



**C. Steinweg Group**

# Code of Conduct





## Introduction by the CEO

C. Steinweg Group enjoys a noteworthy reputation for pursuing a commercial approach built on honesty and integrity, taking account of the interests of all those who may be affected by its activities. Our reputation is of inestimable value – just as valuable, in fact, as the quality of the staff we employ and services we provide. Our primary aim is to be a successful company. That means investing in growth and balancing short- and long-term interests. But it also means considering the needs of customers, employees, shareholders, business partners and indeed the world in which we live.

To be successful, we must all maintain the highest standards of conduct. These standards are defined in the general principles enshrined in this Code. In October 2023 the C. Steinweg Group's Board of Directors updated and reaffirmed these general principles. They will be used as a basis for more detailed guidelines targeted at individual countries and companies in our Group. However, the standards contained in those detailed guidelines will not be less strict than those set down in this Code.

We want this Code of Conduct to be more than simply a collection of fine words. It must play a practical role in our day-to-day business; we all need to adhere both to its meaning and its spirit.

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## 1 Vision and mission

C. Steinweg Group is committed to its values and motivating principles of providing a safe and secure work environment for employees and business partners. We stand for quality and reliability. We always strive for lasting relationships with both customers and employees. Together, we are committed to identify, understand, manage and report on environmental impacts, risks and opportunities. Not only for the benefit of employees and partners, but also broader communities in countless possible ways.

C. Steinweg Group is one of the world leaders in commodity handling, forwarding, and warehousing. We strive for the very highest level of safety and sustainability. We are active in more than 50 countries worldwide and are thus able to provide an essential logistics connection for our customers.



## 2 Culture and core values

The culture within our company is the basis for our success. Our vision is reinforced by our core values:

### 2.1 Customer orientation:

The customer is central and gives us the right to exist. Together with our customers, we always look for the best solutions to meet the maximum quality of service.

### 2.2 Social orientation:

Our employees have been making Steinweg since 1847. They have brought us to where we are and can take us into our future. We work together and are open and direct with each other. We share successes with each other, but also learn from our mistakes, which makes us stronger. We try to put people first, to give them room to develop, and to offer them the best means to achieve their and our goals.

### 2.3 Decisiveness:

We roll up our sleeves, are goal-oriented and innovative. We make individual and collective decisions based on common sense, knowledge, and experience. We pay attention to quality requirements but try hard not to make matters unnecessarily complex.

### 2.4 Passion:

We are proud of our history, our idiosyncrasy, our people, their innovative solutions and achievements. We show passion and commitment, take responsibility, and go the extra mile when necessary. Our passion makes the difference, ensuring unconditional commitment and dedication. We do that together, together with our colleagues, for our C. Steinweg Group.



### 3 Explaining the Code of Conduct

This Code applies to all C. Steinweg Group, its affiliates, and its employees world-wide. Any non-adherence to this Code requires instant notification to the Executive Board.

The Executive Board will not hold management accountable for any loss of business resulting from compliance with this Code of Conduct, and will see to it that no employee suffers as a consequence of reporting a breach or suspected breach of this Code.

Employees are urged to report suspected irregularities internally to their direct manager or, if they consider reporting to their manager inappropriate, to their superior manager, or, if they consider reporting to the superior manager inappropriate, to the Group Compliance Manager at [compliance@nl.steinweg.com](mailto:compliance@nl.steinweg.com) or use the speak-up channel as mentioned in the Whistle-blower Policy.

#### 3.1 Standards of behavior

Our approach is based on honesty, integrity, openness, and respect for human rights and for the interests of our employees. We are committed to upholding the legitimate interests of anyone with whom we are doing business.

Steinweg Group does not tolerate harassment or discrimination including behavior, comments, email messages or other conduct that contributes to an objectively intimidating or offensive environment. Slurs based on race, gender, religion, sexual orientation, gender identity, or any other conduct that encourage or fosters an offensive work environment are unacceptable and will be dealt with seriously.

#### 3.2 Complying with the law

C. Steinweg Group of companies and employees must comply with the laws and regulations of the countries in which they are operating and with applicable international laws and regulations. Also, relevant stakeholders while working with or on behalf of Steinweg are expected to abide by all relevant or applicable regulations from all government agencies that apply to Steinweg within the relevant jurisdiction, including but not limited to any anti-corruption regulation, antitrust law or any other law or regulation, local or national, applicable to our industry within that jurisdiction.

#### 3.3 Employees

C. Steinweg Group is committed to encouraging diversity among its employees, in a working environment where people trust and respect one another and where everyone has a sense of responsibility for our results and reputation.

Within the Group we believe that being accountable is an important pillar for effectiveness and for being decisive. Individual accountability within the business helps to promote and embed personal ownership.



Taking ownership of our own area of action and being committed to our tasks is the best way to develop oneself and others. This is the path to social responsibility and sustainability, where every employee counts as an ethical agent of the whole organization.

We will only recruit, hire, and encourage staff based on the capacities and skills required for the job that needs to be done. We want to create and maintain safe and healthy working conditions for all employees, contractors and third parties at our operations.

We reject all forms of forced or child labour. We want to develop and enhance the skills and capacities of all our employees, in partnership with them. We respect the worth and dignity of the individual and the right of our employees to join trade unions. We will ensure good communications with our staff through information and consultation procedures at both company and job level.

### **3.4 Shareholders**

C. Steinweg Group will conduct its business in line with internationally accepted principles of sound business management. We will give all shareholders prompt, regular and reliable information on our activities, structure, financial position, and results.

### **3.5 Business partners**

C. Steinweg Group wishes to pursue relationships with its suppliers, customers and business partners that will benefit all parties. We expect our business partners to apply codes of conduct that are consistent with our own which implies assuming responsibility for the impacts of everyone's action on the supply chain and associated activities in an ethical and compliant manner.

### **3.6 Involvement with the community**

C. Steinweg Group wants to be a reliable member of society and, as an integral part of that society, to meet its social responsibilities and obligations to the communities in which it is active.

### **3.7 Public role**

C. Steinweg Group of companies will be encouraged to promote and defend their legitimate commercial interests. Steinweg will work with governments and other agencies, directly and through branch organisations, to draft legislation and regulations in areas that could affect its legitimate commercial interests. Steinweg has no political affiliations and makes no contributions to groups promoting political interests.



### 3.8 The environment

C. Steinweg Group will continue to improve the way it manages the environmental impact of its activities and attempt to develop sustainable operations in the longer term. It will work with its partners to promote environmental protection, increase insight into environmental issues and disseminate good working practices.

### 3.9 Innovation

Our teams are teams that dare to embrace change. We are open-minded and love challenges while adapting easily to new demands with a hands-on mentality. This is about being curious and eager to learn new paths and possibilities to reach a higher level of performance.

When carrying out innovation-based research to meet our customers' needs, we will respect the concerns of our customers and of society. We will base our work on sound scientific research and apply strict quality standards.

### 3.10 Competition

C. Steinweg Group believes in strong yet fair competition and supports the development of appropriate legislation. C. Steinweg Group of companies and its employees will abide by the principles of fair competition and all national and international competition laws and regulations.

### 3.11 Commercial integrity

C. Steinweg Group will promote strongly clear rules of rightness in its commercial operations as a standard behavior for its employees, giving our business the best possible transparency that can be achieved. Steinweg financial accounts and supporting documents will fairly describe and reflect the nature of its commercial transactions.

### 3.12 Anti-Money Laundering

C. Steinweg Group is committed not to cooperate, directly or indirectly, with money laundering activities. Steinweg maintains a zero-tolerance policy towards money laundering and takes active steps to prevent financial crime and the purposeful or accidental facilitation of criminal behavior.





### **3.13 Anti-Bribery and Anti-Corruption**

C. Steinweg Group is committed to the prevention of bribery and corruption. Compliance with anti-bribery and corruption laws is compulsory. Steinweg is committed to maintain the highest ethical standards and vigorously enforces the integrity of its business practices wherever it operates throughout the world.

### **3.14 Sanctions compliance**

In every country in which we do business, certain laws and regulations govern sanctions and trade embargoes. Steinweg commits itself to adherence with relevant sanctions and regulations. To manage our sanctions risk exposure and ensure compliance, we implement controls and processes including screening and due diligence on our counterparties involved in transactions into which we enter.

### **3.15 Respect and confidentiality**

C. Steinweg Group expects its employees to handle communications responsibly. Steinweg's values guide the way we communicate internally and externally, whether by telephone, letter, e-mail, social media or otherwise. Employees are expected to protect the company's reputation and treat sensitive and classified information with strict confidentiality.

### **3.16 Personal data and privacy**

C. Steinweg Group respects any individual's general right of privacy of their personal data and adheres to all applicable local laws on the use of personal data. We only use personal data if we are authorized to do so and for legitimate business reasons. Steinweg is committed to securing customer, suppliers and personal data against (personal) data breaches.

### **3.17 Conflicts of interest**

All C. Steinweg Group's employees will be expected to refrain from personal activities and financial interests which could conflict with their responsibilities to the company. Steinweg employees may not use their position to accrue benefits for themselves.

The Executive Board expects company employees to notify it or the senior management of all actual or suspected Code of Conduct infringements they may encounter.

Measures are in place to enable employees to report irregularities in confidence; employees will not be disadvantaged by submitting such a report.



### **3.18 Compliance - Supervision – Reporting**

Compliance with this Code of Conduct is a key requirement for our success as a company. The Executive Board is responsible for ensuring that all employees are familiar with the Code, understand why it is needed and why they need to abide by it.

Day-to-day responsibility for ensuring compliance with this Code of Conduct is delegated to the senior management of each region and operating company. They are responsible for its application, and where necessary in the form of detailed guidelines tailored to local needs.

A statement confirming that this Code of Conduct has been upheld will be published and audited annually. Compliance with the Code will be evaluated by the Executive Board.

### **3.19 Whistleblowing**

C. Steinweg Group has a Whistle-blower Policy in place. The Whistle-blower Policy applies to all C. Steinweg Group entities and its employees world-wide. This policy is an extension of the Code of Conduct. Steinweg does not tolerate illegal, corrupt, or other improper conduct by its staff or service providers, nor the taking of reprisals against those who come forward to disclose such conduct.

Steinweg has set up, for this purpose, a channel where reports can be received in which the confidentiality of the identity of the reporter and of the third parties involved is guaranteed and which is only accessible to authorized Steinweg's employees.

If you have any concerns about a situation, you can find the reporting channel in the Whistle-blower Policy.