

CODE OF CONDUCT

Basel, June 2018

www.feagint.ch

Foreword

As a medium-sized and independent Swiss family business since its founding in 1958, FEAG International Freight Forwarders Ltd. has always set for itself the objective of offering customers outstanding transport and logistics services.

In this Code of Conduct you will find the values and guidelines for which FEAG International Freight Forwarders Ltd. advocates. They are primarily based on the universally recognised principles of the Global Compact.

All employees, as are also the members of the Executive Board and the Administrative Board of FEAG International Freight Forwarders Ltd., are bound by the provisions of this Code of Conduct. It sets out the values, principles and procedures that determine the business activities of FEAG International Freight Forwarders Ltd. The objectives of the enterprise management are adherence to ethical norms and the creation of a work environment which promotes integrity, respect and fair behaviour. A strictly legitimate and principled business policy serves the long-term interests of the enterprise.

Compliance with legislation and other regulations at home and abroad

In all business decisions and actions, FEAG International Freight Forwarders Ltd. endeavours to comply with the applicable legislation and other relevant regulations at home and abroad. Integrity and sincerity promote fair competition, also in relation to our customers and suppliers.

Commitment of the management

FEAG International Freight Forwarders Ltd. sees itself as obliged to act economically, socially and environmentally-consciously. FEAG International Freight Forwarders Ltd. therefore strives to conduct its business in a competent and ethical manner and to protect fair competition in all of the markets in which it operates by complying with applicable legislation on anti-trust prohibitions, competition and restrictions of competition. Illegal price agreements will not be accepted by us - accordingly, we expect the same from our business partners and suppliers. Unfair advantages towards customers, suppliers or competitors are to be avoided.

Environmental Protection

With the use of energy-efficient and environmentally friendly technologies we minimise the environmental impact of our activities to the greatest extent possible.

Freedom of Association

FEAG International Freight Forwarders Ltd. respects the right of association and the right to collective bargaining.

Conflicts of Interest

FEAG International Freight Forwarders Ltd. expects loyalty towards the enterprise from its employees.

All employees must avoid situations in which their personal or financial interests conflict with those of FEAG International Freight Forwarders Ltd. Accordingly, it is particularly prohibited to participate with competitors, suppliers or customers or to enter into business relationships with them in the private sphere, insofar as these could lead to a conflict of interest. The interests of FEAG International Freight Forwarders Ltd. must not be impaired by conflict situations.

Such conflicts of interest may arise in a myriad of situations: thus, an employee may not accept benefits - in whatever form - through which, from a reasonable standpoint, it can be surmised that these benefits may be considered to influence business decisions by, or transactions of, FEAG International Freight Forwarders Ltd. Invitations must be within the bounds of customary hospitality. By virtue of their position in FEAG International Freight Forwarders Ltd., employees should not acquire personal advantages directly and / or indirectly through their access to confidential information. All employees have the duty to promote the legitimate interests of FEAG International Freight Forwarders Ltd. as far as possible. Every competitive situation with the enterprise is to be avoided.

Every actual or potential conflict of interest must be reported to and discussed with the relevant supervisor.

Prohibition of Corruption

We strictly reject corruption and bribery. Behaviours whereby business is done by unfair means will not be tolerated. Donations to social institutions and the support of clubs (sports / culture) is permitted, in so far as this is voluntary and done without expectation of a consideration. Invitations and gifts may be accepted or granted provided they do not arouse the impression of acquiring undue influence and are not made in anticipation of a consideration. In addition, we also abstain from any form of money laundering activity.

Handling Assets

All employees of FEAG International Freight Forwarders Ltd. are responsible for the orderly and careful handling of the property of the enterprise. Every employee is obliged to protect the property of FEAG International Freight Forwarders Ltd. against loss, damage, misuse, theft, embezzlement or destruction. Every employee has an obligation to inform his supervisor without delay of any usage of assets that is contrary to the preceding requirement.

Fair Working Conditions

All employees of FEAG International Freight Forwarders Ltd. are called upon to ensure there exists a safe and healthy working environment. Therefore, safety regulations and practices must be strictly adhered to.

We support the protection of internationally proclaimed human rights, including minimum wage and working hours. We condemn any kind of child and forced labour.

As a socially responsible employer, FEAG International Freight Forwarders Ltd. regards its employees as being of high value. It demands great dedication from its employees and, in return, shares the business success with them. The personnel policy of FEAG International Freight Forwarders Ltd. contributes to offering each employee the possibility of professional and personal development. Open exchange of views, criticism and ideas are encouraged.

FEAG International Freight Forwarders Ltd. condemns unlawful discrimination or harassment of any kind. Equal treatment for each individual, irrespective of sex, origin, nationality, religion, age, political background or disability, is guaranteed.

Vocational and Advanced Training

By means of their basic vocational training with us, we enable young people to successfully enter the world of work. In this way we secure our own requirement for well-trained employees and, in addition, make a valuable contribution to sustainable development of the Swiss freight forwarding industry.

Learning does not end with the basic training. Constant change requires ongoing training. FEAG International Freight Forwarders Ltd. demands and promotes the continuous further education of its employees, be it by offering internal language courses or support in further education programs.

Dealing with Internal Knowledge

All employees of FEAG International Freight Forwarders Ltd. are obliged to ensure a fast and smooth exchange of information within the enterprise. Information must be passed on correctly and completely to the concerned areas unless exceptional interests, in particular, in regard to obligations of confidentiality, prevail. Relevant knowledge must not be unlawfully withheld, falsified or selectively passed on.

Dishonest reporting within the enterprise or to external organisations or persons is strictly prohibited. All annual financial statements and annual reports, business documents and accounting records of FEAG International Freight Forwarders Ltd. must accurately represent business-related matters and other transactions and comply with the statutory requirements as well as the accounting principles and internal accounting procedures of FEAG International Freight Forwarders Ltd.

Confidentiality and Data Protection

A large portion of the business information of FEAG International Freight Forwarders Ltd. is confidential or legally protected, ergo, there is a duty of confidentiality. This does not apply if publication of the information has been approved by FEAG International Freight Forwarders Ltd. or if it is mandatory due to statutory laws or regulations.

The duty to maintain secrecy relates in particular to intellectual property. This includes business secrets, as well as business and marketing plans, business papers, salary data and any other unpublished financial data and reports.

All personal information regarding employees, customers, business partners and suppliers as well as other third parties is used diligently in FEAG International Freight Forwarders Ltd. and handled confidentially in full compliance with data protection laws. The protection of this information must be heeded with the utmost care.

Implementation and monitoring

The rules contained in this Code of Conduct form a core element of the corporate culture of FEAG International Freight Forwarders Ltd. Consistent and uniform adherence to these principles is indispensable. Every employee is responsible for this.

Should an employee have concerns or complaints about the matters listed in this Code of Conduct, or knowledge of any breaches of the Codes of Conduct contained herein, he should promptly submit these to his supervisor for clarification. This can also be done anonymously or in a confidential manner. If the employee is not satisfied with the clarification he or she may then submit the concern or the complaint not only to his supervisor but also to the personnel department. FEAG International Freight Forwarders Ltd. does not permit reprisals for complaints brought forward in good faith under this Code of Conduct.

Responsibility

The described rules of conduct are binding for all employees of FEAG International Freight Forwarders Ltd. The administrative board, executive management and the entire management are committed to these and, through their role model function, render an important contribution to their compliance. Violations against this Code of Conduct can have consequences. In serious cases, this may lead to a termination of the employment relationship.