FleetLogistics

OUR
CODE OF CONDUCT

For Employees and Business Partners

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it’s time to move together

Welcome

to the Code of Conduct for the Fleet Logistics Group. This document serves as a foundational guide to our core values, principles, and expectations for behaviour within our organization. As a member of the Fleet Logistics team, you play a vital role in upholding our reputation and ensuring that we conduct our business with integrity and respect.

Our Code of Conduct is designed to promote a positive workplace culture where ethical behaviour is the norm. It outlines our commitment to legal compliance, fairness, and accountability, and provides clear guidelines for navigating various situations you may encounter in your professional environment. By adhering to these principles, we not only protect ourselves and our colleagues but also reinforce the trust our customers and stakeholders place in us.

We believe that a strong ethical foundation is essential for our success and sustainability. As we strive for excellence in our products and services, let us also strive to embody the values that define Fleet Logistics. Your commitment to this Code of Conduct is crucial in fostering an inclusive, responsible, and innovative organization.

Together, let's create a workplace where everyone feels valued, respected, and empowered to make a positive impact. Thank you for your dedication to maintaining the high standards that make Fleet Logistics a leader in our industry.

Steffen Schick
Chief Executive Officer
Fleet Logistics Group

2. Our behavioural principles

Integrity
Always act honestly and transparently in all interactions, both internally and externally.

Respect
Treat all colleagues, customers, and stakeholders with dignity and consideration, valuing diverse perspectives.

Collaboration
Foster teamwork by encouraging open communication and cooperative problem-solving across all levels.

Accountability
Take responsibility for your actions and decisions, and hold yourself and others accountable for upholding company standards.

Excellence
Strive for the highest quality in products, services, and performance, continually seeking improvement and innovation.

Fairness
Ensure equitable treatment in all business practices, including hiring, promotions, and conflict resolution.

Sustainability
Commit to environmentally and socially responsible practices that benefit both the company and the community.

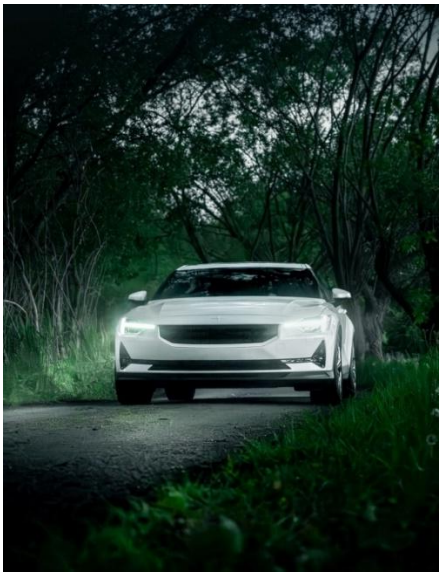
Empathy
Listen actively and show understanding for the feelings and perspectives of others, fostering a supportive work environment.

Professionalism
Maintain a high standard of conduct and appearance, representing the company positively in all situations.

Open-mindedness
Embrace new ideas and approaches, encouraging a culture of innovation and adaptability.

3. Our Responsibilities

- Compliance with Laws and Regulations
- Health and Safety
- Social Responsibility
- Conflict of Interest Management
- Confidentiality and Data Protection
- Fair Treatment
- Commitment to Quality



- **Compliance with Laws and Regulations**

We adhere to all applicable local, national, and international laws and regulations in all business practices.

Compliance is a fundamental aspect of our operations that safeguards our integrity, reputation, and long-term success. It is essential for every employee to familiarize themselves with the laws relevant to their roles and to remain updated on any changes that may affect our business. Understanding these regulations not only protects the company but also promotes ethical behaviour across all levels of the organization.

If you are unsure which laws apply, please contact Legal or Compliance.

Prohibition against forced labour

Forced labour is strictly prohibited in all operations, ensuring that all individuals work voluntarily and with full consent. We are committed to upholding human rights and will not tolerate any form of coercion, intimidation, or exploitation in the workplace.

Prohibition against child labour

Child labour is unequivocally prohibited in all areas of our operations, aligning with international labour standards.

Commitment to International Agreements

We adhere to international standards and recommendations related to ethical conduct.

Human Rights

We respect and promote human rights in our operations.

Environmental Responsibility

We are dedicated to minimizing our environmental impact and promoting sustainability.

Not with us!

Money laundering and funding of terrorism

Our organization is firmly committed to preventing money laundering and the funding of terrorism in all its operations. We strictly prohibit any involvement in activities that facilitate these crimes and require all employees and partners to adhere to relevant laws and regulations. To support this commitment, we will implement robust monitoring systems, conduct regular training, and ensure thorough due diligence in all transactions, fostering a culture of transparency and accountability throughout our organization.

Corruption, bribery and unfair business practices

What is corruption?
Corruption refers to the abuse of power for personal gain, typically involving unethical or illegal actions by individuals in positions of authority. It undermines trust, distorts markets, and can have severe social and economic consequences.

Example:
Vendors invite key employees to events to promote their services and attract more clients.

What is bribery?
Bribery is a specific form of corruption where someone offers, gives, receives, or solicits something of value to influence the actions of an official or other person in authority. It is often used to gain unfair advantages in business or politics.

> **Example:**
> An employee accepts a bribe to offer a reduced fee.

What are unfair business practices?
Unfair business practices refer to business practices that restrict competition, such as price fixing, collusion, and the establishment of monopolies. Antitrust law refers to legislation aimed at promoting fair competition and preventing monopolistic practices in the marketplace.

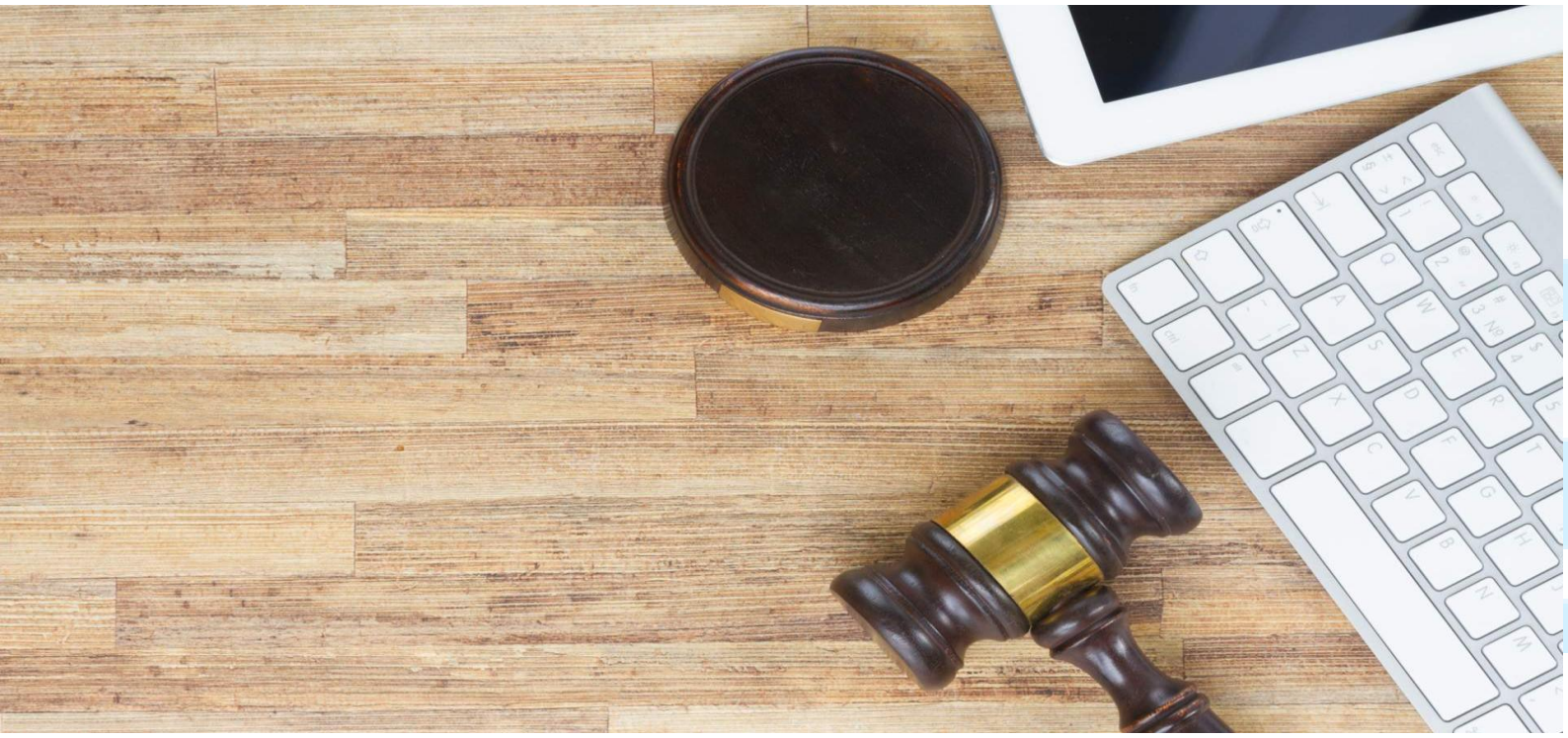
> **Example:**
> An employee visits the potential client to gather information about other bidders and competitors, specifically regarding their pricing.

Why It Is Not Accepted

Corruption, bribery and unfair business practices are not accepted because they undermine fairness, integrity, and trust in both public and private sectors. They create unequal playing fields, harm competition, and can lead to significant economic and social instability. Moreover, such practices violate ethical standards and legal regulations, damaging an organization's reputation and leading to severe penalties. Maintaining a culture of integrity is essential for fostering sustainable relationships and ensuring long-term success.

Consequences:

Disciplinary action / Fines and damages / Imprisonment



- **Health and Safety**

Our employees are our most valuable asset. Your health and safety are our top priority

Follow all health and safety guidelines to ensure a safe working environment for yourself and your colleagues. Adhering to these protocols is not only a legal obligation but also a shared responsibility that promotes the well-being of everyone in the workplace. Familiarize yourself with the safety procedures specific to your role and actively participate in training sessions, drills, and any updates to safety policies.

If you identify potential hazards or unsafe conditions, report them immediately to your supervisor or the designated safety officer. Your proactive approach can prevent accidents and contribute to a culture of safety. Additionally, feel encouraged to suggest improvements to existing safety practices, as your insights are valuable in enhancing our collective safety standards.

Remember that personal accountability plays a crucial role in maintaining a safe workplace. Use protective equipment as required, follow safe operating procedures, and be mindful of your surroundings. By prioritizing safety and looking out for one another, we can foster a work environment that is not only productive but also secure for all employees. Your commitment to these principles is essential in cultivating a culture of care and respect.

- **Social Responsibility**

Each employee has a role to play in promoting ethical behaviour and community engagement.

Engage in practices that contribute positively to the community and environment, reflecting the company's commitment to sustainability. This includes participating in supporting local organizations, and being mindful of our ecological footprint. By taking part in these activities, we not only strengthen our bonds with the community but also reinforce our values of compassion and integrity.

We encourage all employees to seek out opportunities for sustainable practices in their daily work. This may involve minimizing waste, conserving energy, and using resources efficiently. Small changes, such as recycling, reducing paper usage, and considering the environmental impact of our decisions, can collectively make a significant difference. Sharing your ideas for sustainability initiatives with your team can foster a culture of innovation and responsibility, allowing us to grow as a company and as responsible citizens.

Additionally, we recognize the importance of ethical sourcing and responsible business practices in our operations. Engage with vendors and partners who align with our values, and advocate for practices that support fair labour and environmental stewardship. By promoting social responsibility within our business relationships, we enhance our reputation and ensure that our impact on society and the planet is a positive one. Together, we can make a lasting difference that extends beyond our workplace.

- **Conflict of Interest Management**

Avoid situations where personal interests may conflict with the interests of the company, and disclose any potential conflicts. It is vital to recognize that even the appearance of a conflict can undermine trust and integrity within the organization. Employees should be vigilant in assessing their personal relationships, financial interests, and outside activities to ensure they do not interfere with their professional responsibilities. When in doubt, seek guidance from your supervisor or the appropriate compliance officer.

In cases where a potential conflict of interest arises, prompt disclosure is essential. This transparency allows for appropriate measures to be taken, ensuring that decisions are made in the best interest of the company and its stakeholders. Employees are encouraged to document any relevant relationships or transactions that could be perceived as conflicts and report them according to established protocols. By addressing potential conflicts proactively, we maintain a culture of accountability and trust.

Additionally, employees should refrain from engaging in any outside business activities that could detract from their commitment to the company or compete with its interests. This includes accepting gifts or favours from vendors or customers that could influence professional judgment. Upholding these standards not only protects the integrity of our operations but also fosters an environment where ethical decision-making is prioritized.

Together, we can uphold the values of our organization and ensure that personal interests do not compromise our collective goals.

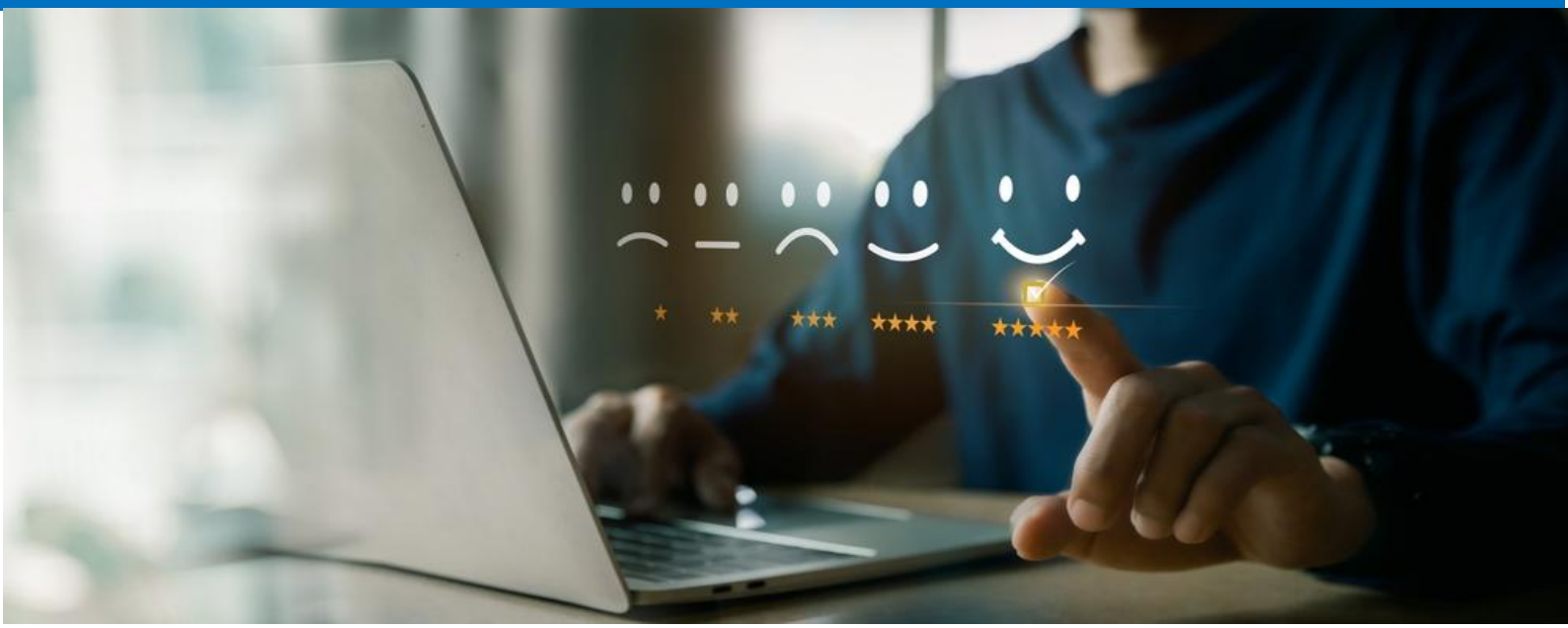
- **Confidentiality and Data Protection**

We treat company information with due care

Protect sensitive company information and respect the privacy of colleagues and customers, ensuring data is handled responsibly. Maintaining confidentiality is essential for building trust within the organization and with our customers. Employees must be aware of the types of information that are considered confidential, including financial data, proprietary business strategies, and personal information of both co-workers and customers. Safeguarding this information is not only a legal obligation but also a fundamental aspect of our ethical responsibility.

When handling sensitive data, always follow established protocols for storage, transmission, and disposal. Use secure channels for sharing information, and ensure that access to confidential data is restricted to those who require it for their roles. Employees should refrain from discussing sensitive information in public spaces or using unsecured devices. By adopting these practices, we minimize the risk of data breaches and uphold our commitment to protecting the integrity of our operations.

In the event of a suspected data breach or accidental disclosure of confidential information, report the incident immediately to the designated GDPR team. Prompt reporting is crucial in mitigating potential harm and ensuring that appropriate corrective measures are taken. Additionally, employees are obliged to participate in annual training sessions on data protection to stay informed about best practices and legal requirements. By prioritizing confidentiality, we can cultivate a safe and trustworthy environment for everyone involved.



- **Fair treatment**

We respect each other

Treat all individuals fairly and without discrimination, fostering an inclusive workplace that respects diversity. Our commitment to fairness means recognizing and valuing the unique contributions of every employee, regardless of their background, identity, or personal characteristics. It is essential to create an environment where everyone feels welcome, respected, and empowered to express their ideas and perspectives. Embracing diversity not only enhances our workplace culture but also drives innovation and success.

All employees are expected to actively promote inclusivity by challenging biases and stereotypes, both in themselves and in others. This includes being open to different viewpoints and experiences, and seeking to understand and learn from one another. Discrimination, harassment, or any form of bias based on race, gender, age, religion, sexual orientation, disability, or any other characteristic will not be tolerated. We all share the responsibility to hold ourselves and our colleagues accountable, ensuring that our workplace is free from hostility and prejudice.

Employees are invited to voice their concerns or suggest improvements to our practices related to fairness and inclusivity. By working together, we can create a supportive atmosphere that not only respects individual differences but also leverages them to achieve our shared goals. In doing so, we ensure that everyone has the opportunity to thrive and contribute to our collective success.

- **Commitment to Quality**

We strive for excellency

Strive for excellence in all tasks, ensuring that work meets or exceeds the company's quality standards. A commitment to quality is not merely an expectation but a core value that drives our success and reputation in the industry. Each employee plays a crucial role in maintaining these standards by taking personal responsibility for the quality of their work. This involves being attentive to detail, continuously seeking improvement, and being open to constructive feedback.

To achieve and uphold high-quality standards, employees should engage in ongoing professional development and training opportunities. Staying informed about best practices, industry trends, and innovative techniques allows us to enhance our skills and deliver exceptional results. Collaboration with colleagues also fosters an environment where knowledge is shared, enabling teams to leverage each other's strengths and collectively elevate the quality of our outputs.

In instances where quality may be compromised, it is important to communicate openly and promptly with supervisors or team members. Addressing potential issues early can prevent larger problems down the line and demonstrate a proactive approach to maintaining excellence. By cultivating a culture of accountability, support, and continuous improvement, we reinforce our commitment to quality and ensure that our work consistently reflects the high standards our customers and stakeholders expect. Together, we can build a legacy of excellence that benefits both our organization and the communities we serve.

4. Our Portfolio: Services and Industry Solutions

Our mission is to support our customers in achieving their goals as well as their strategic and operational requirement. We strive to deliver high-quality services that meet the needs of our customers and exceed their expectations.

Fleet Logistics is Europe's largest and longest established independent Fleet Management company, with a legacy of more than 27 years and managing more than 150,000 vehicles worldwide. We are a truly independent fleet solutions integrator, providing best-in-class vehicle management by optimising the entire fleet supply chain in a truly transparent way, in order to reduce and control our customers' TCO and deliver a return on investment.

Fleet Logistics combines operational excellence with strategic evolution to deliver a truly exceptional and market leading proposition. Today, we are providing services across 31 markets and are serving many of the world's largest corporations.

5. Our Reporting Procedures

We behave correctly

Reporting Misconduct

Promptly report any observed violations of the Code of Conduct, company policies, or applicable laws to the appropriate channels. It is essential to maintain an environment where individuals feel empowered to speak up without fear of retaliation. All reports will be taken seriously and investigated thoroughly, ensuring confidentiality and protection for those who come forward in good faith.

When reporting misconduct, provide as much detail as possible, including specific incidents, dates, and individuals involved. This information will assist in conducting a comprehensive investigation. Employees are encouraged to document their observations to support their claims and facilitate a more effective review process. Remember, raising concerns is a vital part of fostering a transparent and ethical workplace.

Retaliation against anyone who reports misconduct or participates in an investigation is strictly prohibited. The company is committed to ensuring that all employees can raise concerns and contribute to a safe and respectful workplace. If you believe you have faced retaliation, report it immediately through the established channels. Your voice matters, and we are dedicated to creating an atmosphere of trust and integrity for everyone.

By adhering to this Code, we can ensure that Fleet Logistics remains a trustworthy and reputable leader in fleet management.

Fleet Logistics encourages its employees to report any potential violations of the Business Conduct Guidelines. By doing so, you contribute to identifying and addressing misconduct and grievances, helping to protect both ourselves and the company from associated risks or damages.
If you encounter situations that suggest a violation of the Code of Conduct, please report them to the following individuals or departments:

- Line Managers;
- Compliance Officer;
- Legal department;
- Human Resources personnel;
- Employee representatives.

Fleet Logistics employees can find contact details for relevant personnel on the intranet.

This Code of Conduct is endorsed by the leadership of Fleet Logistics and is applicable to all employees, business partners, affiliates and stakeholders.

Thank you for your commitment to these principles.

6. Imprint

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