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Global Logistics



# SUPPLIER CODE OF CONDUCT OF GEIS GROUP

➤ **03.2024**

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## PREAMBLE TO THE SUPPLIER CODE OF CONDUCTS OF GEIS GROUP

Responsible, sustainable, and lawful conduct is part of the values of Geis Group and is firmly embedded in the company's strategy. The core values and business principles are defined in the Code of Conduct for Suppliers and Business Partners, as well as in the Compliance Policy for Employees. The corporate principles listed here apply throughout Europe at all locations and business areas of Geis Group. The following standards articulate the requirements for Geis Group's actions regarding human rights, labor standards, business ethics, as well as environmental protection, and are based on the following international standards:

- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights

Geis Group expects and demands from its suppliers and business partners that they act in accordance with applicable laws and principles, and in line with the core values and business principles Geis Group aims to impress with the quality and value of its services, as well as through successful and sustainable business operations in competition. The long-term success of our company also depends on how early we recognize risks and opportunities, and on our consistent compliance with laws, regulations, ethical principles, and voluntary commitments. We not only set high standards within Geis Group but also work along the entire value chain to uphold these values.

This is based on the simple realization that responsible actions and economic success are not mutually exclusive but rather mutually supportive. We expect this understanding and such an attitude not only from all our employees but also from our business partners. For future cooperation, Geis Group therefore agrees with its suppliers and business partners on the applicability of the following provisions for a shared code of conduct.

This agreement serves as the basis for all future deliveries. The contracting parties undertake to comply with the principles and requirements of the code of conduct and to endeavor to contractually obligate their subcontractors to adhere to the standards and regulations listed in this document. This agreement becomes effective upon signing. Violation of this code of conduct may ultimately serve as grounds for the company to terminate business relationships, including all related supply contracts.

Bad Neustadt, 8 March 2024

  
Jochen Geis  
Managing Partner  
Geis Group

Nuremberg, 8 March 2023

  
Hans-Wolfgang Geis  
Managing Partner  
Geis Group



## ② BUSINESS ETHICS AND MARKET BEHAVIOUR

### 2.1. Compliance with Laws

Suppliers and business partners are required to comply with all applicable laws and regulations. In cases where the Code of Conduct contradicts or violates applicable laws or regulations, the supplier and business partner must promptly inform Geis Group of the situation to determine how suppliers and business partners can act responsibly.

### 2.2. Confidentiality, Data Protection, and Intellectual Property

Suppliers and business partners commit to meeting the reasonable expectations of their clients, suppliers, customers, consumers, and employees regarding the protection of private information. Suppliers and business partners must comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transmitting, and disclosing personal information. Intellectual property rights must be respected, and technology and know-how transfers should be conducted in a manner that protects intellectual property rights and customer information.

### 2.3. Fair Business Practices

Fair business practices, fair advertising, and fair competition norms must be followed. Additionally, applicable antitrust laws must be applied, particularly in dealing with competitors, prohibiting agreements and other activities that influence prices or conditions. These regulations also prohibit agreements between customers and suppliers that restrict customers' freedom to autonomously determine their resale prices and other conditions.

### 2.4. Integrity, Bribery, and Extortion

The highest standards of integrity must be upheld in all business activities. Suppliers and business partners must maintain a zero-tolerance policy towards all forms of bribery, corruption, extortion, and embezzlement. Appropriate procedures for monitoring and enforcing these standards must be implemented to ensure compliance with anti-corruption laws.

### 2.5. Prevention of Money Laundering and Terrorism Financing

Suppliers and business partners must not directly or indirectly support money laundering and terrorism financing in any form. They must comply with the national and international legal obligations applicable to them for the prevention of money laundering.

### 2.6. Sensitivity in Dealing with Conflicts of Interest

Suppliers and business partners should always act in the best interest of their company. They commit, both internally and towards Geis Group, to avoid bias, other conflicts of interest, and undue influence from others in the course of their business activities. In the event of such conflicts arising, they are required to promptly report them to Geis Group.

### 2.7. Compliance with Export Control and Customs Regulations

As a globally operating company, Geis Group must comply with numerous national and international customs, export control, and embargo regulations that govern and restrict the free movement of goods. Suppliers and business partners ensure that their export and import business practices are in compliance with all applicable laws, guidelines, and regulations, and that they adhere to international sanction lists. For exports, correct classification should be carried out, and relevant information should be provided, if required (e.g., export licenses or other permits).

### 2.8. Financial responsibility and accurate records

The Geis Group places a high value on transparency and accuracy. Our suppliers are committed to maintaining their books and records in accordance with applicable laws and generally accepted accounting principles.



## **3 HUMAN RIGHTS AND WORKING CONDITIONS**

### **3.1. Respect for the Fundamental Rights of Employees**

Suppliers and business partners must recognize and commit to upholding the internationally recognized human rights of their employees, treating them with dignity and respect.

### **3.2. Respect for the Fundamental Rights of Employees**

Suppliers are committed to promoting workplace diversity and inclusion by ensuring that all employees, regardless of their personal backgrounds, characteristics or identities, can work in a respectful, supportive and enabling environment. Suppliers shall ensure that equal opportunities and equal rights are guaranteed in recruitment, promotion, remuneration and all other aspects of employment.

### **3.3. Prohibition of Discrimination**

Discrimination and unequal treatment of employees in any form are prohibited, unless justified by the requirements of employment. This includes, for example, discrimination based on gender, race, caste, national, ethnic or social origin, color, disability, health status, political belief, origin, worldview, religion, age, pregnancy, or sexual orientation. The personal dignity, privacy, and individual rights of each person must be respected.

### **3.4. Prohibition of Child Labor**

Child labor must not be used at any stage of service provision. Suppliers are urged to comply with the International Labor Organization (ILO) recommendations regarding the minimum age for employment of children. According to these recommendations, the age should not be less than the age at which compulsory schooling ends under the law of the employment location, and in any case, not under 15 years. Children must not be hindered in their education or development through employment. Their dignity must be respected, and their safety and health protected. In line with the ILO Core Labor Standards, Geis Group adheres to the minimum age for employment and strictly rejects any form of child labor. If children are found to be working, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected. Accordingly, children under the age of 18 must not be engaged in work that is harmful to their health, safety, or morals. Special protective provisions must be observed.

### **3.5. Prohibition of Forced Labor**

In accordance with the ILO Core Labor Standards, Geis Group rejects the use of both forced labor and compulsory labor in any form within its business activities. Geis Group calls for the elimination of all forms of forced labor and expects its suppliers and business partners to contribute to this goal by implementing appropriate measures and control mechanisms - not only within their own organization but also within their supply chains. No forced labor, slave labor, or similar forms of labor shall be used. All work must be voluntary and free from the threat of punishment. Employees must have the freedom to terminate their employment at any time. Additionally, there must be no unacceptable treatment of workers, such as mental or physical abuse, sexual and personal harassment, or humiliation. The hiring or use of security forces is prohibited if their presence results in inhumane or degrading treatment, physical harm, or impairs freedom of association.

### **3.6. Health Protection and Safety in the Workplace**

Suppliers and business partners are responsible for providing a safe and healthy working environment. Necessary preventive measures against accidents and health hazards associated with the work should be implemented through the establishment and application of appropriate occupational health and safety systems. Excessive physical or mental fatigue should be prevented through suitable measures. Furthermore, employees should be regularly informed and trained on applicable health and safety standards and measures.

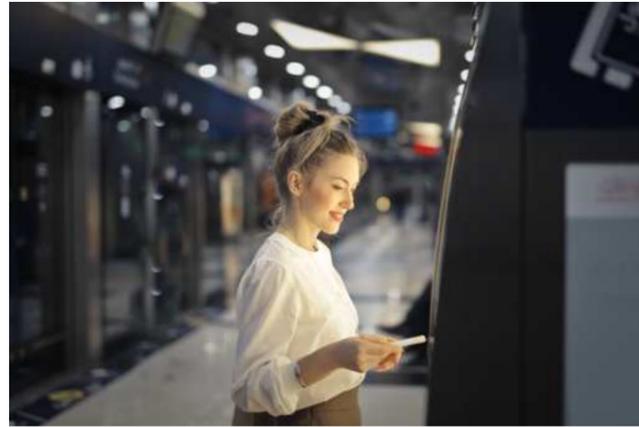


### 3.7. Fair Working Hours

Geis Group expects its suppliers and business partners to comply with the applicable national legislation on working hours, compensation, minimum income, and social benefits, as well as industry standards. The scheduling of working hours and breaks should consider both operational and individual needs. In the absence of national statutory regulations on working hours, the international standards of the ILO apply.

### 3.8. Fair Remuneration

Remuneration for regular working hours and overtime must comply with the national statutory minimum wage or industry-specific minimum standards, whichever is higher. Employees are entitled to all legally mandated benefits. Deductions from wages as a disciplinary measure are not permitted. The supplier must ensure that employees receive clear, detailed, and regular written information on the composition of their remuneration.



### 3.9. Freedom of Association

Geis Group acknowledges its social and societal responsibility. It works collaboratively and respectfully with all employees, employee representatives (works councils), and trade unions. It aims to strike a fair balance between the company's economic interests and the interests of its employees. Even in challenging situations, the goal is to establish and maintain a solid foundation for constructive cooperation. Suppliers and business partners grant their employees the right to form and join associations, in accordance with the respective national laws, and to represent their interests. Employee representatives are protected against discrimination. Employees must not be discriminated against based on their involvement in the formation, membership, or participation in such organizations.



## 4 SUSTAINABILITY

# ➤ SUSTAINABILITY IS AN ESSENTIAL ELEMENT

of the Geis Group's mission statement and an integral part of its business strategy. The primary goal is to take responsibility for the impact of its activities on society and the environment. The overarching objective is to contribute to the sustainable development of society. In the context of procurement, sustainability means that processes, products, and services should be sourced in a way that considers a variety of social, environmental, and economic factors from production to disposal while minimizing their impact on the environment and people. The Geis Group particularly expects its suppliers and business partners to adhere to these principles, as it forms part of the supplier selection and evaluation process. Furthermore, it is expected that these standards are also implemented in their downstream supply chain.

## 4.1. Environmental Protection

Suppliers and business partners must not deprive legitimate rights to land, forests, or bodies of water that secure the livelihoods of individuals. Harmful soil alterations, water and air pollution, noise emissions, and excessive water consumption should be avoided if they harm people's health, significantly impair natural resources for food production, or prevent people from accessing clean drinking water or sanitation facilities.

## 4.2. Handling of Conflict Minerals

If applicable, suppliers and business partners should establish processes for conflict minerals such as tin, tungsten, tantalum, gold, and other resources (e.g., cobalt) in accordance with the guidelines of the Organization for Economic Cooperation and Development (OECD) to promote responsible supply chains from conflict and high-risk areas. Melting and refining facilities without adequate, audited due diligence processes should be avoided.

## 4.3. Treatment and Discharge of Industrial Wastewater

Wastewater from operations, manufacturing processes, and sanitary facilities should be characterized, monitored, verified, and treated before discharge or disposal. Additionally, measures should be implemented to reduce wastewater generation.

## 4.4. Management of Air Emissions

General emissions from operations (air and noise emissions) as well as greenhouse gas emissions should be monitored and treated as necessary. The supplier also has the responsibility to monitor their exhaust gas cleaning systems and is encouraged to find economical solutions to minimize any emissions.



## 4.5. Handling of Waste and Hazardous Substances

Suppliers and business partners follow a systematic approach to identify, handle, reduce, and responsibly dispose or recycle waste. The prohibitions on the export of hazardous waste in the Basel Convention of March 22, 1989, in its current version, must be observed. Chemicals or other materials that pose a hazard when released into the environment are to be identified and handled in a manner that ensures safety during their handling, transportation, storage, use, recycling, or reuse, as well as their disposal. Mercury is to be used in accordance with the prohibitions of the Minamata Convention of October 10, 2013, and persistent organic pollutants in line with the Stockholm Convention of May 23, 2001, in its current version.

## 4.6. Reduction of Resource Consumption and Natural Resources

The use and consumption of resources during production and the generation of any type of waste, including water and energy, should be reduced or avoided. This can be achieved either at the source or through processes and measures such as modifying production and maintenance processes or company operations, using alternative materials, achieving savings, recycling, or reusing materials.

Energy consumption should be monitored and documented. Economical solutions should be sought to improve energy efficiency and minimize energy consumption.





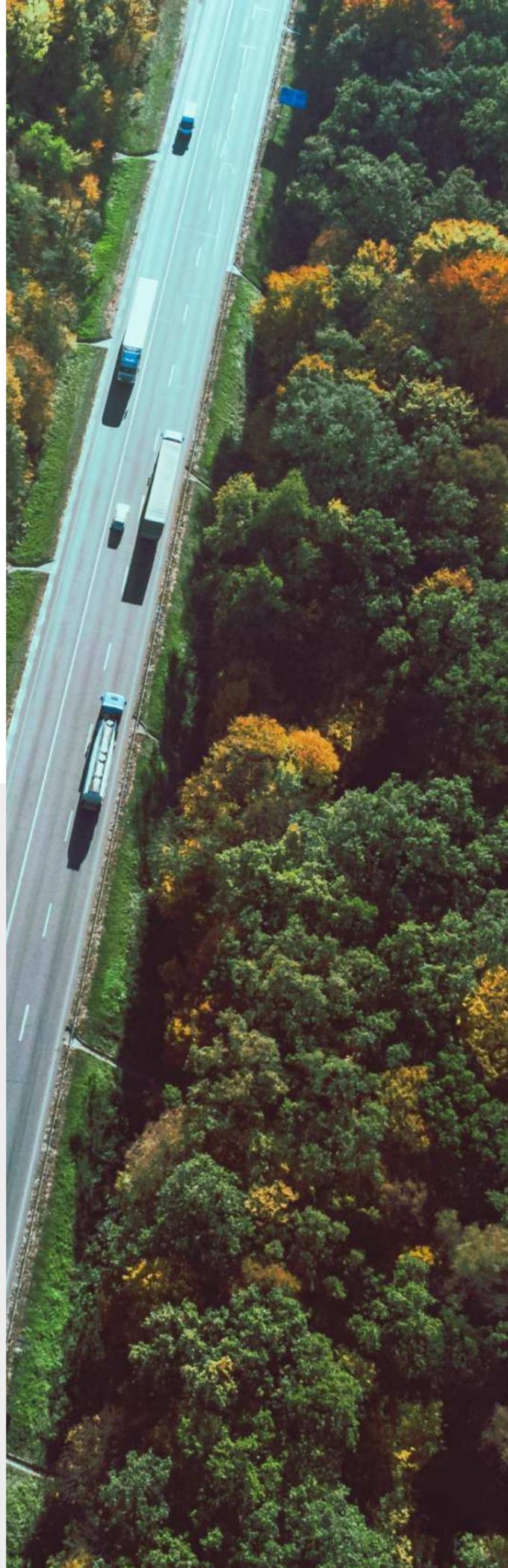
#### 4.7. Renewable Energy

Suppliers commit to actively use renewable energy sources such as solar, wind, hydropower or biomass where technically and economically feasible.

#### 4.8. Biodiversity, land use and deforestation

It is the supplier's responsibility to respect and preserve the diversity of species. Land shall always be used in accordance with applicable environmental laws and with the aim of maintaining and, where necessary, improving soil quality. The supplier undertakes to procure only wood and wood products from legal and sustainably managed sources.

They may not use or offer products that originate from illegally cleared forests. Furthermore, no activities may be carried out that lead to the destruction of protected forests, nature reserves or other sensitive ecosystems.



## 5 REPORTING MISCONDUCT

The Supplier Code of Conduct is part of all contractual agreements with suppliers and/or business partners of the Geis Group. In case of suspicion of a violation of the Supplier Code of Conduct, suppliers and business partners are expected to assist in investigating the matter. In the event of violations, the Geis Group reserves the right to take appropriate actions depending on the severity of the violation. These may include, but are not limited to, requesting immediate rectification of the violation, seeking damages, or terminating the contract and/or ending the affected business relationship.



Significant compliance violations can be reported through the webpage **Compliance | Geis Gruppe - Speditions- und Logistikunternehmen | Geis Gruppe (geis-group.com)**. It allows for confidential reporting and, if desired, anonymous dialogue with the Geis Group's Human Rights Officer. The supplier is required to disseminate this information received from the Geis Group regarding accessibility, responsibility, and the process of reporting misconduct to its employees in an appropriate manner.



## ⑥ SUPPLIER'S DECLARATION

## The supplier/business partner hereby declares:

To comply with the laws and regulations of the applicable jurisdiction(s).

We have received the „Code of Conduct“ of the Geis Group and hereby commit, in addition to our obligations under the supply contracts with the Geis Group, to adhere to the principles and requirements of this „Code of Conduct“. We will meet the ethical and social standards communicated by the Geis Group.

We will communicate the content of this „Code of Conduct“ to our employees, representatives, subcontractors, and suppliers, and ensure that all necessary measures are implemented.

Company:

Contact Person:

Phone:

E-Mail:

Address:

Postal Code / City:

Place, Date

Supplier's Signature and Company Stamp