

LEGRANT Freight Management B.V.
Code of Conduct

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Introduction

The Code of Conduct applies to all employees and all individuals who enter into a working or service relationship with Legrant Freight Management B.V.

Each employee is responsible for reading, understanding, and following the Code.

Employees who violate the Code are subject to discipline, up to and including termination of employment. Anyone who violates the law may also be subject to civil and/or criminal penalties.

Mission

We strive to provide our customers with the highest quality and Leading Logistics Solutions while we continuously improve Customers' global Competitiveness with Respect for People and Planet.

Our Values

Customer Orientation

We Strive To:

- ☞ We are committed to exceed the expectations of our customers.
- ☞ Work Safely.
- ☞ Deliver innovative and competitive logistic services.
- ☞ Act with Integrity. ...
- ☞ Value Our People. We respect each other, recognizing geographic and cultural differences.

Risk Taking

We Strive To:

- ☞ We stimulate innovation and creative thinking
- ☞ Embrace change and challenge the existing conditions.
- ☞ Listen to the ideas and viewpoints of our colleagues.
- ☞ Learn from our successes and mistakes.

Discipline

We Strive To:

- ☞ Conduct business with determined integrity and competence.
- ☞ Ensure a safe, clean and injury-free workplace.
- ☞ Make and meet commitments.
- ☞ Properly plan, fund and staff Projects.
- ☞ Pay attention to details.

Great Place to Work

We Strive To:

- ☞ Be open and straight.
- ☞ Promote a challenging work environment that develops our diverse workforce.
- ☞ Work as a team with respect and trust for each other.
- ☞ Recognize and reward accomplishments.
- ☞ Manage performance fairly and firmly.
- ☞ Be a benefit to our communities worldwide.

Quality

We Strive To:

- ☞ Achieve the top-notch standards of excellence.
- ☞ Do the right things right
- ☞ Continuously learn, develop and improve
- ☞ Take pride in our work

Results Orientation

We Strive To:

- ☞ Set challenging and competitive goals
- ☞ Focus on output
- ☞ Assume responsibility
- ☞ Constructively confront and solve problems.
- ☞ Execute flawlessly



Code of Conduct

Uncompromising integrity and professionalism is the cornerstones of Legrant's business. In all that we do, Legrant supports and upholds a set of core values and principles. Our future growth depends on each of us understanding these values and principles and continuously demonstrating the uncompromising integrity that is the foundation of our company.

The Code of Conduct sets the standard for how we work together to develop and deliver product, how we protect the value of Legrant and how we work with customers, suppliers and others. All of us at Legrant must abide by the Code when conducting Legrant-related business.

The Code affirms our five principles of conduct:

- Conduct Business with Honesty and Integrity
- Follow the Letter and Spirit of the Law
- Treat Each Other Fairly
- Act in the Best Interests of Legrant and Avoid Conflicts of Interest
- Protect the Company's Assets and Reputation

Conduct Business with Honesty and Integrity

One of our core values is to conduct business with uncompromising integrity and professionalism. We put this value into practice by:

- Communicating clearly, respectfully, and professionally in business,
- Treating customers, suppliers, and others fairly,
- Acting as a responsible corporate citizen, respecting human rights, and managing the impact of our business on the world around us, and
- Keeping accurate financial and other books and records.

Communicating Clearly and Professionally in Business

We value clear, respectful and professional communication in all of our business interactions. Ambiguous and unprofessional communications – whether oral or written – can harm Legrant.

Even well-intentioned communications can be misinterpreted. Examples of communications include email, presentation materials, voicemails, text messages, and instant messaging, as well as content in social media and websites.

Conducting Business with Customers, Suppliers, and Others

Our success is based on strong relationships of mutual respect and trust with our customers, suppliers, and others. To maintain these strong relationships, we treat everyone we deal with the way we would expect to be treated: with fairness, honesty, and respect.

In our marketing and in our interactions with customers and potential customers, we always represent Legrant services fairly and accurately.

Being a Responsible Corporate Citizen

Legrant has a reputation as a responsible corporate citizen. For us, corporate responsibility means achieving business success in ways that demonstrate respect for people and the planet and uphold the values and high standards of ethics as laid down in the 10 principles of The United Nations Global Compact and our environmental health and safety policies.

We demonstrate respect for people and the planet and ask all our employees to consider the short and long-term impacts to the environment and the community when they make business decisions. In all our activities, we need to uphold Legrant's reputation as a role model for socially responsible behavior.

Preparing Accurate Financial and Other Records

Our financial and other business records shape the business decisions we make. We are responsible for ensuring that Legrant's books and records are full, fair, accurate, timely, and understandable reflections of the company's operations and business activities.

Any records required by our jobs, such as expense reports must be accurate and complete.

If questions arise, ask a direct for assistance. If you become aware of records that may be inaccurate, report the situation immediately to the Director. We do not support or condone preparing false records under any circumstances.



Follow the Letter and Spirit of the Law

As a European company Legrant must comply with the laws of the countries in which it does business. We are each responsible for knowing and following all applicable laws or regulations. We also must act in a manner that upholds the spirit and the intent of the law. Where the Code or company guidelines differ from local laws or regulations, we must always follow the higher standard. If you believe the requirements of the Code conflict with local law, consult the Director.

Violations of laws and regulations have serious consequences, both for the company and for the individuals involved. Therefore, when questions arise on these or other legal matters, you should always seek guidance.

Some of the legal topics we encounter include antitrust, anti-corruption, environment, import- export, insider trading, intellectual property, privacy, and public communications.

Antitrust

Antitrust laws, sometimes also called competition laws, govern the way that companies behave in the marketplace. Antitrust laws encourage competition by prohibiting unreasonable restraints on trade. The laws deal in general terms with the ways companies deal with their competitors, customers, and suppliers. Violating antitrust laws is a serious matter and could place both the company and the individual at risk of substantial criminal penalties.

In all regions and countries where we do business, we are committed to competing vigorously but fairly for suppliers and customers.

To adhere to antitrust laws, we must not:

- ☐ Communicate with any competitor relating to price, any term that affects pricing, or production levels,
- ☐ Divide or allocate markets or customers,
- ☐ Agree with a competitor to boycott another business, or
- ☐ Put inappropriate conditions on purchases or sales.

Bribery and Anti-Corruption

Many countries have bribery and other anti-corruption laws that are intended to prevent companies and individuals from gaining an unfair advantage and from undermining the rule of law. We must never offer or accept bribes or kickbacks, and must not participate in or facilitate corrupt activities of any kind. This prohibition on offering or paying bribes also applies to third parties acting on Legrant's behalf, such as contractors or consultants. We must never engage a third party who we believe may attempt to offer a bribe to conduct company business.

Environmental Management and Compliance

A number of environmental laws, standards, requirements, and policies apply to our business operations, practices, and services. We have a responsibility to understand and follow these requirements, including:

- ☐ Conserving energy, water, raw materials and other natural resources,
- ☐ Managing materials and wastes properly, and
- ☐ Complying with environmental permits and health and safety requirements.

We support a precautionary approach to the materials we forward and strive to minimize the risk of spilling of hazardous materials and the environmental impact of potential incidents. We expect our suppliers and others to comply also with all applicable environmental, health and safety laws and standards in their operations.

Intellectual Property

We must use the confidential information of Legrant or others only for business purposes and disclose it only to those who are authorized and have a need to know. Even after we leave Legrant employment, we must continue to protect confidential information (whether Legrant's or another party's) and not use or disclose it without authorization. Furthermore, we must not request or encourage anyone to use or disclose privileged, proprietary, or confidential information unless they are authorized to do so by the owner of that information.



Privacy

Many countries have privacy laws that govern the appropriate collection and use of personal information, which includes any information relating to an identifiable individual such as an email address, physical address, payment card information or government identification number.

We are committed to protecting the reasonable privacy expectations of everyone with whom we do business, including our customers, consumers and employees. We believe responsible stewardship of personal information helps maintain trust in Legrant and in our products and services. We recognize the importance individuals place on the ability to control the collection and use of their personal information. As Legrant employees, we each have a responsibility to comply with our privacy and security requirements.

Public Communications

Only authorized employees may make any public statements on behalf of Legrant, whether to the media or in other external forums, including the Internet. This includes disclosing new or confidential information regarding Legrant through social media applications and websites. If you are contacted by a reporter or the public on a topic on which you are not authorized to speak, refer the inquiry to the Management.

Treat Each Other Fairly

One of our core values is to work as a team with respect and trust for each other. We strive to uphold open and honest communication and to protect employees from discrimination, harassment, or unsafe practices.

Open and Honest Communication

We value the free flow of thoughts, ideas, questions, and concerns. We encourage employees to raise work-related issues or concerns as soon as issues or concerns arise. We do not tolerate any retaliation against employees for asking questions or making good faith reports of possible violations of law, the Code, or other guidelines.

Equal Employment Opportunities and Discrimination

We value diversity in our workforce, as well as in our customers, suppliers, and others. We provide equal employment opportunity to all employees. We do not discriminate employees on the basis of race, color, religion, sex, national origin, ancestry, age, disability, medical condition, genetic information, marital status, pregnancy, gender, gender expression, gender identity, sexual orientation, or any other characteristic protected by local law, regulation, or ordinance..

We follow these principles in all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs.

Safety

We comply with the safety laws, standards and guidelines that apply to our business. Sound safety practices are important in all of our workplaces.

To protect our employees, the public, and our communities, we conduct no activity without the proper safety precautions and produce no product without the proper safeguards.

We believe workplace injuries and illnesses are preventable. When we take care, employees and suppliers at our workplaces need to obey the safety requirements that apply to our job and workplace. We must not begin or continue any work activity contrary to safety requirements.

Act in the Best Interests of Legrant and Avoid Conflicts of Interest

A conflict of interest may occur when an employee's personal or family interests interfere—or even appear to interfere—with the employee's ability to make sound business decisions in the best interest of Legrant. We should not put ourselves in situations where we could be tempted to make Legrant business decisions that put our personal needs ahead of Legrant's interests.

Handling Conflicts of Interest

We recognize that a conflict of interest may arise without any willful action on our part or that changes in circumstances may create a conflict or appearance of a conflict in situations where previously none existed. If you become aware of a possible conflict of interest, disclose it immediately to your manager, reporting all pertinent facts and circumstances. The manager will determine, in consultation with the management board as necessary, whether a conflict of interest exists, what needs to be done to resolve the conflict, or whether you may proceed. Disclosure is mandatory; failing to disclose a conflict of interest is a violation of the Code



Protect the Company's Assets and Reputation

We spend considerable resources to develop and maintain assets used for the company's business. We each have a responsibility to comply with all procedures that protect the value of Legrant's assets, including physical assets, information, Legrant brands services, and its good name and reputation.

Protecting Physical Assets

Our physical assets include facilities, equipment, and computer and communications systems. We are to use these assets primarily for our business. As a narrow exception, we may use computer and communications systems for reasonable, personal use. We need to follow applicable security and use procedures to protect the company's physical assets from theft, loss, damage, and misuse, including unauthorized access. Report the theft, loss, damage, or misuse of company physical assets to Human Resources as soon as possible. While we respect employee privacy, we should not assume that our desk, cubicle, or use of compute devices or telephone equipment is private or confidential. Subject to local laws and under the guidance of Legal, we may search and review both incoming and outgoing communications and all device information, including any password-protected employee communications.

Maintaining Information Security

Proprietary information is another valuable company asset and includes internal and external communication; digital information stored on laptops, handhelds, wearables, desktops, servers, backups, and portable storage devices; and hard copy documents, verbal discussions, and interactions via social media channels. We need to take personal responsibility to safeguard both Legrant owned and third-party owned proprietary and confidential information from unauthorized disclosure, changes, or loss. We must comply with all company security policies and procedures for handling information assets and systems to ensure that we meet legal obligations, protect our reputation, and protect our investment in proprietary information.

Representing Legrant

The value of our reputation and good name must be upheld whenever we represent our company. In other cases, such as when speaking on business or technology topics in a public setting or posting on the Internet – including through social media applications and websites – you must make it clear that you are expressing your own views and not those of our company

Asking Questions and Reporting Concerns

Each employee is responsible for reading, understanding, and following the Code. Anyone who violates the Code is subject to discipline, up to and including termination of employment. Anyone who violates the law may also be subject to civil and criminal penalties. To help our company conduct business with uncompromising integrity and professionalism, every employee has the duty to report possible violations of the law, the Code, and other company guidelines.

Ways to Seek Guidance and Report Concerns

Because the Code cannot address every situation, you will need to seek guidance whenever unsure of the correct course of action. There are many ways to ask questions about the Code or raise issues. All employees of Legrant are encouraged to ask questions or raise concerns with their direct manager or internal groups who specialize in handling such questions or issues, including Human Resources, as soon as possible after they arise. In accordance with Legrant's open communication policy, employees of Legrant can raise issues about the Code with the Management.

Non-Retaliation Policy

We do not tolerate any retaliation against anyone who in good faith reports possible violations of law, the Code, or other company guidelines, or who asks questions about on-going or proposed conduct. Employees who attempt to retaliate will be disciplined. Employees who believe they have experienced retaliation for reporting possible violations should contact a local representative in Human Resources.

Approvals and Waivers

The Code sets out expectations for our company's conduct. When certain situations require permission from management or another person before taking action, you need to raise the issue promptly to allow enough time for the necessary review and approval. In a particular circumstance we may find it appropriate to waive a provision of the Code. To seek a waiver, speak with a manager, who will consider the request in consultation with others.

Reminders

The Code serves as our guide for conducting business with integrity. It is not an employment contract and confers no rights relating to employment. The Code is not a complete list of company guidelines. You are expected to know and comply with all company guidelines related to your job. Violation of these other guidelines may also result in discipline, up to and including termination of employment.