

Policy Ethics & Compliance

The deugro group is committed to the highest standards of ethical business conduct and integrity. These standards are mandatory and must be followed at all times by our employees and business partners.

We believe that any kind of unethical business conduct is incompatible with the principles of honest competition and a transparent and fair market.

Our commitment is lived top down from our CEO, Executive Board and Senior Management, and by each employee worldwide. Our policy is based upon, while not limited to, the United States Foreign Corrupt Practices Act (1977) and the UK Bribery Act (2010).

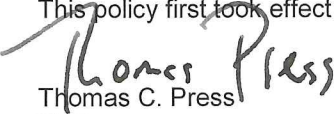
Our corporate Code of Ethics & Compliance and Anti-Corruption Compliance Policy have been implemented and built upon the following essential pillars of ethical conduct, which need to be complied with at all times:

- **Anti-corruption & improper payments.** The deugro group takes a zero-tolerance approach to corruption. Any kind of bribery or facilitation payment is strictly forbidden. Rules regarding the provision of gifts and hospitality, charitable donations, and political contributions complete our uncompromising approach towards improper payments.
- **Security.** Following the “trust but verify” principle, we monitor operations in our TMS (Transport Management System) electronically on a 24/7 basis. Addresses are matched against sanction list databases, ensuring that our business is protected at all times.
- **Business relations.** Ethical business practices are furthermore ensured by providing guidance for employees on essential topics such as competition, anti-trust, dealing with confidential information and trade controls.
- **Good workplace.** A first-class work environment is a key condition to economic success. The deugro group actively confronts and fights any kind of discrimination or harassment in the workplace. Prevention of conflict of interest situations is trained on at all levels. Specially trained Local Ethics Officers are available at all office locations in order to provide guidance, assistance, and a personal reporting channel for our employees.
- **Speaking up.** The deugro group provides different channels for stakeholders to raise concerns, regardless of whether an employee, business partner or third party. Any concern may be communicated to the Compliance team by email, an online form, phone call or in person, by contacting our Local Ethics Officers onsite or the Compliance Officer directly. By utilizing the online form, communications can be kept anonymous. Our non-retaliation policy guarantees that no one need worry about speaking up.
- **Transparency.** Every employee is required to sign the corporate Code of Ethics and Compliance and Anti-Corruption Compliance Policy. Regular circulars and updates regarding our compliance policy are communicated to our employees and all stakeholders in order to fulfil our strategy of “living compliance”.

Any breach of this policy will result in disciplinary action, which may lead to the immediate termination of an employment contract or business partner relationship. Additionally, any violation may also result in a criminal offence, possibly resulting in imprisonment and fines for the individual involved.

The deugro group does not work with business partners that are not supportive of and/or committed to our Code of Ethics & Compliance and working with the highest standards of business conduct.

This policy first took effect in December 2014 and is reviewed annually.


Thomas C. Press
CEO

Pfaeffikon SZ, December 2018