

Code of Conduct for the Conceptum Logistics Group

The Conceptum Logistics Group is committed to the principle that economic success and proper ethical behavior in business are inseparable objectives of our corporation.

With these expectations in mind, this Group Code of Conduct is aimed at providing us with common guidelines for our daily collaborations and transactions. It summarizes our commitment to ethical conduct and the fundamental legal requirements.

The Code also reflects our corporate values: We have a passion for people - both customers and our team - as well as for complex logistics projects, we strive for top performance, trust and respect characterize our way of acting with each other.

We are aware of our responsibility towards our customers, partners, employees, and the organizations we work with. We expect our business partners to act in accordance with the same ethical principles as we do.

Fairness and Respect

The Conceptum Logistics Group is represented globally by a worldwide network of offices. Our success depends upon excellence of our services, our people and the trust our business partners and third parties have in us. It is based on the cooperation with individuals of various ethnic backgrounds, cultures, religions, ages, disabilities, genders and convictions, to name just a few of the characteristics that make each human being special.

We expect everyone to respect these characteristics and to refrain from any kind of discriminatory behavior. We do not tolerate discrimination or harassment or any other offensive behavior whether sexual or otherwise personal, nor do we tolerate false and malicious statements or similar actions that may cause harm to our employees, customers or business partners.

Understanding the needs of our customers, our suppliers and service providers is the key for stable cooperation. Fairness and respect are likewise essential for the Conceptum Logistics Group's relationship with its business partners. Therefore, they should be treated in a manner consistent with the principles contained in this Group Code of Conduct. Accordingly, Conceptum Logistics Group provides complete and accurate information to its business partners and, of course, refrains from making false or misleading statements.

Antitrust and Fair Competition

Conceptum Logistics Group acknowledges that open competition is an elementary component of the free-market system as it promotes efficiency, economic development and innovation. Therefore, we strive to comply with the relevant legal parameters, first and foremost antitrust laws. Antitrust laws are rules of competition that apply to restrictive agreements and business practices and prohibit the improper exploitation of a dominant market position. Accordingly, Conceptum Logistics Group supports fair business transaction practices. We do not tolerate in price fixing or illegal attempts to coordinate market influence among competitors.

Anti-Corruption and Improper Advantages

Everyone at the Conceptum Logistics Group is expected to avoid participation in or benefiting from any kind of corruption or bribery, be it active corruption concerning the offering and granting of improper advantages or passive corruption concerning the accepting of improper advantages. All employees have to comply with international anti-corruption standards as laid down in the United Nations Global Compact and local anti-corruption and bribery laws.

This also applies to our business partners. In particular, they are not allowed to offer Conceptum Logistics employees any benefits, gifts or advantages that influence the personal conduct of employees with regard to their work for the company.

Anti-Money Laundering

Conceptum Logistics Group does not condone or facilitate money laundering. Money laundering is the process of disguising the nature and source of money connected with criminal activity (such as terrorism, drug dealing or bribery) by integrating dirty money originating from criminal activities into the system of commerce so that it appears legitimate or that its true source or owner cannot be identified.

Trade Control Regulations / Sanctions and Embargos

For the Conceptum Logistics Group as a company with international business the compliance with applicable trade control regulations is crucial. Trade control regulations can apply, for instance, to the transfer of goods and services across certain national borders. They may be triggered in connection with direct or indirect exports to or imports from certain countries or parties which are subject to sanctions based on national or international security grounds.

Avoiding Conflicts of Interest and Segregation of Duties

The Conceptum Logistics Group trusts that personal interests of its executives, managers and employees do not conflict with the interests of the company. Everyone is expected to avoid conflicts of interest or even the appearance of such conflicts when conducting professional activities. We expect that personal and other relationships that may create a conflict of interest will be disclosed to our management.

In order to make all our transactions transparent and ensure due control, we follow the four-eye principle. Therefore, all legally relevant declarations to third parties in the name of Conceptum Logistics must generally be made by two representatives of the Conceptum Logistics Group.

Data Protection and Data Security

The advantages of electronic communication and access to intranet and internet entail certain risks in terms of privacy protection and data security. A proactive view of these risks requires that personal data must always be stored securely and with appropriate precautions. Therefore, the collection of personal data is only permitted

to the extent that is necessary for a predetermined, clear and legitimate purpose. In some jurisdictions, like the European Union strict laws and regulations apply with the respect to the collection of personal data from others, such as customers or business partners in place. Everyone at the Conceptum Logistics Group must comply with applicable data privacy and data security laws.

Confidential Information

Everyone at the Conceptum Logistics Group possessing confidential information must guard it in accordance with legal and contractual requirements. Such information may not be shown, reviewed or discussed in public or in the presence of third parties. Furthermore, confidentiality must be maintained even after a contract relationship with the Conceptum Logistics Group has ended.

Health and Safety

The health and well-being of Conceptum Logistics' employees is paramount. We strive to keep our operations safe by taking appropriate measures to prevent accidents. We appeal to everyone to pay attention to health and safety issues in the workplace.

We also expect our business partners to strive to maintain a high level of health and safety in the workplace. Business partners must comply with applicable health and safety laws and ensure a safe and healthy work environment to maintain employee health and prevent accidents, injuries and work-related illnesses.

Environment

Conceptum Logistics Group considers the protection of the environment and the conservation of natural resources a high priority. We strive to conduct our business in a manner that is safe for the environment as far as controllable by us. Everyone at the Conceptum Logistics Group is expected to give his support in achieving these goals while remaining sensitive to the environmental impacts of the day-to-day business and otherwise complying with the applicable environmental laws.

Our business partners shall also comply with all applicable environmental laws, regulations and standards and operate an efficient system for identifying and eliminating potential environmental hazards.

Whom to contact

If anyone has discovered a case of possible violation of the law or any of the ethical principles contained in this Group Code of Conduct reporting is possible via Email (compliance@conceptum-logistics.com) and/or directly to the appropriate supervisor.

Conceptum Logistics Group

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