

CODE OF CONDUCT OF THE PLANZER GROUP

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CODE OF CONDUCT OF THE PLANZER GROUP

Dear colleagues,

The Code of Conduct of the Planzer Group is derived from our guiding principles. It is the expression of a tradition of family entrepreneurship and responsibility which has been successfully applied by the company for many years. Responsibility is assumed equally towards our staff, our customers and business partners, towards our environment and society.

Planzer endeavours to meet the highest standards in relation to corporate ethics and integrity. The Code of Conduct is intended to reflect this, and serves to protect and promote our company, which enjoys a first-class, enduring reputation in the market. The rules of conduct are based on our business principles, and therefore on corporate responsibility, mutual respect and far-sighted resolve. We wish to continue adhering to the rules of conduct, based on our own responsibility as entrepreneurs.

At the same time, for the benefit of the whole Planzer group, we also apply our principles of conduct to all our staff's activities. This is achieved by drawing on the entrepreneurial spirit and sense of responsibility of the individual employees, and also by applying the directives of the directors and senior management team with the corresponding controls.

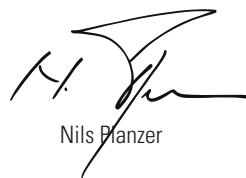
In this way we uphold our values (*see page 7*), the good reputation and leading market position of Planzer, and ensure the future continuity of sustainable business practice.

The principles of conduct at Planzer serve as the basis for our business ethics, and they are therefore the gauge for our daily work. They motivate us to do our best every day.

The directors and managers support our staff by acting and living in accordance with these principles.

In this spirit we all strive to set a good example and cultivate open interaction, based on mutual trust, both internally and externally. If there is any uncertainty about how a person should behave in a certain situation, the line managers, personnel department, compliance officers and directors offer advice and assistance.

We ask our staff to fully understand and comply with our Code of Conduct. We thank you all for helping to meet our high standards of conduct in the interest of the whole company.



Nils Planzer



Planzer

Planzer

OUR VALUES

- In our extended family we are all on first-name terms – everyone from apprentices to the managing director.
- We greet each other, help each other, treat each other with respect, trust one another and behave with decency, are loyal and openly express what we think and feel.
- We spend a lot of time at the workplace – to a certain extent the workplace becomes a living environment. Together we make this environment as pleasant and safe as possible.
- We encourage and support our staff, in order to achieve a consistently high level of performance together.
- We shape our future together. We are open to new things and continue to develop. As a result we feel at ease and enjoy our work as a way to experience happiness and also have fun while we are here.
- We want to receive constructive criticism, from apprentices to managers and vice versa, because this is the way to continually progress and improve.
- We care about and take care of everything: other human beings, the environment, our vehicles, tools, and resources.
 - Our customers and suppliers are our friends – they take centre stage and the focus is on them. We are happy if they are happy. That's what we call quality.

THE WAY WE ACT

➤ **enterprising:**

With clearly-defined structures and a high level of professionalism, we concentrate on our core services of transportation, warehouse logistics and freight forwarding. These secure our economic livelihood.

➤ **close-knit:**

As a family business we foster loyalty, trust, personal relationships, and individual responsibility. We focus on the customers' satisfaction – and not merely on ourselves.

➤ **versatile:**

Being versatile also means choosing the right route. We seek not only the fastest route, but the most intelligent one. This also includes the conservation of our environment and its resources – because we cannot move without them.

➤ **far-sighted:**

With the courage to take on new challenges and a sense for what is feasible, we open up new entrepreneurial vistas. We take care to ensure comprehensive safety. And each year we train more than 100 apprentices – they are a vital part of our future within society.

➤ **legally and ethically impeccable:**

Not only do we comply with the legal regulations, we go beyond this and ensure that we always act ethically and with integrity, whilst protecting the rights of the individual. We expect such behaviour from our own staff and our business partners.

BUSINESS PRINCIPLES

We think and act with a sense of our own responsibility, honestly and in an entrepreneurial way.

Whether director, manager or employee, we follow these principles in every regard:

- » We do nothing that could harm the reputation of Planzer.
- » We act legally and loyally.
- » We put the interests of the company above our personal interests.

LAWS AND REGULATIONS

We are a part of our society. We therefore observe its laws.

We comply with all the laws and regulations that relate to our business activities or are relevant to our provision of services. Our activities must not contravene these regulations. We achieve this through our open error management culture and transparent communication.

Every single individual is personally responsible to ensure that all the relevant regulations are obeyed. This also applies to regulatory direc-

tives and business practices that go beyond the statutory minimum.

We comply not only with external rules, but also internal ones. Therefore we also require adherence to the rules applying to our organisation and responsibilities.

PLANZER QUALITY MANAGEMENT (PQM)

PQM ensures the quality of our services, creates added value, and helps our customers gain a competitive advantage.

PQM is aligned to the customers' requirements. In addition to PQM, and as a form of self-supervision, Planzer participates in the EcoVadis programme. This participation is continually developed in order to achieve the degree of detail that is demanded today.

PQM complies with the audits of major companies and is regularly approved and accepted by them as a quality management system that meets ISO standards.

In the ongoing PQM processes, Planzer constantly strives to ensure that PQM is not merely seen as a static information and document management system. It is important that our employees regard PQM as an active quality assurance process and constantly support, or even improve it. They receive regular training and audits. The audits meet the criteria of the relevant guidelines in all the departments and at all sites covered by the PQM process. Equally important is the commen-

cement of systematic compliance training at the appropriate levels. Planzer is confident that it can provide a dynamic compliance system that is appropriate for the company as part of a comprehensive quality management.

This is based on the existing PQM structures, with corresponding ongoing amendments and improvements as well as a consolidation of existing documents and processes. Planzer endeavours to achieve and implement practical, comprehensive quality standards in a streamlined and efficient way, at all levels throughout the whole of the Planzer group.

HEALTH AND SAFETY

Health and safety are essential for survival, so we take care.

We are responsible for the safety of all our staff and do everything to ensure that it is guaranteed. As managers we undertake to guide, train and supervise our employees, whenever necessary.

We observe the current guidelines of SUVA (Swiss accident insurance) and the other relevant safety regulations, especially those relating to dangerous goods, foods and pharmaceutical products, as well as the appropriate national and international standards.

The quality of the health and safety of our employees is also ensured through PQM. The Planzer branches are regularly audited by the relevant PQM departments.

We train our staff initially, with further training on an ongoing basis. Special emphasis is placed on safety at the workplace, and a long-term health management. With special courses on various health-related topics such as nutrition, posture and sports, we encourage our employees to stay healthy during and after their working day.

OUR ENVIRONMENT

A sound environment is vital for our economic future, so we look after it.

We make extensive contributions to the long-term protection of our environment. Our unique form of intermodal transport significantly reduces our CO₂ emissions. We transport over 60% of all our goods by rail.

We also maintain a modern fleet of vehicles, and train our drivers in the ecological use of their vehicles. Our new buildings incorporate environmentally friendly building techniques. We encourage our employees to

take on responsibility and support them in actively contributing to the preservation of our environment.



CHILD LABOUR

Child labour violates basic human rights. Therefore we condemn it unequivocally.

All forms of child exploitation are forbidden. We base our clear position on child labour on the ILO agreement, United Nations conventions and

national laws. The rights of young workers are defined by Swiss Labour Law and its ordinances, which we adhere to uncompromisingly.

FAIR COMPETITION

We support fair competition and believe in the free market economy based on competition – we condemn arrangements that improperly restrict competition.

Competition ensures that our work will be rewarded in the long term, and that our own company continues to progress. If we collude with competitors against clients, we would destroy the trust that has been steadily built up with the clients over many years. This short-term thinking would cause immediate and often irreparable harm to the company.

Free competition is protected and promoted by Competition Law. Therefore our actions must unconditionally comply with all the provisions for the protection of competition (antitrust laws). At Planzer the following minimum standards apply:

- We do not make any kind of agreements or arrangements with competitors to fix prices, or apportion markets, quantities, areas or customers.
- We do not exchange any information with competitors about current or future prices, profit margins, costs, tenders, market share, supply and distribution practices, sales terms, specific customers or business partners.

- We do not make arrangements with our customers for any resale of our products at certain prices, and we do not undertake any actions which would unfairly favour one customer over another competing customer.
- Our employees are, of course, free to come together and form a union of their choice. If our employees are considering attending meetings, we request that they only attend gatherings organised by reputable and recognised industry associations, and that you agree any participation or active role in the association with your manager, the Executive Board or the Compliance Officer in advance.

BRIBERY AND CORRUPTION

Bribery or corruption contravene our business ethics. We therefore penalise such practices.

We do not accept any personal or inappropriate financial or other benefits (e.g. presents, services or invitations) which go beyond the limits of usual business hospitality. Nor do we offer such benefits to third parties.

Furthermore, we do not do this directly or indirectly via third parties in order to secure a business relationship with a third party or to influence their decision-making.

If we find we are being drawn into such activities, we shall distance ourselves in the interest of integrity and immediately report the case to our directors. The same applies if an employee has some doubt about whether these principles are being breached.

CONFIDENTIAL CORPORATE INFORMATION

Confidential information is a competitive advantage, so we protect it.

Information is confidential if it directly or indirectly concerns our business activities and is unpublished.

This includes business secrets, customer data, ideas and concepts, and other types of information related to business projects which is only intended for Planzer.

We keep such information secret and apply maximum care in handling it, unless the directors expressly consent to its disclosure.

If customers disclose business secrets to us in the course of our business relationship, we treat these as though they were internal company information.





INFORMATION SYSTEMS AND PROTECTION OF PRIVACY

We use our information systems in a professional way and safeguard the privacy of our staff.

Our information systems provide efficient and professional work at Planzer and for Planzer. They should be used for business purposes, always in a manner that does not violate the rights and interests of the company and complies with the directives issued by Planzer.

Every e-mail can be regarded as statement made by Planzer. We should therefore ensure that no information is transmitted in this way which is commercially sensitive or controversial, or which could have undesirable contractual consequences, or any other legal consequences for Planzer. Data which are produced using the information systems of Planzer and stored on them, are deemed to be the property of Planzer. Our employees are responsible for the orderly administration of their data and files. Planzer reserves the right to access these data at any time, while complying with the provisions of the law.

Although we value mutual respect and the protection of privacy, our employees may not invoke this protection if it contravenes applicable laws when using Planzer's information systems for the purpose of communication. Within the applicable laws, Planzer is entitled to monitor, access, use, and where necessary, disclose the use of the Internet and e-mail correspondence.

REPORTING INFRINGEMENTS

Every individual must be free to report infringements.

Infringements against the law, against this Code of Conduct, or against corporate principles should be reported.

The same applies if employees are being pressured to infringe against our principles, either within the company or from the outside.

These matters should be addressed to the line manager, a director, or the compliance officer. The director of quality management, Willi Gärtner, is the Compliance Officer designated by the Board of Directors.

Confidentiality shall be observed as far as possible. Retaliatory measures against those who report infringements will not be tolerated by our company.

