



CODE OF CONDUCT

Why “Corporate Compliance”

As a global forwarding and logistics company, Five Star is valued by customers and partners for its great reliability and service quality. While this reputation may have taken years to earn, it can be damaged in an instant by the rash and improper actions of just one employee. This must be prevented. It is therefore important that every employee's actions are guided in particular by the principles set out in these corporate compliance principles. Because every employee influences the reputation of the company through their professional actions.

This code serves as the basis for lawful and rule-compliant behavior. However, it neither covers all conceivable situations nor does it describe all the applicable rules that must be observed in individual cases. The applicable national law often formulates stricter standards that must be observed in every case. The conduct guidelines described here attempt to summarize and illustrate the essential aspects of corporate compliance, although the catalog of topics listed here is expressly not intended to be exhaustive and lawful behavior is required in every respect and with regards to all applicable legal regulations. The corporate compliance principles can only highlight areas of particular importance in practice. In addition, they should encourage employees to familiarize themselves with the rules that apply to them and, if in doubt, to seek advice, because ignorance does not protect against the possible consequences of irregular behavior.

Introduction

Corporate compliance means lawful and rule-compliant behavior. Every employee has the obligation to comply with the applicable company-specific and legal rules in their professional activities.

This Code of Conduct represents a regulatory framework that applies to every employee of the group, regardless of their position within the group. It is intended to help overcome ethical and legal challenges in daily work.

If rules are violated, employees cannot claim that they wanted to act in the interests of Five Star. Because all rule violations always harm the company in the long term. The resulting supposed advantages in individual cases are never, even economically, advantageous for the company as a whole in light of the conceivable consequences. If a transaction is only possible if it involves illegal or unethical behavior in some way, it will not be considered for us.

An employee who refrains from such a transaction will not suffer any disadvantages.

Violations of applicable laws and ethical principles can have far-reaching consequences for the company. Among other things, there is a risk of: fines, compensatory and punitive damages, exclusion from orders, damage to image, termination of business relationships, attempts at blackmail, negative assessments on the capital market.

Individual employees who violate applicable law and ethical principles are also threatened with severe consequences, such as imprisonment or fines, claims for damages and consequences under labor law, including termination.



The companies of the Five Star Group operate globally. Our employees are therefore subject to a wide range of standards and ethical principles - including those with which they are often unfamiliar. Apparently purely local processes can also be subject to foreign legal systems. The corporate compliance principles are intended to provide assistance in daily work and thus help employees to protect themselves from misconduct.

We are committed to separating corporate and private interests

All employees must always separate their private interests and the interests of the company. Conflict situations between business and purely private interests, or even the appearance of them, must be avoided in any case. Possible conflicts of interest must be resolved by involving your superior.

Every employee must separate their private interests from the company's interests. The prerequisite for avoiding conflicts of interest is the professional, independent and impartial handling of official tasks. When it comes to internal decisions or business relationships with third parties, only objective criteria count.

Secondary activities are subject to approval and must not have a negative impact on the interests of the company.

Conflicts of interest can arise, for example:

Personnel decisions: These must not be influenced by private interests or relationships.

Business relationships with third parties: These may only be based on objective criteria (e.g. price, quality, reliability, environmental compatibility and technological standards, product suitability, existence of a long-term and conflict-free business relationship). Personal relationships, interests, material or intangible advantages may not influence the conclusion of a contract or the continuation or termination of a business relationship with third parties. A special note to the respective superior is also required if employees of our group of companies or close relatives of an employee establish a delivery or service relationship with our group of companies through their own company.

Principles of our actions

Private commissioning of suppliers or other business partners: If an employee can directly or indirectly influence the business relationship between companies in our group and the supplier or business partner, a private commissioning of this supplier or business partner is always a process that the employee must report to his superior must be approved by him.

Use of Five Star employees for private purposes: It is not permitted for superiors or managers to use the work of employees of our group of companies for private purposes by abusing their ability to give instructions.

Use of company property (e.g. equipment, inventory, vehicles, office supplies, documents, files, data carriers): No employee may use items belonging to our group of companies for private purposes or remove them from the company premises without the express consent of their superior. Data sets, programs or business documents may not be copied or removed from the company without permission.



Taking up additional employment relationships: Every employee must have their supervisor approve their intention to take up additional employment relationships - including as part of a freelance workforce - or their intention to undertake active entrepreneurial activity. This applies in particular to the assumption of functions in companies with which our group of companies has or could have a business relationship or a competitive relationship.

Private activity in parties or other social, political or social institutions: The Five Star Group welcomes the voluntary commitment of its employees - however, care must be taken to ensure that this commitment is compatible with the fulfillment of the obligations under the employment contract.

We are committed to integrity in business transactions - no corruption

Corruption is not tolerated within the Five Star Group.

In many countries around the world, corruption is prosecuted as a criminal offense, regardless of whether it occurs domestically or internationally. Employees may never, and in no country in the world, attempt to unlawfully influence business partners - neither through favors nor through inappropriate gifts or the granting of other advantages. This applies in particular to cooperation with representatives of authorities or public institutions.

The entire group of companies does not tolerate any form of corruption, bribery, corruption or other illegal granting of advantages. Violations by employees will result in termination of employment and criminal prosecution. The employees of Five Star undertake, neither on their own behalf nor on behalf of third parties, to accept benefits in the form of monetary or material benefits and services from persons or companies with which the group of companies has business relationships or who are interested in establishing a business relationship to offer such. Excluded are low-value tokens and occasional invitations that are within the scope of social customs and within the legally permissible, normal and customary scope of sales promotion. The regulations in the Code of Conducts of our business partners (especially customers) regarding discounts must always be given priority.

For our group of companies, no transactions are considered that involve the violation of legal provisions or company regulations in connection with the granting or acceptance of benefits. We accept if this means that a deal cannot be concluded. No increase in sales and profits can ever justify unlawful business practices. This applies to the entire group without exception. No employee, regardless of the country they work in, is allowed to ignore this. Any donation is considered an advantage, even if it is only indirect (for example to friends or relatives or clubs).

The acceptance or granting of benefits must be in accordance with the law and our internal company rules. Stricter regulations must always be observed with priority.

In any case, it is prohibited to request personal benefits and to offer or give cash or cash-like benefits. This situation must be clearly differentiated from payments that are made as donations (see the following section). The following applies to the granting and acceptance of advantages from business partners: The advantage may not occur in connection with the initiation, awarding and processing of an order, and it may only be an advantage that is permitted under the legal systems to which the donor and the acceptor are subject, can be viewed as legally harmless. If there are any doubts, a careful legal examination must be carried out.



Principles for donations and sponsorship of the Five Star Group

Our economic success also depends on social acceptance and the trust of those around us in our actions. Therefore, for us, responsible corporate policy also means taking on social responsibility. This is particularly true in the local and regional environment of our locations.

The topic of education and the target group of children and young people are a focus of our commitment.

Payments that are clearly and unambiguously made as donations represent an advantage for the recipient of the donation, but do not fall under the compliance issue provided they are in accordance with the law and our internal company rules.

We are committed to fair competition - no prohibited cartel agreements

The Five Star Group is committed to the market economy without any restrictions. Antitrust law is an important instrument for protecting fair and undistorted competition.

The companies in the Five Star Group strictly adhere to applicable antitrust laws. These laws promote and protect free and fair competition worldwide and prohibit any anti-competitive behavior such as: secret price agreements. In this context, no employee of the company is permitted to participate in price fixing, concerted procedures in public tenders, the allocation of markets or customers or in similar illegal anti-competitive activities.

The protection of competition through antitrust law is guaranteed by prohibiting antitrust agreements between competitors and by prohibiting antitrust mechanisms in contracts between suppliers and customers.

The most important antitrust taboos are:

Price agreements, agreements on market shares, capacity agreements, division of regional markets, division of customers, price fixing. Violations of the antitrust law applicable in the individual countries, and in particular against the US and European antitrust law, can be the case for Five Star as a company as described in the introduction have the dramatic consequences shown. In the event of antitrust violations, there is a risk of severe fines, claims for damages, exclusion from public contracts and loss of image. But the employees involved can also be personally exposed to far-reaching consequences, including being sentenced to prison. Five Star will also show no leniency internally toward employees who violate antitrust laws. Even if a business area gets into a crisis through no fault of its own, self-help through cartel agreements cannot be justified. Even in a crisis, only lawful measures are permitted. The effect principle applicable in antitrust law is of particular importance: It is not just important in which national territory a violation of antitrust law is committed; it may be sufficient that such a violation has a negative impact on competition in another territory.

Already a coordinated behavior ("concerted actions"), informal discussions or informal "gentlemen's agreements" that have the purpose or potential of restricting competition are prohibited. The appearance of such a conspiratorial event must also be avoided. Coordinated behavior with other bidders - especially in private tenders and public procurement procedures - is strictly prohibited not only under antitrust law but also under criminal law. All (even planned) agreements with competitors - even if they relate to areas outside the competitive situation - must be carefully examined in accordance with the guidelines set out here.



Caution is advised when dealing with market information. Market observation and market research are indispensable and of course generally permissible. But not all means of obtaining information - such as certain organized market information procedures - are suitable for this. The targeted, often bilateral exchange of future-oriented information about prices, customer relationships, conditions, upcoming price changes, etc. with competitors is critical and must therefore be avoided.

Your own calculations, capacities or plans may not be disclosed to competitors. Competitively sensitive information must be anonymized in such a way that its origin can no longer be identified and thus an influence on current market events can be ruled out. Finally, antitrust law must also be taken into account when drafting contracts between suppliers and customers. Clauses that influence resale prices, impose restrictions on use or resale, or establish exclusivity agreements must always be subject to careful legal review.

We are committed to protecting employee rights and upholding ethical principles

We face social responsibility and oblige all managers and employees in all national companies to uphold ethical principles. The Company is committed to ensuring that the following principles are respected in all of its locations around the world.

Prohibition of discrimination, bullying and harassment

Five Star will not allow any discriminatory actions or commit any acts. Discrimination means any kind of distinction, exclusion or preference that limits equal treatment or access to work and employment, which may be based on skin color, gender, religious belief, political opinion, age, national, social or ethnic origin, family responsibilities or similar considerations can be attributed to this type. Five Star is also committed to workplaces that are free from any kind of harassment. Personal dignity and privacy are inviolable. We are committed to equal opportunities in all matters. We do not tolerate discrimination or bullying.

Fair wages and working conditions

The company guarantees that it will not pay wages below the legal minimum wage. Five Star will not reduce or withhold pay for disciplinary reasons or as a condition of employment. Remuneration paid to employees must comply with all applicable wage and salary laws, including minimum wage, overtime and statutory benefits. Employee rights are respected everywhere.

Health and safety at work

The company ensures that the workplace and its surroundings (machinery, equipment and work processes, chemical agents, etc.) do not endanger the physical integrity or health of employees. Appropriate measures to reduce the risk of accidents and improve working conditions are the goal of regular internal investigations. Violence and threats in the workplace are not tolerated, nor is working under the influence of legal and illegal drugs. The employees also receive training on safety and health at work. Employees must have guaranteed access to sanitary facilities and social spaces that have been established and maintained in accordance with the applicable legal regulations.

The workplace and its surroundings must have suitable emergency exits, fire protection devices and sufficient lighting. Adequate protection for non-smokers must also be ensured.



Working hours and employee rights

Five Star guarantees that the applicable legal working time restrictions are adhered to. The maximum permitted working hours per week is regulated by national laws and in accordance with the conventions of the International Labor Organization. The limitation of overtime is regulated in accordance with regional legal or contractual obligations. Five Star recognizes and respects the right of employees to freedom of association and their right to freely and independently choose their representatives and guarantees that these representatives are not subject to any form of discrimination.

Prohibition of child labor

Five Star does not accept employment of children under the age of 16, even if local law permits it. General education or training programs enjoyed by children in schools or other institutions are not subject to this restriction. All young workers must be protected from carrying out any work that is likely to be dangerous or to impair training or jeopardize health or physical, psychological, social, intellectual or moral development.

We are committed to protecting natural resources and the assets of the group

Concerns regarding the efficient use of natural resources are implemented at Five Star. The employees in our group will take this into account in every situation when using company work equipment and keep consumption within the necessary limits. Procedures and standards for waste treatment, for the handling and disposal of chemical and other hazardous materials, for emissions and for wastewater treatment must at least meet or exceed the minimum legal requirements.

Existing intellectual property, as well as results and findings from the services provided by Five Star, must be protected from unauthorized use and disclosure. All employees are obliged to do everything necessary to adequately secure the group's assets. In addition, all employees are obliged to ensure a quick and smooth exchange of information within the company. Knowledge relevant to the activity must not be unlawfully withheld, falsified or selectively passed on.

We are committed to protecting quality and continuously improving it

Ensuring the highest quality and its continuous optimization are the foundations of Five Star's success. Our domestic and foreign customers expect conscientious care when carrying out our tasks. This code provides the guidelines against which important actions or activities in the fulfillment of tasks are to be measured.

We are committed to protecting data and IT security

Compliance with data protection regulations is mandatory. In any case, confidentiality must be maintained about business transactions. Compliance with data protection regulations and confidentiality obligations towards our customers and other people must be strictly observed in personal behavior as well as in the technical environment. The informal right of self-determination of employees and business partners must be protected; All employees are obliged to comply with all data protection regulations and requirements. Due to the internal use of IT systems, the business activities of the entire group of companies are heavily dependent on their functionality and availability. Controlling and minimizing the risks arising from this dependency must therefore be given the highest priority.



We are committed to complying with, communicating and monitoring these rules

Every supervisor must organize his area in such a way that compliance with the rules of the corporate compliance principles and legal regulations is guaranteed. This includes, in particular, communication, monitoring and enforcement of the rules relevant to his area of responsibility. Grievances must be actively addressed and corrected. Every supervisor is required to be a role model for their area through their personal integrity and in this way ensure that corporate compliance is actually lived as an essential part of our corporate culture.

What do these principles mean for each individual in their everyday professional life?

The Code of Conduct sets a minimum standard for all Five Star employees and is binding for them. Violations of the Code of Conduct are therefore consistently pursued and sanctioned in the interests of all employees. Every employee is obliged to inform themselves about the existing internal and external regulations in order to ensure that they act in accordance with them.

to review their own behavior against the standards of the corporate compliance principles and to ensure that these standards are adhered to. Rule- and law-abiding behavior ("compliance") is part of the performance evaluation of every employee, without the need for a special agreement in this regard.

It should be noted that special legal and internal company regulations specify the content of the individual topics addressed here. Every employee must familiarize themselves sufficiently with the legal regulations and internal regulations relevant to their area of activity and observe them in their daily work. Doubts must be dispelled in order to avoid violations of laws and regulations. The rules of these corporate compliance principles take precedence over any conflicting instructions from a superior.

The corporate compliance principles are both an obligation and a protection for every employee.

They describe the framework within which Five Star employees can move safely and thus serve both the individual employees and the success of the company as a whole.

Norderstedt, February 2024

A blue ink signature of Christian Speit, consisting of a stylized 'S' and 'C'.

Christian Speit

A blue ink signature of Fabian Dabelstein, appearing as a cursive 'FD'.

Fabian Dabelstein

A blue ink signature of Pierre Koester, a cursive signature.

Pierre Koester