



# Code of Conduct

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# Foreword

## Dear Employees

Economic success and social responsibility represent two inseparable corporate goals that are very important to us. From our point of view, responsible and legal behaviour, not only towards customers, business partners and colleagues but also toward society and the environment, should be matters of course. This understanding forms the basis of our "Mission, Vision, Values" concept, whose goals and core values lead our activities. In this Code of Conduct, we would like to solidify the requirements on our behaviour and corporate activities.

A central function of the Code of Conduct is to make employees aware of current laws and company regulations and sensitise them to legal risks in their everyday work. The code of conduct summarises

laws and regulations that are especially relevant for us as a company.

As a guideline for our decisions and behaviours, the Code of Conduct outlines binding standards for responsible behaviour towards business partners and the public, but also for behaviour within the company.



Nicolas Gallenkamp  
Executive Partner (CEO)



## Validity

This Code of Conduct applies to all employees of the NOSTA Group. It encompasses binding behavioural principles and guidelines to be adhered to by all, thereby contributing to ensuring the long-term success of our company. Breaches of the code of conduct will not be tolerated and will have disciplinary consequences. Breaches of current legal norms will also incur criminal and liability consequences.

All employees are encouraged, to report any breaches of these ethical regulations or principles. The first point-of-contact in such cases is the immediate supervisor. Should the employee not wish to or is unable to report to his or her supervisor, he or she can call the internal tip hotline or send an e-mail.

Should an employee notice that a crime has been committed, that employee is obliged to report this information to the Management or Compliance Officer.

No employee is to experience any disadvantage born out of compliance with any of the laws, rights and regulations outlined in this Code of Conduct. Furthermore, we tolerate no reprisals against employees.

### Contact address:

Compliance@nosta-group.com

### Contact



**Frederik Mons**

Head of Division IT & Quality

**Tel.:** +49 5485 96512-621

**Mail:** FMons@nosta.de



## Basic Requirements & Principles

The trust of our business partners, customers and the public in the responsible, lawful behaviour of our employees is crucial to our company's reputation and success. Therefore, a great degree of social and ethical competence is expected of our employees.

### Corporate Values

Respect, Integrity, Trust, Sustainability and Responsibility are the five values at the core of our corporate philosophy. We always treat our customers, business partners and colleagues with the utmost respect. We maintain trusting cooperations based on partnership. We pursue the same objective collectively day to day: to become a little better, constantly.

### Corporate Structure

The corporate structure we live is characterised by the fact that we are always ready to listen to our employees. We take their issues seriously. As employers, we are flexible and can react quickly to our employees' needs, thanks to flat hierarchies and short decision-making processes.



# Basic Requirements & Principles

## Dealing with Customers and Business Partners

Fairness, openness and helpfulness characterise our treatment of our customers, business partners and employees. The basis for this is trust in our counterpart's abilities, valuing them personally and in terms of performance. Personal value, privacy and the personal rights of our business partners and colleagues are always highly respected.

## Discrimination Ban

We respect every employee, irrespective of gender, age, ethnicity, skin colour, religion or any other personal characteristic. We are committed to equal opportunities and encourage a work environment characterised by respect and tolerance. All employees have the right to fair, polite and respectful treatment by superiors and colleagues. We tolerate no discriminating behaviour. Harassment and any form of undesired physical contact are forbidden.

## Supporting Qualifications

As a family-run, international, full-service logistics provider, we live from our employees' know-how and specialist knowledge. In order to meet our own quality standards, we invest in various training and further education opportunities for our employees. Apart from external training courses, our own NOSTA academy offers a comprehensive programme of seminars in order to provide individual support for our employees' requirements and to develop their performance potential.



## Human Rights and Child Labour

The NOSTA Group assumes responsibility for its employees and aims to create and maintain an attractive working environment. As the NOSTA Group, we value fair payment for both male and female employees. Appropriate working hours are a matter of course for us and we utterly condemn any form of enforced or child labour.

No person under the legally required minimum age of the respective country may be employed by the NOSTA Group. Youths are to be protected from economic exploitation, carrying out dangerous tasks, or activities, which may affect their education or jeopardise their health, mental, moral or social

development. The NOSTA Group is committed to the prohibition of any form of forced labour. This includes all manner of work or service-provision enforced on a person under threat of punishment or which a person does not provide voluntarily. The NOSTA Group also requires its suppliers and subcontractors to prohibit forced labour in their companies.



# Occupational Safety and Health

Occupational safety and health protection are high priorities in our company. Safety at work and healthy, motivated staff are the cornerstones of our success and the continuing growth of our company group.

It is our aim, to create and maintain a safe working environment. For this reason, occupational safety and health protection are integral to all activities and are integrated into the company organisation and processes.

All employees are obliged to cooperate as far as possible with the implementation and optimisation of occupational health and safety measures in order to achieve effective occupational health and safety.



# Occupational Safety and Health

## Our ten health and safety principles for safety at work are:

1. Every work-related injury or illness is avoidable.
2. We accept no activity that is harmful to health or safety.
3. The consumption of drugs or alcohol or working under the influence of either is expressly forbidden during work hours.
4. The Management makes sufficient resources available.
5. All Managers perform their role model function consciously.
6. Every employee is responsible for maintaining their health and is partly responsible for the health of their colleagues.
7. The active involvement and qualification of our employees is crucial.
8. Rules and regulations are adhered to. Any defects are to be removed immediately when noticed.
9. All incidents are investigated in order to avoid future injury and damage to property.
10. We are subject to regular review by audit at all levels.



# Sustainability and Environmental Protection

Sustainability defines the balance between ecology and social responsibility. As a family-run company with 40 years of experience in the industry, we internalised the concept of sustainability early on and implement specific measures to harmonise economy and ecology, as illustrated in our regular sustainability report.

## Ecological activity

We are permanently committed to reducing harmful CO<sub>2</sub> emissions and conserving resources by using renewable energies. Green logistics is not just a question of image but a mission that we live, as evidenced by our modern vehicle fleet, the use of alternative modes of transport and the installation of photovoltaic systems on our green hall roofs.

## Economic activity

We also apply the principle of sustainability to our economic activities, among which are the long-term, future-proof overall orientation of our company as well as the responsible use of financial means and resources. We make an important contribution to the protection of our environment through the efficient exploitation of transports, continuous optimisation of work processes and procedures as well as investment in innovative distribution and storage solutions.

# Sustainability and Environmental Protection

## Certifications and Projects

We are dedicated to active environment and energy management, as verified by our various certifications. DIN EN ISO 14001 certification affords us the possibility to optimally record our environment management and to document this for our customers and business partners. The certification contains statements on, among other things, life cycle assessments, environmental indicators and our environmental performance assessment.

Additionally, following an energy audit in 2015, we received DIN EN 16247-1 certification with the objective of setting out our energy consumption and

improving our energy efficiency. In order to investigate our energy-saving potential further, we have been participating in the project, "Energie-Scouts" since the year 2017. As part of the Germany Industry and Trade's (Deutschen Industrie- und Handelskammertages (DIHK)) "Mittelstandinitiative Energiewende" we are glad to be able to make an important environment protection contribution by reducing our operational energy consumption.



## Compliance

We tolerate no form of bribery, corruption or blackmail. We do not allow ourselves to be influenced in our daily activities or our behaviour by gifts, invitations or any other donations. Suppliers and service providers are carefully selected according to objective criteria and make business decisions in the best interests of the NOSTA Group. The NOSTA Group's reputation depends upon each and every one of our employees doing the right thing. There is no justification for illegal corporate activities. We accept that, as a result, possible business opportunities may be forfeited.

Invitations, for example in the context of advertising measures, which serve the purpose of promoting business relations or presenting services, are permissible provided that they are modest.

However, such benefits may only be accepted or granted if they serve a legitimate business purpose and are not accepted or granted in return for an unlawful advantage. Such benefits may not be of inappropriately high value and may neither exceed normal business boundaries nor disproportionately improve the living standard of the recipient. Affording any advantages to public officials is not permitted. We work in accordance with all applicable anti-corruption laws. We prevent breaches of the law, keep our books and records adequately, and document all transactions and sales of assets.



## Money Laundering

We conduct business exclusively with reputable business partners, who act according to legitimate business practices. We comply with all laws regarding combating money laundering. Furthermore,

the NOSTA Group maintains no business relationships with companies with criminal or terrorist backgrounds.

## Data Protection

We receive sensitive data regarding customers, employees and service providers in the course of our day-to-day business. Use of this data is restricted to certain, defined, specific purposes, arising from corporate necessity, in accordance with applicable data protection law. No personal data is ascertained or processed without the agreement of the party concerned or legal admissibility. All executives and

employees will treat personal data (especially employee data) and the data of our customers and business partners with care and strict confidentiality.



## Corporate Property

The NOSTA Group's commercial success is based on the commitment of its employees and their many years of experience. All employees must therefore ensure that the NOSTA Group's corporate and trade secrets, and those of its business partners remain strictly within the company. Disclosure of corporate or trade secrets, revealing such to third parties or use for individual purposes without permission, is forbidden.

We expect our employees to deal with the company's assets responsibly and to reach business decisions on a sound commercial basis.

All NOSTA Group documents, especially financial reports, accounting documents and invoices must reflect all facts correctly and transparently. Employees are not authorised to use company resources for personal purposes, unless this has been expressly permitted in their employment contract, separate agreement or by their superior. Furthermore, it is forbidden for employees to use NOSTA Group computer systems to view, save or distribute pages or news of illegal content.



## Conflicts of Interest

Every employee can face situations in their daily work routine in which the interests of the company are contrary to their own. Private interests are to be strictly separated from those of the NOSTA Group.

Employees affected by a potential or actual conflict of interest must report this to their supervisor, manager or compliance officer with a view to achieving a mutually satisfactory solution.

## Donations

Addressing important social issues and actively committing to them is part of our tradition and our self-image. Which is why we have been dedicated to a number of social projects and diverse charity organisations in the environs of our many branches over the years years. The NOSTA Group's donations are always made transparently as corporate commitments and on a voluntary basis, without any

expectation of quid-pro-quo. In order to guarantee transparency, the grounds for donation, recipient and conformation of donation are documented. The NOSTA Group does not make any direct or indirect donations to political organisations, parties or individual politicians.



## Legal Compliance

We abide by the laws and regulations of the respective countries in which we do business. This applies to our companies as a matter of course. This is the only way to ensure our commercial success worldwide. We expect the same fundamental understanding from our business partners. Furthermore, we also comply with all commercial control regulations such as import and export controls for military goods, dual-use goods and sanction regulations, which serve international peace and stability.

Any breach of valid laws or regulations can have serious consequences, such as criminal punishment, damage compensation or reputational damage. Where national laws or other relevant regulations differ from those of the Code of Conduct, the stricter regulation has priority.



## Fair Competition

We are committed to fair competition as a prerequisite of the social market economy and abide by the laws protecting competition. All employees are obliged to comply with fair competition regulations. Examples of forbidden behaviours, which we do not tolerate, are illegal insider trading, price agreements

and market partitioning with competitors, spying and theft. We also categorically reject all illegal methods of acquiring information on competitors and their activities.

