

### **Code of Conduct**

# Compliance with legal regulations and other stipulations at home and abroad

In all its business related decisions and actions BRIEM Speditions-GmbH strives to comply with applicable regulations and other significant provisions at home and abroad. Integrity and honesty stimulate fair competition, also with regard to our clients and suppliers.

# Commitment of management

BRIEM Speditions-GmbH considers it its duty to combine its actions with economic, social and environmental awareness. By observing applicable laws regarding the prohibition of cartels, competition and the Act against Restraints of Competition, BRIEM Speditions- GmbH makes every effort to operate in a competent and ethic manner, protecting the idea of fair competition in all markets the company does business in. Unfair benefits granted to clients, suppliers or competitors are to be avoided.

#### Conflict of interests

BRIEM Speditions- GmbH expects its employees to show loyalty towards the company and to avoid any situations that may lead them into conflict with their personal or financial interests. Staff are therefore not allowed to take a financial share in competitors, suppliers or clients, or to engage with them privately in any business relations inasmuch as this could lead to a conflict of interest. Conflicting situations must not adversely affect the interests of BRIEM Speditions-GmbH. Conflicts of interest may arise in a variety of situations. As an example, no employee may accept any benefits of any kind which, upon reasonable doubt, might influence business decisions or transactions of BRIEM Speditions-GmbH. Invitations must be within the bounds of normal business hospitality. Employees are not allowed to get personal access to confidential information nor to gain direct or indirect benefits for themselves or the company on the basis of their position within BRIEM Speditions-GmbH. It is the duty of all members of staff to support the legitimate interests of BRIEM Spedition-GmbH as best as possible. Competitive situations with the company are to be avoided. Every real or possible conflict of interest must be reported and discussed with the head of staff concerned.

## **Prohibition of corruption**

BRIEM Speditions-GmbH is against corruption and bribery. No courses of action including transactions with improper means will be tolerated. Employees of BRIEM Speditions-GmbH may neither offer any perks to corporate business partners nor accept perks from them which might lead to an impairment of objective and fair business decisions, or may even give reason to such impression.

## Handling internal knowledge

All employees of BRIEM Speditions-GmbH shall undertake to ensure a fast and smooth exchange of information within the company. Information must be passed on properly and completely to the sections concerned unless, in exceptions and especially in the case of obligation to secrecy, corporate priority interests prevail. Relevant knowledge may neither be unrightfully withheld, falsified or passed on selectively. Dishonest reporting within the company, to non-affiliated organisations or to third persons is strictly forbidden. All annual financial statements and annual reports, business documents and records of BRIEM Speditions-GmbH must not only accurately represent any business transactions but also comply with legal requirements as well as accounting principles and internal accounting procedures of BRIEM Speditions-GmbH.

# Dealing with assets

All members of staff at BRIEM Speditions-GmbH are responsible for the proper and careful use of the company's property. Every employee shall undertake to protect the property of BRIEM Speditions-GmbH against loss, damage, misuse, theft, embezzlement or destruction. It is the duty of ever staff member to advise their superior without delay of any use of assets that is contrary to the above provision.

# Confidentiality and data protection

With a large part of BRIEM Speditions- GmbH business information being confidential or legally protected, confidentiality is a duty. This shall not apply, however, if a publication of BRIEM Speditions-GmbH information has been approved or is mandatory due to legal regulations or stipulations. The obligation to maintain secrecy shall apply in particular to intellectual property. This includes business secrets, patents, brands and copyrights, business and marketing plans, drafts, business documents, remuneration data and all other undisclosed financial data and reports. BRIEM Speditions-GmbH will make careful and confidential use of all and any personal information concerning employees, clients, business partners and suppliers as well as other third parties, while fully observing data protection laws. Protection of such information must be executed with the greatest care.