



Code of Conduct

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1. Introduction and objective

The international activities of Salloum Logistics require compliance with a wide range of social, political and legal conditions. Violations of these framework conditions can cause considerable financial disadvantages for the company and cause lasting damage to the reputation of the group.

The business activities of Salloum Logistics GmbH and its subsidiaries are characterised by responsible action and the highest ethical principles. In order to continue on our successful course, we must maintain the trust placed in us by our customers, business partners and employees (the masculine form used for better readability always refers to all genders).

This Code of Conduct is based on ten principles of the Global Compact and contains all the specifications on those central topics in which compliant behaviour is expected. It also describes how to deal with violations. The Code of Conduct set out here forms the basis for morally, ethically and legally impeccable behaviour throughout the company and is intended to support our employees in the responsible performance of their functions. Both the management and each individual employee of the company are clearly committed to adhering to the principles described in the Code of Conduct.

2. Scope of application

The Code of Conduct applies to all managers and employees of Salloum Logistics without exception. Furthermore, it is in the interest of the group that the subsidiaries also bring the Code of Conduct to the attention of their key business partners (customers, suppliers, consultants, etc.).

We require our business partners to behave with integrity and in accordance with the law in the context of our business relationships.

3. Compliance and implementation responsibility

3.1. In general

In principle, each individual employee is responsible for compliance with and implementation of the Code of Conduct. Managers are to set an example to employees in this regard. When interpreting the Code of Conduct, employees must also be guided by "common sense" and question whether, based on reasonable ethical and moral standards, a specific course of action could give rise to criticism. In doing so, country-specific standards and customs must be taken into account. There is no discretionary power in the case of legal regulations.

All employees and sub-contractors are required to report verifiable or suspected violations of laws, the Code of Conduct or other internal guidelines and regulations (see also section 5 "Reporting misconduct").

3.2. Compliance Officer

The company management is responsible for ensuring the establishment, maintenance, evaluation and improvement of the compliance management system. In addition, the company management must define the internal responsibilities and powers and appoint a Compliance Officer.

The Compliance Officer is responsible for:

- the administration of the Code of Conduct as well as related guidelines (updating)
- answering questions of interpretation
- reporting to the management
- communicating and training employees on the Code of Conduct.

In addition to the direct supervisors, the Compliance Officer is the contact person for all employees if decision-making aids are needed for the correct procedure in certain situations.

4. Code of Conduct

4.1. Compliance with laws and other regulations

All business actions and decisions must strictly comply with the applicable laws and other external and Group-internal regulations. The prohibition of accepting and granting advantages, extortion, bribery and corruption is taken very seriously. All employees are required to inform themselves comprehensively about the laws, other regulations and internal guidelines and rules applicable to their respective areas of responsibility and, in cases of doubt, to contact the responsible bodies (direct superiors, compliance officers). In addition, freedom of association and the effective recognition of the right to collective bargaining must be upheld from a company perspective.

Example:

An instruction from a supervisor is not a justification to violate laws and our policies. Report such practices to the contact points at the end of this Code of Conduct.

You can avoid unpleasant situations in advance by asking yourself the following questions in your daily work:

- Are my actions legal and in line with Salloum Logistics' policies?
- Can I in good conscience take responsibility for my actions or what would others say about them?
- How would I react if my behaviour was made public?

4.2. Fair competition

Transparent and fair behaviour in the market ensures the competitiveness of Salloum Logistics in its entirety in the long term. Any restriction of free competition and violations of competition and antitrust regulations are not compatible with the corporate philosophy and culture as well as the self-image of Salloum Logistics.

In the course of their business activities, all employees must comply with the following conduct guidelines in particular:

- No unfair business practices may be used or pressure exerted on business partners.
- No agreements or arrangements may be made to submit bogus offers.
- Salloum Logistics employees are prohibited from discussing confidential matters such as prices, costs or similar confidential information in discussions and contacts with competitors.

Example:

You are at an industry event and have a conversation with an employee of a competitor. In the course of this conversation you notice that he wants to make an agreement with you regarding pricing in tenders.

Make it very clear to your interlocutor that you are not interested in such unfair business practices. Subsequently, inform your superior.

4.3. Money laundering

Various countries, including the countries of the European Union, have enacted laws against money laundering. All employees are prohibited from taking actions that violate money laundering regulations, either on their own or in cooperation with third parties. Money laundering is understood to mean, in particular, the smuggling (e.g. by means of exchange or transfer) of funds or other assets originating from criminal offences into the legal financial and economic cycle

4.4. Compliance with human rights, prohibition of discrimination

Based on the UN Charter and the European Convention on Human Rights, international human rights are considered fundamental values to be respected, upheld and protected by all employees.

Discriminatory behaviour such as on the basis of age, disabilities, origin, gender, political stance, race, religion or sexual orientation is just as little tolerated as sexual harassment in any form. In this context, discriminatory tendencies in employment and occupation will also not be tolerated under any circumstances. These principles also apply to conduct towards external partners. It must be ensured that there is no complicity in human rights violations. Forced labour of any kind is of course prohibited. Salloum Logistics also supports the abolition of child labour.

Example:

A colleague confides in me during lunch that a colleague is making lewd gestures towards her and telling tasteless jokes about her in the department. She feels sexually harassed by him.

What should I do?

Address your colleague - assuming the person concerned agrees - that he/she has not behaved respectfully. If the disrespectful behaviour is repeated, contact one of the possible contact points at the end of this Code of Conduct. Discrimination, in any form, will not be tolerated!

4.5. Conflicting interests

In the course of business, employees may find themselves in situations where their personal or economic interests conflict or may conflict with the interests of the Group. All employees are expected to deal transparently with such conflicts of interest. All employees are obliged to disclose actual or potential conflicts of interest immediately and in full to their respective supervisor without being asked to do so. In particular, conflicts of interest may arise in connection with secondary employment. Economic engagement with competitors or business partners of Salloum Logistics - in particular with customers - is not permitted. Invitations, gifts and other benefits which exceed the scope of appropriate and customary business practice and which could call into question the objectivity and independence of the company are avoided. When making purchasing, personnel or recruitment decisions, a transparent and appropriate selection is made according to objective criteria and not according to personal interests. Conflicts of interest can also arise due to family relationships of employees who are employed in the same department. Such family relationships must therefore be disclosed to the supervisor.

Examples:

In my company an additional employee is to be taken on for scheduling. My son has completed his training and is now looking for employment. I know the head of the scheduling department very well and he also owes me a favour. I recommend my son to him as a new employee.

The purchasing manager meets with several suppliers to negotiate purchasing conditions. Supplier A promises the purchasing manager a purchasing discount for his next private purchase from him. The purchasing manager does not decide on the supplier with the best conditions, but on supplier A.

What should I do?

Make sure that your decision is not influenced by your personal advantage. Decisions in your everyday professional life should be made exclusively on the basis of objective and comprehensible criteria. If conflicts of interest arise, they should be disclosed immediately to your superior.

4.6. Dealing with company information/confidentiality

Confidential information of any kind obtained in the course of professional activities, which includes information outside the scope of one's own activities, may neither be used for the pursuit of one's own interests nor made accessible for the use of the interests of third parties. It must be ensured that company information of any kind is always kept secure. If such information must be taken outside the company for official reasons, it must be secured against inspection or access by third parties. Strict confidentiality must be maintained with regard to all company and business secrets as well as topics relevant to the company. Information from which company and business secrets can be derived must also be treated confidentially. The obligation to maintain confidentiality shall also apply after termination of the employment relationship. In addition, the relevant confidentiality provisions of the respective employment contracts shall apply.

4.7. Working time and remuneration

The respective locally applicable laws for the determination and observance of working hours (incl. overtime) and scheduled days off must be strictly adhered to. This also applies to compliance with legal requirements regarding wages and salaries, overtime regulations, wage deductions, performance-related remuneration and other remuneration.

4.8. Occupational safety

The topic of occupational safety occupies a special position. The applicable occupational health and safety regulations must be complied with without exception. Sources of danger must be identified immediately and appropriate preventive measures taken. Managers have an important role model function in this respect. If you receive instructions from your superior that do not comply with the quality and safety standards, this must be reported to the possible contact points at the end of this Code of Conduct.

4.9. Environmental protection

All employees undertake to operate sustainably and to comply with applicable laws concerning environmental protection. The company is aware of its responsibility and aligns its processes and decisions accordingly, taking into account aspects of economic efficiency. The use of natural resources such as energy, raw materials or materials should be kept as low as possible. Damage to the environment should be avoided as far as possible in advance (despite an incomplete scientific basis). In addition, self-initiative to promote greater environmental awareness as well as the development and dissemination of environmentally friendly technologies are important components of the corporate strategy.

4.10. Data protection

The protection of customer-related data is just as important as the protection of employee and business partner data. Careful handling of this data and compliance with the relevant legal provisions is practised by all managers and employees. In particular, Salloum Logistics is committed to compliance with the General Data Protection Regulation (GDPR) and the associated obligations.

Example:

The other day, when I wanted to copy some things, I found a list with employee data and information on wages and salaries at the copier. I am worried that someone other than the HR department might have seen this information.

What should I do?

Only authorised persons are allowed to access personal and company data for business purposes! Make sure that sensitive information does not fall into unauthorised hands. Therefore, report your find to the relevant department or your supervisor.

5. Reporting misconduct

Sallum Logistics employees and sub-contractors may discover violations of the Code of Conduct, other internal policies and regulations or legal requirements. If employees identify such misconduct, they are required to report it immediately.

The following options are available for this purpose:

- Information to the direct superior
- Information to the Compliance Officer (A. Karioh, +49 163 3630303, karioh@salloum.eu)
- Information to the management (W. Salloum, +49 203 34859610, w.salloum@salloum.eu).

All reports received will be carefully investigated, may be made anonymously and will be treated confidentially if requested. In order to promote open and trustful communication, it is expressly stated that employees who report identified violations of laws, the Code of Conduct or other internal guidelines and regulations will in no way suffer negative consequences of any kind. This applies equally to other persons who contribute important information to the investigation of such misconduct. However, Salloum Logistics expressly reserves the right to take disciplinary action against employees who intentionally or through gross negligence make false allegations.

Walid Salloum

CEO

Azzadine Karioh

Compliance Officer