

THE FIEGE CODE OF CONDUCT



Shared principles for responsible and lawful conduct
within the FIEGE Group



"If we manage to integrate morals and ethics into our business processes, we will be successful."

Daniel Goeudevert

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All references to persons refer to both sexes, even if the masculine form is chosen for better readability.



Jens Fiege and Felix Fiege, Executive Board of the FIEGE Group

FOREWORD

Responsibility, respect and trust

Dear colleagues,

There are many reasons why our company is successful. One key reason is our responsible and fair conduct towards our colleagues in the workplace, our business partners, and the general public.

Maintaining and enhancing the excellent reputation of the FIEGE Group is of central importance to us.

Markets and cultures are moving closer together. New laws and regulations are placing considerable demands on day-to-day work. The expectations that our business partners and the public have of us are growing.

This Code of Conduct is intended to help you navigate your way through an increasingly complex world. The rules of conduct formulated within it form a shared guide for responsible conduct both in professional life and away from it.

The Code sets out the rules that you must abide by in order to comply with laws and regulations.

It also describes the FIEGE Group's system of values, which determines the way we deal with colleagues, our customers and suppliers, competitors, authorities and the public on a daily basis. It is important that each of us knows and consistently follows the rules of conduct applicable to our activities.

Failure to observe these has the potential to cause considerable damage throughout the FIEGE Group.

We ask that you continue to secure the success of our company by acting responsibly in line with the Code of Conduct.



Jens Fiege



Felix Fiege

THE IMPORTANCE OF THE CODE OF CONDUCT

The importance of the Code of Conduct for the company and for each and every one of us

The FIEGE Group's Code of Conduct is a guide to legally and ethically appropriate conduct in the workplace. It describes the most important legal conditions and ethical standards.

The Code also describes the expectations that our business partners and other stakeholders have of us. Last but not least, the Code describes our company's system of values.

The rules set out in the Code represent a guide for the conduct of employees, managers and members of the Executive Board alike.

The Code also serves as a point of reference, offering all employees security in their day-to-day work.

We as a company, and all individuals, are responsible for ensuring that the relevant rules set out in the Code are adhered to.

We demand observance of the principles of this Code of Conduct when working with our business partners, particularly our customers and suppliers.

We have set up a central advisory office in order to ensure compliance with the rules of conduct. This office will offer assistance with all queries, questions and concerns associated with implementation of the rules.





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1.0 FUNDAMENTAL RULES OF CONDUCT

What matters

Every employee of the FIEGE Group or business partner is entitled to respect, politeness and fair treatment.

We will not tolerate anyone being put at a disadvantage on the basis of ethnic origin, disability, age, gender, religious beliefs or sexual identity.

Discrimination or harassment of any kind shall not be tolerated at any site of the FIEGE Group.

The company property – whether in material or non-material form – is there to support our employees in performing their tasks. We must protect it from damage, loss or misuse.

Safety in the workplace and maintenance and promotion of our employees' health represent core aspects of our work.

1.1 DEALING WITH ONE ANOTHER

The FIEGE Group is an internationally active company. We work with people of different nationalities, cultures and races. This is something that we are proud of.

We support the fundamental principles of the United Nations Charter of Human Rights.

We respect the dignity, privacy, views and personal rights of every colleague, applicant and business partner.

We do not tolerate discrimination based on skin colour, gender, sexual orientation, religion, age, disability, nationality, or social or ethnic origin.

Harassment or abuse of colleagues, applicants or business partners will not be tolerated at any site of the FIEGE Group.

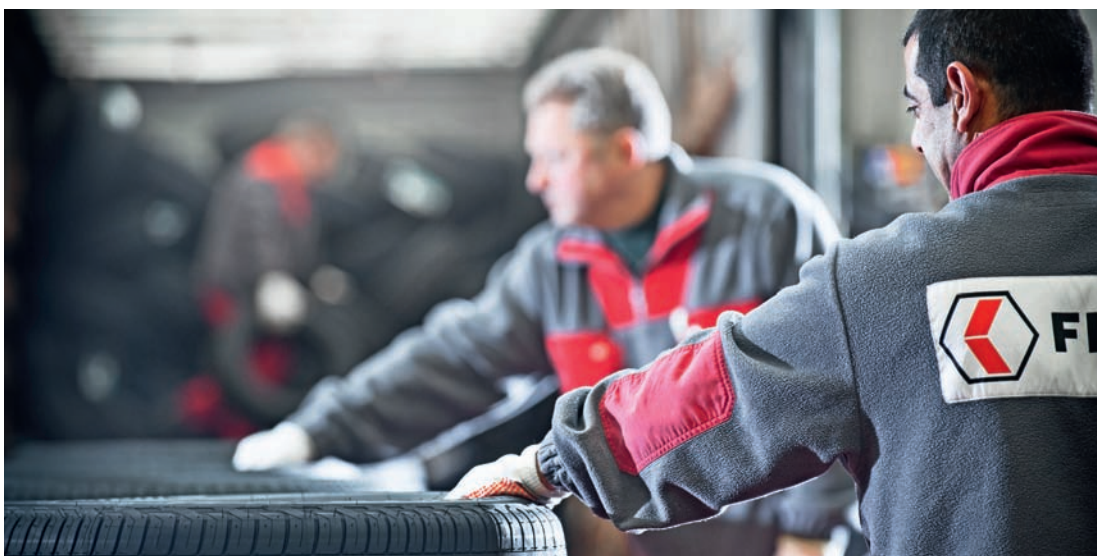
We are reliable partners. We keep our promises.



CASE STUDY 1.1

An employee is being discriminated against and bullied by another employee because he is homosexual. The employee is always making jokes about him and trying to turn other colleagues against him. You become aware of this. What do you do?

Discrimination of any kind is not tolerated at the FIEGE Group. All employees are obligated to refrain from putting people at a disadvantage or harassing them because of their sexual identity. You should discuss the matter openly with your superior or the advisory office.



1.2 EQUAL TREATMENT

Our stated aim is to treat our colleagues, applicants and business partners fairly, sincerely and equally.

Women and men are treated equally within the FIEGE Group.

We are committed to equality of opportunity when promoting colleagues and hiring new staff.

We expect every employee of the FIEGE Group to follow the locally applicable laws and regulations on equal treatment and discrimination.

The FIEGE Group demands compliance with the content of this Code of Conduct by its suppliers and service providers as well. In particular, the principle of non-discrimination must be complied with when selecting suppliers and when working with suppliers and service providers.



CASE STUDY 1.2

Your superior treats employees very differently depending on their ethnic origin. Foreign employees have to do more unpopular shifts and tasks than their domestic colleagues.

How do you behave?

You should inform your branch/division manager or works council immediately. The FIEGE Group upholds the principle of equal treatment of all employees.



1.3 DEALING WITH COMPANY PROPERTY AND OTHER ASSETS

The company property – whether in material or non-material form – is there to support our employees in performing their tasks. It must only be used for legally permissible business purposes, and never to obtain personal advantages.

Supervisors and employees must also handle the company's intellectual property responsibly.

Each of us is responsible for proper use and protection of company property.

Private use of company property is only permitted with authorisation.

This particularly applies to private use of labour services, resources, buildings and goods in the machine pool and vehicle fleet.

Appropriate monitoring measures aim to prevent any offences that would cause damage to assets.



1. CASE STUDY 1.3

You witness a colleague driving into the cross bar of a high-bay shelf and damage it. The employee does not let on and simply continues driving. How do you behave?

First you should try to speak to the colleague. Mistakes can happen. Employees have protection against personal liability for such mistakes in the laws and courts. As such, the colleague should report the incident. Should he fail to do so, you must inform your superior.

1.4 HEALTH AND SAFETY IN THE WORKPLACE

Safety in the workplace and maintenance and promotion of our employees' health are top priorities for us.

We comply with the laws and regulations on health and safety in the workplace. We are constantly committed to creating and enhancing a safe, protected and healthy working environment.

Regular safety assessments by internal and external safety experts ensure implementation of safety provisions and practices and internal guidelines.



CASE STUDY 1.4

An administrative employee at a storage site is not wearing any safety boots or a safety vest in a warehouse that has forklift trucks moving around. You notice this. What do you do?

The best thing to do is to speak to the colleague directly and inform him of his obligations. Should he refuse to act, inform the responsible operative manager. There are numerous safety regulations in place in warehouses in order to prevent workplace accidents. These must be observed by all employees.







2.0 COMPLIANCE WITH LAWS AND PRACTICES OF FAIR COMPETITION

What matters

The FIEGE Group works in many countries around the world. All employees, colleagues and supervisors are personally responsible for compliance with national and local laws and regulations in their area of responsibility and in the countries in which we work.

We commit unreservedly to the laws and principles of fair and free competition as elementary components of a market economy.

We fulfil our tax obligations. We expect the same from our business partners, without exception. We will not tolerate deception of the tax authorities.

2.1 TAXATION LAW

The FIEGE Group meets its tax obligations. The company ensures that it is in harmony with laws on fiscal regulations. We reject any form of misrepresentation or aggressive tax optimisation.

Employees, colleagues and supervisors are obligated to comply with national and international taxation laws and meet their documentary obligations within their area of responsibility.

When introducing or optimising services, we ensure that the taxation requirements are met.

We refuse to work with customers, suppliers or other business partners on anything that is intended to, or makes it possible to, deceive tax authorities.



CASE STUDY 2.1

A valued employee is given a 250-euro gift card by his superior as a reward for his constantly outstanding work. You, as the responsible controller, are informed of this by the employee's superior. How do you behave?

This is a non-cash benefit for the employee, which must always be taxed and on which social security contributions must be paid. You must inform your superior and report the gift to the responsible office. The FIEGE Group is fully committed to meeting all tax obligations.



2.2 FAIR COMPETITION AND COMPLIANCE WITH NATIONAL AND INTERNATIONAL PROVISIONS

Competition and antitrust laws aim to protect free and fair competition. They are there to serve the legitimate interests of our customers and consumers. The FIEGE Group supports this aim unreservedly.

We do not participate in unethical or criminal competitive practices. We refrain from price and territorial agreements between competitors. Our outstanding position on the market is based on the high quality of our work, our reliability and our fairness.

Each and every one of us must observe the laws and regulations on preventing corruption and money laundering, on customs and foreign trade, and on environmental protection.

Compliance with the rules on the minimum age for employment set out by the International Labour Organization (Convention 138) is a top priority for us.



CASE STUDY 2.2

A customer of the FIEGE Group wants to send a consignment to a third country. What measures need to be taken, in light of customs and foreign trade laws?

Is customs clearance for export being carried out by the customer, by an external service provider or by FIEGE?

The following must also be checked:

- *goods-related export control*
- *destination-related export control*
- *usage-related export control*
- *person-related export control*

The specialist internal firms (FIEGE Customs Services GmbH and FIEGE International Freight Forwarding) will be happy to answer any questions.





3.0 CONFLICTS OF INTEREST

What matters

Conflicts of interest create doubt about the quality of business decisions and about the person making such business decisions. We expect business decisions and actions to not be impaired by personal interests.

We want to avoid situations in which private financial interests of employees and executives of the FIEGE Group lead to conflicting loyalties.

A person's position within the company must not be exploited to their own benefit, to the benefit of a close family member or to the benefit of friends.

Business partners must not be favoured out of personal interests.

3.1 ADDITIONAL EMPLOYMENT

Additional employment includes all activity for another employer, additional activity within the company itself, and independent activity on the employee's own behalf or on behalf of a third party, if such could impair the employee's main work within the FIEGE Group or FIEGE's competitive interests.

Additional employment of any kind must not impair the obligations of any employees of the FIEGE Group as set out in their contract of employment.

Before additional employment is commenced, the responsible HR department must be notified, and consent obtained. Consent shall be granted in accordance with the legal provisions.

Our company welcomes and promotes voluntary activity and social involvement by its employees in clubs and other associations. However, this must not conflict with the interests of the FIEGE Group or hinder the obligations set out in the employee's contract of employment.



CASE STUDY 3.1

In order to top up his income, a lorry driver of the FIEGE Group does transport jobs for another company early in the morning. The employee often turns up to work late and tired. You find out about this additional employment from a colleague. How do you behave?

First you should attempt to talk to the colleague and inform him of his obligation to report this employment. Should he fail to do so, you should inform your superior.

Paid additional employment must always be reported to and approved by the employer.



3.2 SIGNIFICANT INVOLVEMENT IN COMPETITORS, CUSTOMERS, SUPPLIERS AND OTHER BUSINESS PARTNERS

Significant involvement by an employee or a close family member (partner or dependent child) in competitors, customers, suppliers or other business partners must not compete with the FIEGE Group or violate its interests.

Significant involvement may include office holding and/or equity participation.

OFFICE HOLDING

We do not tolerate employees of the FIEGE Group holding offices with a competitor. Such involvement may lead to a direct conflict of interest. In the event of doubt, it shall be down to the Executive Board to specify who is a competitor.

Holding an office with customers, suppliers or other business partners of the FIEGE Group requires the consent of the Executive Board. The consent of the shareholders is required for members of the Executive Board.

EQUITY PARTICIPATION

Employees are not permitted to hold equity, either directly or indirectly, in a non-listed company that is in full or partial competition with the FIEGE Group.

In addition, the same rules as apply to commencement of additional employment apply to equity participation in companies of any kind.

Employees must inform the advisory office and the central HR administration of any involvement of close relatives (e.g. spouse, child, parent or partner) in a competitor company as soon as they become aware of such. The notification shall be documented in the employee's personnel file.

The rules exclude involvement in the form of shares as part of a standard private investment.



1. CASE STUDY 3.2 OFFICES HELD WITHIN OTHER COMPANIES

You, a business unit leader, have received a request from a former employer. They want you to join their supervisory board. What do you do?

You cannot become an office holder (e.g. supervisory board) within another company without the consent of the Executive Board. This position may lead to conflicts of interest. In addition, this is paid additional employment, which would require prior consent from the employer in any case.



2. CASE STUDY 3.2 FINANCIAL INVOLVEMENT IN OTHER COMPANIES

You want to buy in as a shareholder in a small transport company that plans to take on orders for customers of a FIEGE branch in future. You are familiar with the site's transport prices, meaning that you would be able to use this useful information. How do you behave?

Financial involvement of employees in competitors is essentially not permitted. Such involvement generally contradicts the interests of the FIEGE Group and leads to conflicting loyalties.



3.3 EMPLOYMENT OF FAMILY AND FRIENDS

There is nothing to prevent employment of close relatives or friends of FIEGE employees within our company, unless there is a risk of conflicts of interest.

In order to avoid conflicts of interest of any kind, direct reporting lines between relatives and friends must be avoided. Internal transfers will take place as required. Exceptions require consent from the advisory office or Executive Board.

Family and friends of employees are essentially free to work for customers, suppliers, competitors or partners of the FIEGE Group.

Direct business interaction between employees of the FIEGE Group and relatives or friends that work for our customers or suppliers is generally not permitted. The advisory office or Executive Board must approve such business on an individual basis.

In such cases, the employee in question is not permitted to participate in business decisions.



CASE STUDY 3.3

The partner of a FIEGE division manager is a member of the sales staff at a company that provides facility management services. There have been contracts concluded between the two companies for a long time. The slightly elevated conditions have not been noticed before. The division manager wants to do his partner a favour and improve her career opportunities with the lucrative orders.

You are the facility manager and notice that the majority of services purchased through this company could be obtained more cheaply from other service providers. What do you do?

Begin by speaking to the division manager and informing him of the better conditions offered by other service providers. If, after several attempts, he fails to look into these offers without valid reason, you should inform the advisory office.





4.0 CONDUCT TOWARDS BUSINESS PARTNERS, CUSTOMERS, SUPPLIERS AND THIRD PARTIES

What matters

The FIEGE Group supports fair competition and complies with the provisions of competition and antitrust laws.

We act with integrity in our business relations with customers, suppliers and other business partners.

Employees of the FIEGE Group must never directly or indirectly accept or offer bribes.

All employees of our company are forbidden from directly or indirectly requesting, accepting, offering or granting benefits if this could influence business decisions in an inadmissible way, or give the impression of such.

There must be no direct or indirect donations or contributions made to political parties, lobbies, election candidates or office bearers on behalf of the FIEGE Group without the consent of the Executive Board.

4.1 RELATIONSHIPS WITH OUR BUSINESS PARTNERS

The FIEGE Group is an honest and fair partner when working with its business partners. We win others over with our innovative services, our employees' knowledge, our good service, our reliability and our fairness.

We do not involve ourselves in unfair or criminal business.

We strive to meet the needs and requirements of our business partners.



CASE STUDY 4.1

For a long time, your FIEGE branch has been in a business relationship with a customer that stores his excess quantities with you. Due to damage to the roof in his own warehouse, the customer is now looking for two months' worth of storage space for water-polluting substances in class WGK 3 (heavily water-polluting). For you, this business would be perfect for avoiding a short-term vacancy. In addition, you feel beholden to the customer due to the long-standing business relationship.

However, your warehouse does not meet the structural requirements and you do not have official permission to store hazardous substances. How do you behave?

Under no circumstances may you give the vacant space to the customer. However, you could try to find a compliant warehouse for the customer within the FIEGE Group.

The FIEGE Group always complies with legal stipulations regarding environmental protection.



4.2 ACCEPTANCE OF UNDUE ADVANTAGES

Aside from your wage, salary or approved additional remunerations, contributions or benefits, employees of the FIEGE Group shall not gain any profit or other

advantage from an initiated, implemented, ongoing or completed transaction.



CASE STUDY 4.2

As purchaser for a FIEGE branch, you are currently negotiating a new, long-term delivery contract with an existing supplier. The supplier's sales employee offers you the following at the end of a difficult round of negotiations: "That was an exhausting negotiating session today! You know what? I'm going to be staying at a gorgeous hotel in the Bavarian Forest at the weekend so I can go hiking. Why don't you and your wife come? I'll pay."
How do you behave?

In the situation of an ongoing contractual negotiation, you are not allowed to accept the offer. Accepting this invitation would be seen as accepting an undue advantage. Even under different circumstances, you should have participation approved by your superior, or contact the advisory office if in doubt. In the case outlined above, you should politely decline the invitation. Should the service provider continue to behave in this manner and cause you to suspect that they are trying to bribe you, you must inform your superior. Your superior should also involve the advisory office.

4.3 CONTRIBUTIONS FROM THIRD PARTIES

Employees of the FIEGE Group shall only accept gifts, favours, hospitality or other contributions from a person or organisation that does business with our company, is seeking to do business with our company, or is a competitor of our company under certain conditions.

Gifts, favours, hospitality and other contributions may only be accepted if they

- do not exceed the boundaries of normal business practice,
- are not of a disproportionately high value and cannot be viewed or understood as bribery,
- do not violate the applicable laws and ethical principles,
- will not cause embarrassment to our company or the employee if they become known to the public.

Rewards from third parties, e.g. in the form of purchasing discounts, require active involvement from the employer. The employee must disclose such procedures to the company in order to facilitate checking of any tax obligation. Employees should speak to their superiors so that they can agree the next steps with the specialist department.

These rules particularly apply when working with suppliers.

Participation in business lunches and entertainment events of third parties must take place with the necessary restraint. It should merely serve the purpose of initiating and improving business relations. In such cases, the participant should ensure that the events are being taxed by the inviting party in accordance with § 37 b EStG (German income tax act). If this is not the case, taxation must be agreed and clarified with the specialist department at FIEGE.

In the event of doubt, the advisory office should be consulted for advice.

Attempts by third parties to bribe employees of the FIEGE Group must be reported to the advisory office immediately.



CASE STUDY 4.3

A customer grants project employees at FIEGE an exclusive discount of 50% on certain electronics as a thank you for smooth and successful conclusion of an implementation project. You and your colleagues want to take advantage of the discount. How do you, the employee, behave?

This is a reward from a third party. However, even in a company context, there can be offers of discounts from third parties that are tax free for you as an employee. Therefore, you, as the employee, should always clarify in advance whether you will be obligated to pay any tax or contributions.

You can contact your superior or your HR department. Please remember that, as an employee, you are usually responsible for correct taxation.

4.4 CONTRIBUTIONS TO THIRD PARTIES

Employees of the FIEGE group shall not offer cash gifts, benefits that may be exchanged for money or other contributions to employees of customers, suppliers, competitors or other business partners.

Contributions to third parties are only permitted if:

- they clearly and exclusively serve the purposes of planning, concluding and/or implementing business transactions.
- they remain within the scope of general business practices and are of low value. Company gifts should be appropriate for the occasion and person. The limit for deduction-free business expenses is currently 35 euros net per recipient and financial year. This should serve as a guide.

- the granting of such does not violate a law, national or regional ordinances or general ethical principles.

Gifts and other contributions of any kind to civil servants or employees in public service are not permitted.

In the event of doubt, the advisory office should be consulted for advice.



CASE STUDY 4.4

A branch gives a long-standing customer a gift worth around 1,500 euros for Christmas. Is that OK?

No. Gifts should generally be understood as a gesture of recognition. Valuable gifts can quickly be perceived as an attempt at bribery by the customer, and should therefore be avoided. Many customers are also unable to accept valuable gifts. If uncertain, please contact your superior or the advisory office.

4.5 CONTRIBUTIONS TO PARTIES, POLITICIANS OR LOBBIES

The FIEGE Group will only make financial donations and donations in kind for political purposes or to political lobbies in exceptional circumstances and to a very limited extent. The Executive Board shall make decisions on donations of this nature.

There must also be no contributions of any kind made to persons or organisations that could have a negative impact on the reputation of the FIEGE Group.

In the event of doubt, the advisory office must always be consulted.



CASE STUDY 4.3

There is an election on for the town council and a branch manager – as a representative of and on behalf of the FIEGE Group – donates 2,500 euros to the party of a candidate with whom he is friends. Can he do this?

No. Donations are very seldom made to parties, politicians or lobbies – and only with express consent from the Executive Board of the FIEGE Group.



4.6 DONATIONS, SPONSORSHIP AND CORPORATE MEMBERSHIPS

Requests for donations, sponsorship or corporate membership should be handled especially sensitively. It must be thoroughly ensured that this is not a hidden attempt at bribery, or an attempt to serve the personal interests of the FIEGE employee initiating the measure or of a person related to or friends with such employee.

In order to guarantee this, all donation and sponsorship activities must be subject to the "4-eyes principle", regardless of the amount.

Further rules of conduct regarding donations, sponsorship and corporate memberships are set out in a separate instruction.



CASE STUDY 4.6

An aspiring sports club would like the FIEGE Group to sponsor it. A branch manager wants to accept the offer because he would like to support the association and because he sees it as an attractive advertising platform for the company.

How should he proceed?

Because sponsorship is based on the principle of service and counter-service, it is important that a sponsorship contract be concluded in advance. The amount up to which a branch manager may approve sponsorship is governed separately.





5.0

DEALING WITH INFORMATION

What matters

Direct or indirect use of our intellectual property for personal benefit and to the disadvantage of the FIEGE Group is not permitted either during or after the employment relationship.

We protect confidential information from unauthorised use and disclosure.

We are conscious of our responsibility for the company's reputation in our involvement in social media. We do not publish business secrets. We respect the privacy of our colleagues and business partners.

We observe the applicable laws and regulations when we collect, process and use personal data of our employees and business partners.

We ensure that our employees act with integrity when dealing with authorities.

We document our business in accurate and transparent reporting.

5.1 PROTECTION OF OUR INTELLECTUAL PROPERTY

Intellectual property particularly refers to information about business strategies and processes, organisational structures, contracts with business partners, internal performance indicators, employee master data and personal contact information.

Products of intellectual work, such as business ideas arising within a role, also belong to the company.

Protecting our intellectual property is of key importance for us. Each of us must protect confidential information against unauthorised use and disclosure.

Employees whose roles involve handling confidential information have a special duty to maintain confidentiality, including when dealing with colleagues. If in doubt, they must seek advice from their superior or the advisory office before passing confidential information on to third parties.

Internal and external disclosure of confidential information may only be carried out by authorised employees.

Queries from the media, analysts and other persons or organisations that may have an interest in commercial exploitation of confidential information must be passed on to a member of the Executive Board, the management, corporate communications or the authorised spokesperson.

We see unauthorised disclosure of confidential information to the public or to third parties, e.g. competitors, as a breach of trust, which will not be tolerated.

The obligation to protect our intellectual property continues to apply after the end of the employment relationship.



1. CASE STUDY 5.1

A friend that works for a competitor of the FIEGE Group asks you for the latest company figures. You work in controlling and know the current results. However, you only give your friend the company figures that have already been published on the website. Did you behave correctly?

Yes. Only pass on the figures that have already been published by FIEGE. Under no circumstances may you give out unpublished figures. Unauthorised disclosure of company figures can be damaging to FIEGE. If in doubt, always contact your superior or the advisory office.

Further case studies to 5.1 on page 34



2. CASE STUDY 5.1

A customer is in negotiations with FIEGE regarding a contract extension. As part of this, an employee in logistics controlling at a FIEGE branch where the customer transaction is being processed receives a request from an employee of the customer.

He would like to know how certain warehousing processes work, how many employees are being set aside for the requested processes and what quantities will be handled each day. The customer's employee says that he has cleared this request with the responsible key account manager at FIEGE. Is the employee allowed to answer?

No. First the employee must consult the key account manager.

The FIEGE employee should politely ask the customer's employee to wait so that he can first discuss the matter internally. This customer request would involve disclosing sensitive productivity figures regarding FIEGE. Sensitive figures of the FIEGE Group may only be disclosed if they are released by an authorised person. In this case, the key account manager must also obtain approval to release this information from a manager of his business unit in advance.



3. CASE STUDY 5.1

The local editor of a newspaper calls you, an assistant to the branch management.

The editor has heard that FIEGE is planning an exciting new build project in the local area.

He questions you on various matters: What are the plans for access to the site?

What products are to be stored there? Will all environmental standards be complied with?

Etc. How do you behave?

You begin by thanking the editor for his interest and informing him that you are not authorised to answer these questions on behalf of FIEGE. Please take the editor's contact details and let him know that FIEGE's press office will be in touch with him soon. If the editor would prefer to contact FIEGE's press office himself, give him the contact details.

In both cases, please inform FIEGE's press office immediately.

5.2 CONDUCT ON SOCIAL MEDIA

The FIEGE Group is committed to mutual respect and equal treatment.

We distance ourselves from radical, racist or defamatory statements of any kind that may be made or spread by employees of our company on social media.

We will not tolerate the expression or dissemination of abusive criticism, insults or libellous statements by employees towards colleagues, supervisors or the FIEGE Group within social networks.

Information spreads quickly and uncontrollably in social media. Once published, information is very difficult to completely remove from the web.

Every one of us should carefully check how we are presenting ourselves and whether our information matches the facts.

Often employees state their role at FIEGE on social media or on social platforms such as XING, Facebook and LinkedIn. This must match the role title on the employee's employment contract or current FIEGE business card. Previous roles at FIEGE must also be specified correctly at all times.



CASE STUDY 5.2

You are moved by public discussion about a current political issue. You wish to express your personal opinion on a social network on the internet. You specified in your profile that you work for FIEGE. Can you publish your opinion without any problems?

Generally speaking, you are entitled to freedom of opinion, including on the internet.

Radical, racist or defamatory statements, abusive criticism, insults and libellous statements that may be linked with FIEGE or a customer of the FIEGE Group on social media can, however, be problematic for you. In some cases, it can have consequences under labour law. If you are unsure, please contact your HR department or the advisory office.

5.3 DATA PRIVACY

Conscientious handling of the personal data of our employees and business partners is a top priority for us. This is how we show our respect for our fellow humans and create the foundations for trust-based collaboration.

Each and every one of us is responsible for ensuring that personal data is protected at all times in our roles.

We will only collect, process and use personal data of our employees and business partners on the basis of statutory provisions.

We recognise the right of informational self-determination of our employees and business partners as regards information on, correction of, objection to, blockage of and deletion of their data. We document the use of data in a transparent manner.

Confidential information passed on by business partners is only used for the intended purpose. We expect our business partners to handle our confidential information in the same way.

Employees handling personal data will receive advice and support from the legal department and the data privacy officer.



CASE STUDY 5.3

An employee of a recruitment agency that you work with regularly calls you, an assistant to the branch management, and asks you for the private address of a shift manager. The shift manager has been ill for several weeks and the employee says that he wants to pay the shift manager a visit. Are you allowed to give out the information?

No. You must first obtain consent from the employee to the disclosure of this personal information.

5.4 CONDUCT TOWARDS AUTHORITIES

We ensure that our employees act with integrity when dealing with authorities.

All information provided to an authority must be truthful and correct.

Official enquiries, e.g. requests for information, are processed in accordance with the statutory provisions. If the subject of the enquiry is new or unclear to the person dealing with the enquiry, the Legal department or HR Legal department should be consulted.



CASE STUDY 5.4

You, an operative manager, receive a request from the trade supervisory board, which wants to check the working time accounts of your employees. You pass the request on to the branch manager. Did you behave correctly?

That procedure is correct. In addition, if you are unsure about handling queries from authorities or official bodies, you should contact the central HR Legal or Legal division.



5.5 REPORTING

As an internationally active company, the FIEGE Group observes all laws and regulations on reporting in Germany and abroad.

The correctness, accuracy and reliability of our reporting determines our credibility in society.

Efficient control systems ensure that the figures from reporting form a solid foundation for important strategic business decisions of the FIEGE Group.

All employees whose role involves invoicing and reporting are responsible for ensuring that reporting is carried out honestly, correctly and in a timely manner.

Any form of manipulation of reporting is prohibited.



CASE STUDY 5.5

Due to a high level of illness, a branch is incurring high staff costs in the current financial month. The branch management and the local controlling decide to list a special sale that is very likely but not yet achieved for the current month in the monthly profit and loss account. Is this procedure correct?

No. Both sales and expenses must be displayed in the monthly result in the month in which they arose. Measures to balance out fluctuations in results (smoothing of results) are not permitted.

If the service has not yet been rendered by the accounting period, the sale may only be displayed in the amount of the service rendered. The sale must then be displayed in subsequent periods in line with the degree of completion.

Should sales revenues and realisation of the corresponding expenses be separate from one another in time, the expenses expected for the sale must be deferred in the month of the sales revenues and implemented in the course of subsequent months in line with the scope of the realised expenses.





6.0 IMPLEMENTATION OF THE PRINCIPLES OF CONDUCT

What matters

Consistent implementation of the rules of conduct makes a valuable contribution towards ensuring that we as a company act appropriately in the business environment and when dealing with the public and official bodies.

Implementation can only be successful if we work together.

The rules of conduct unite all employees of the FIEGE Group, regardless of national boundaries and cultures. Every employee must know and read the rules.

Managers of the FIEGE Group function as role models when it comes to implementation.

6.1 CHECK YOUR DECISIONS AND ACTIONS

Are your decisions and actions in line with the rules of conduct of the FIEGE Group? Answering the following questions will provide you with important pointers:

- Do my decisions and actions take account of the regionally applicable laws and regulations?
- Do my decisions and actions take account of the provisions of competition and antitrust laws?
- Am I able to make my decisions for the benefit of my company, free from conflicting loyalties?
- Am I able to act in the best interests of my company, free from personal interests?
- Can I reconcile my decisions and actions with my own conscience?
- Are my decisions and actions transparent?

- Would my decisions and actions withstand an investigation?
- Do my decisions and actions maintain the reputation of my company?
- Do my decisions and actions protect confidential information and the intellectual property of my company?
- Do I make decisions and act with integrity when working with authorities?

If you can answer each of these questions with "yes", your decisions and actions are in line with our rules of conduct.

However, should you be in doubt, please contact your superior or the advisory office in confidence.



6.2 RESPONSIBLE PERSONS

The rules of conduct set out in the Code should enable us to minimise ethical risks in all divisions of the FIEGE Group. In order to achieve this goal, the Code must be present for all employees of our company.

We will support dissemination of and compliance with the Code through targeted measures.

Our employees in managerial positions have a particular role to play. They must ensure that their employees know, understand and follow the rules of conduct in their area of responsibility.

They should also support employees that bring forward concerns or information about failure to comply with the rules of conduct in good faith. "In good faith" means that the employee is convinced of the correctness of what they are saying, regardless of whether a subsequent investigation confirms it or not.

We strictly prohibit any reprimands or sanctions against employees that express their concerns in good faith.

Precise knowledge of the Code is necessary for managers that are greatly responsible for the implementation of the rules of conduct. These include executives, members of the management of the business units, branch and division managers, and managers of the central divisions of the FIEGE Group. We expect that they will – without exception – set a good example and encourage others to behave in the same manner.

We will not tolerate misconduct or violations of the rules of conduct set out in the Code.

We follow the principle of proportionality when implementing the necessary measures. In each individual case we will carefully examine which consequences are appropriate and necessary.

Exceptions from compliance with the rules of conduct shall require approval from a member of the Executive Board of the FIEGE Group. In explicitly designated cases, the advisory office may also approve an exception.

The Executive Board of the FIEGE Group will regularly check the consent of the Code, and adapt it if required.

6.3 COMPLIANCE OFFICE

The FIEGE Group has set up an advisory office to be available to all employees.

This office will provide support in complying with the rules of conduct set out in this Code.

We encourage our employees to contact their direct superior or the advisory office in the event of questions or uncertainty regarding compliant conduct.

All queries, questions and concerns associated with the rules of conduct will be taken very seriously. Your issue will always be treated as strictly confidential.

The colleagues at the advisory office will investigate the presented matter based on the rules of conduct set out here and – where necessary – issue a written statement and recommendation.

In order to maintain an open corporate culture, we request that you give your name when making a report. Depending on the circumstances, your identity may need to be disclosed to authorities or courts if the applicable law requires such.

Should giving your name not be possible under these conditions, we will also accept anonymous reports.

Contact:
Fiege Logistik Stiftung & Co. KG
Advisory office
Joan-Joseph-Fiege-Straße 1
48268 Greven

vertrauensstelle@fiege.com



ACTING WITH INTEGRITY TOGETHER

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