



## **Code of Conduct F.W. Neukirch**

### **Preamble**

Our code of conduct formulates the values and principles for the entire company FW Neukirch GmbH & Co. KG as well as its direct and indirect subsidiaries and affiliated companies (hereinafter referred to as Neukirch). In detail, it is aimed at all of our employees, management, executives, the advisory board and our business partners alike. Each individual is obliged to meet the high expectations set by the code of conduct.

### **Management commitment**

Neukirch sees it as its duty to act economically, socially and environmentally consciously. The company strives to conduct its business competently on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes compliance with the applicable laws and the acceptance of cartel bans and restraints of competition. In any case, we want to avoid gaining undue advantages over customers, suppliers or competitors.

### **Standards of cooperation, non-discrimination**

In everyday working life, respect for colleagues, superiors and fellow human beings is the top priority in every situation. Each individual must therefore observe the following principles at all times:

- Respectful interaction with one another must be observed at all levels and hierarchies.
- Neukirch does not tolerate any discrimination, in particular in compliance with the legal requirements for reasons of race or ethnic origin, gender, religion or belief, disability, age or sexual identity.
- Neukirch also expects that every employee is treated fairly and not harassed, insulted or threatened.

Promotions and new hires are always free of discrimination.

We encourage constructive cooperation among our employees. Only through consistent teamwork can we develop successfully in the various business areas.

### **Customer orientation and fair competition**

Neukirch expects responsible, ethically correct and honest behavior from all employees. We record the wishes, needs and expectations of our customers and business partners in order to ensure a targeted implementation in services or other processes.

Our primary goal is to build a long-term and stable relationship with our customers and business partners on the basis of trust.



We are committed to fair competition and abide by the laws and rules. We refrain from agreeing on prices, conditions and strategies with competitors, suppliers and other companies that impede fair competition. We do not participate in any anti-competitive boycott.

## **Bribery and Corruption**

We do not tolerate any form of corruption and bribery, regardless of whether they damage our company assets or the assets of third parties. We use control mechanisms to ensure that bribery, theft, embezzlement, fraud, tax evasion and money laundering are prevented. Our employees are prohibited from accepting or giving favors of any kind (cash, travel, events, gifts, etc.) that are linked to an undue advantage (placing of order, project award, etc.). Our business partners are also urged to avoid conflicts of interest that pose a risk of corruption.

## **Handling gifts and other benefits as well as donations**

### a) Gifts to our employees

Our employees do not demand or accept any personal advantages from customers or suppliers that influence or could influence their own behavior with regard to their own work for the company. If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognized as a courtesy or courtesy (promotional gifts with the logo of the issuing company, such as a calendar or ballpoint pen - scatter gifts with a low value of up to max. 10 € value of goods).

The compliance officer or the head of department must be informed of gifts whose value exceeds the usual amount. If this is not possible, these gifts are to be rejected as a matter of principle.

### b) Gifts from our employees

Gifts on our part may also only be offered to the extent customary for the business relationship and in a materially appropriate scope. The recipient must not be able to associate any obligations that would influence his business decisions.

### c) Donations and sponsorship

The Neukirch company does not make donations to political parties, individuals or organizations whose goals contradict our corporate philosophy or damage our reputation. Donations are regulated exclusively by the management and always move within the framework of the legal system.

## **data protection**

We treat all personal data of our customers, business partners and employees with the greatest care. Business secrets or sensitive data must be treated with the strictest of confidence. They may only be disclosed to third parties if the persons actually need them and are entitled to receive them.

Our employees are obliged to take all measures to secure the data that are suitable to protect our IT system from both internal and external data theft.

The contractual confidentiality obligations must be observed during and also after the termination of the employment or business relationship.



## **Economic action in the context of legal requirements, as well as human rights, labor and social standards**

We oblige our managers and everyone involved to familiarize themselves with the laws, regulations and rules that are relevant to their area of responsibility and to comply with them without exception.

This applies in particular to import, export and domestic trade in goods, technologies or services, but also payment and capital transactions as well as the legal regulations for the protection of human rights.

Neukirch does not tolerate child or forced labor and expects this from its business partners at all times.

The business practices of our business partners and their suppliers must also take into account the applicable laws. A violation of economic embargoes and regulations on trade, import and export control must also be excluded by our business partners, as must terrorist financing, child labor and forced labor.

## **Security and Sustainability**

The protection of the environment and the climate are very important to us.

Our employees are required to treat all natural resources that are used in our company (e.g. energy, water, land) with care.

To protect our employees, we comply with all laws and regulations that affect health and safety in the workplace.

As part of their work, all employees are personally responsible for ensuring safety, health and environmental protection at their workplace to the best of their knowledge, skills and experience. Everyone is encouraged to identify areas that can be improved and to continuously work towards a better work environment.

To this end, our managers in particular take measures to create a healthy and risk-free work environment for our employees.

## **Compliant action and punishment of violations**

The Neukirch company undertakes to make every effort to comply with the principles and values described in this code of conduct.

In the event of a violation of the code of conduct, the management or division management will impose sanctions. Violations are recorded in functional and appraisal interviews. In the event of serious violations, disciplinary measures can be taken, up to and including termination of the employment relationship.

Violations committed by business partners will be punished under civil and criminal law.

Employees are asked to address misconduct by colleagues and encourage the person concerned to behave correctly.



**F.W. NEUKIRCH**  
*INTERNATIONALE SPEDITION*

**validity**

The Neukirch Code of Conduct comes into force on March 1st, 2021.

Bremen, February 2021

The Board



**Explanation**

With a legally binding signature, the undersigned declares: "We too want to support fair business competition in compliance with legal requirements. We undertake to comply with the F.W. Neukirch GmbH & Co. KG and its subsidiaries to observe and comply with the requirements and regulations listed. "

Company \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Last Name, first name \_\_\_\_\_

Position \_\_\_\_\_

\_\_\_\_\_  
place, date

\_\_\_\_\_  
stamp, signature

**Send the completed and signed code of conduct to your Neukirch contact person.**