business partners to sanction any violations. All employees should have the possibility to select their form of employment without compulsion.

Child Labour

The business partners of the Lagermax Group observe the United Nations regulations on human and children's rights and undertake to only employ people above the legal working age. Child labour must be strictly rejected.

Discrimination

We condemn all forms of discrimination. All employees of our business partners must be 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 also be respected by all our business partners.

We expect the employees of our business partners to behave with dignity and respect towards their fellow humans. Sexual harassment, physical or verbal abuse, coercion or maltreatment are strictly prohibited.

As part of an ethical recruitment process, there should be no discrimination in the selection of new employees.

Labour Standards

Health and Safety

The business partners of the Lagermax Group ensure health and safety in the workplace and support their employees in further developing and improving the work environment. Managers must promote health and safety in the workplace.

Labour Unions

Our business partners respect the rights of employees, unions and representative bodies. Integration of representative bodies in collective bargaining must also be enabled. To this end, information must be provided to the labour representatives to aid in their decision-making. Furthermore, the right to freedom of association must be observed.

Fair Work Conditions

To ensure that our business partners provide fair work conditions to their employees, fair work hours, conditions and remuneration should be defined on the basis of laws, regulations and collective agreements.

Business Secrets

We expect our business partners to guard the business secrets of the Lagermax Group. 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

The Lagermax Group expects its business partners to be able to recognise sensitive data and protect it from disclosure. Personal data may only be collected, processed or used to the extent necessary for defined, clear and legal purposes. Every business partner must observe the regulations and laws regarding data protection and confidentiality. Data related to the Lagermax Group may only be published with the approval of the Communications Department.

Business partners shall keep correct accounts and ensure the accuracy of records when financially responsible.

Intellectual property and plagiarism

Lagermax Group business partners must show 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 expects its business partners to also act within laws and regulations. Resources should be handled with care, and continuous efforts should be made towards reducing environmental impacts. We encourage our business partners to implement an environmental management system such as ISO 14001 or EMAS.

Negative environmental impacts should also constantly be avoided and reduced. The Lagermax Group expects its business partners 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 further expect our business partners to prioritise the use of renewable energy and to focus on energy efficiency. The Lagermax Group also values the responsible use of resources like water or chemicals. In addition, value is set on the reuse and recycling of materials.

In addition to measures to diminish environmental impacts, the Lagermax Group welcomes a commitment by its business partners to protect the environment and to protect biodiversity. The preservation of soil quality and animal diversity is a matter of course for us. In this context, business partners should work on a gradual decarbonisation of business activities.

In addition, all legal regulations on environmental and animal protection must be fulfilled.

Anti-corruption

Corruption

The Lagermax Group does not tolerate corruption or other unfair commercial practices by its business partners.

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. Such benefits may neither be offered nor accepted.

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

The business partners of the Lagermax Group must make their decisions on the basis of factual criteria and may not allow themselves to be influenced by financial or personal criteria. Conflicts of interest must be avoided in all cases.

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 the Lagermax Group and for its business partners. Furthermore, contact with persons suspected of money-laundering should be avoided.

Export controls and economic sanctions

In the course of business activities, business partners must take into account import and export controls as well as economic sanctions and embargoes.

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.