

INPACS Code of Ethics

Dear INPACS Colleagues,

Worldwide the INPACS Group and its members stand for reliability, dynamism and integrity. This governs us in our daily actions, thoughts and our understanding of values that we follow together since our formation in 2004 as a pan-European network of family owned distribution companies.

A company always acts through the actions of its people. The reputation of the INPACS Group and of each member is therefore essentially shaped and strengthened by each employee's daily appearance, action and behavior.

Be it as an owner, management executive or employee – every one of us holds the responsibility to ensure that the high expectations towards the INPACS are exceeded. A single event of improper behavior or infringement of legal regulations and morality can cause substantial damage to our network and therefore to all its members.

For this reason there has always existed a code of conduct at INPACS, an unwritten law amongst the members with an unquestioned validity which will be for the first time documented by this INPACS Code of Ethics.

This code shall serve as a framework for guidance, assisting in response to ethical and legal challenges within the daily work and to provide a common perspective in conflicts and prevent situations from developing which might cause a question to our integrity. In particular all employees can benefit from the security, which this guideline offers for their daily actions.

The INPACS Code of Ethics reflects the code of conduct we have been pursuing for some years together with our suppliers and service providers on an international scale, obliging them to display behavior that is consistent with the highest legal and ethical standards.

It is not sufficient to simply acknowledge the INPACS Code of Ethics. Rather every one of us is required to review his or her own behavior in the light of this code and identify areas for potential improvement, verifying his or her contribution to the fulfillment within his or her responsibility.

It is our common obligation to respect, protect, and promote the INPACS Group and its reputation by adopting this INPACS Code of Ethics and to act with professionalism and responsibility.

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Our Integrity

We act in accordance with applicable laws and regulations and respect the human rights and common occupational health and safety standards. In case of the smallest uncertainty we will consult the responsible senior management or an appropriate legal expert within our company.

Fundamental Rights of Employees¹

The respect for the fundamental rights of our employees is an integral part of our actions at INPACS. This includes the promotion of equal opportunities and equal treatment for each individual and stakeholder at INPACS, irrespective of the color of their skin, race, nationality, social background, disability, sexual orientation, political or religious beliefs as well as gender or age. We respect the personal dignity, privacy, and personal rights of every individual. No one will be compelled to work against his or her will or under the threat of punishment. We refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination and will not accept any behavior (including gestures, language or physical contact) which is sexual, coercive, threatening, abusive or exploitative.

Health and Safety

The health and safety of our employees has absolute precedence over any other consideration at INPACS and is firmly integrated in our environmental and quality management system. The environmental advisors, safety advisors, occupational physicians and occupational safety specialists as well as the employers' liability insurance association and multiple other internal and external institutions ensure that the installations and procedures in place protect the employees and comply with legal and management provisions in regard to safety, health and environmental requirements.

In addition every one is required to take care of not only their own health and safety but also of that of their colleagues and all other persons in their vicinity and to call attention to deficiencies should they emerge. This applies equally to internal and external personnel as well as to outside companies such as e.g. contractors.

In relation to policies on health and safety at work, hygiene is an essential part of infection prevention. For our safety we always pay attention to sufficient hand hygiene and take an appropriate distance from our colleagues in case of a mild infection, e.g. refraining from shaking hands. In case of a serious or contagious disease we will consult a doctor.

Being under the influence of alcohol at the workplace can put us and our colleagues in great danger. The consumption of alcohol prior or during the working hours is therefore strictly forbidden.

Responsibility for the Environment

In order to protect the environment we at INPACS have committed ourselves to improve energy efficiency and to reduce environmental pollution. The key elements in this effort are the reduction of resource consumption such as fuel, energy and water and the mitigation of environmental impact through waste, chemicals and greenhouse gases. Contributing to the protection of the environment is the responsibility of every individual – beyond mere conformity with the respective policies in their field of business.

¹ See: Universal Declaration of Human Rights adopted and proclaimed by General Assembly of the United Nations, resolution 217 A (III) of 10th December 1948

Dealing with colleagues, business associates and third parties; conflicts of interest

In our day-to-day business we come into contact with numerous persons involved with INPACS – the driver with the customer when he delivers goods, the sales agent when he calls a customer, the managing director when he meets a supplier for annual negotiations, the safety advisor when he contacts the employers' liability insurance association or even the apprentice when he talks to his classmates in vocational school.

In the course of all these contacts we must pay attention that our interactions are always characterized by openness, fairness, respect, integrity and reliability. The same applies to dealings with colleagues.

The customer stands at the focal point of all our activities. In order to suit his every key need in an optimal manner a maximum of service orientation is necessary. We always look for the best solutions. In order to provide these, we frequently need the support from other departments, branches or even members. In all these dealings with colleagues the service mentality is of equal importance as it is towards our customers. This is the only way we are able to use our strengths to best effect and to guarantee the outstanding level of service and performance INPACS is renowned for.

When tensions develop between colleagues we are committed to solve these issues in a timely manner and will do whatever is necessary in order to solve any problem. In case of difficult situations management executives will provide assistance.

Offering and Granting Benefits

The offer or receipt of gifts, hospitality or expenses in the context of business transactions can create a conflict of interest. In the vein of normal commercial practice we do not approve of any benefits which hold the potential to influence decision-making processes.

Should the rejection of a gift conflict with the command of politeness due to regional customs or due to the public setting, it may be accepted in order to utilize it for its original purpose of use². In case of doubt we seek advice from the respective responsible management executive.

No employee may use his or her job title to demand, accept, obtain, or be promised advantages.

Gifts to employees of business partners must be selected so as to avoid any appearance of bad faith or impropriety in the mind of the recipient. When dealing with government officials or authorities, no gifts are granted at all.

Employees who sign contracts with consultants, agents or similar third parties must ensure that the latter also comply with these rules. Should they fail to respect this, their contract shall be terminated or not renewed.

Donations

As an international group of family owned companies we regard it as our duty to become involved both vocationally and socially. Our determination is to provide aid wherever help is needed and that this help ends up where it is intended. We concentrate our efforts on social projects and aid organizations which help people in need, people suffering from illnesses, and disadvantaged youths and adults – through donations of money, equipment and volunteering of our employees.

It is our policy not to make donations to political parties, individual persons, profit-oriented organizations or organizations whose objectives are contrary to the principles of INPACS and those of its members or harmful to the groups reputation. Donations made must always be transparent – i.e. the identity of the recipient and the

² e.g. INPACS HO: Christmas tombola for employees

intended use of the donation are known and the reason for the donation and the purpose for which it is to be used are legally justifiable.

Competition

We observe the rules of fair competition and support all efforts to preserve a free market and open competition, both nationally and internationally. All employees of INPACS and of its members adhere to the principles and rules of fair competition and comply with EU and domestic antitrust laws. The rules for fair competition are an absolute prerequisite for a performance based market economy in order to promote economic efficiency, development and innovations. We therefore reject any practices which harm fair competition or inadmissible means that aim at gaining unfair competitive advantages.

Advertisements

All communications and advertising publications of the INPACS Group and its members shall be truthful and unambiguous. Additionally, we will only advertise in media that is relevant for the various business areas from a professional point of view and that are consistent with our values and principles of business conduct. In case of sponsorship activities we expect proven communication and marketing capacity from our sponsoring partners. By supporting suitable sponsoring partners, we aim to strengthen the image of INPACS as a global One Stop Solution Provider for whom tradition and innovation are equally important.

Conflict of Interest through Outside Employment

Should we make our labor available to third parties outside of our primary employment this constitutes an outside employment. Any outside employment requires the consent of the primary employer in order to prevent a potential conflict of interest. We will not engage in an outside employment that is contrary to INPACS or its members, especially if this could harm fair competition.

Handling of Company Property

All management executives or employees of INPACS and its members have the responsibility to preserve and protect the company's property and to promote its responsible and caring use. Company property constitutes all products and resources which have not been acquired by an employee. This includes all working equipment – may it be a ballpoint pen, merchandise, samples or a company vehicle. This also applies to immaterial goods such as electricity, information or data.

Company property, may it be of INPACS or of its members, is only to be utilized by its employees in connection with their business tasks and the respective company's goals. Alternative utilization of company resources is only allowed with the explicit permission of the responsible management executive.

Handling of Information

Dealing with information and the secure use of our IT systems is an important component of our information management. All employees are therefore required to adhere to their IT guidelines in order to maintain the general public's confidence in INPACS and to minimize the risks related to entrusted business secrets as well as the protection of personality rights.

Records, Reports and Transparency

Accurate and transparent reporting is a necessary prerequisite to ensure a fair and effective cooperation with customers, colleagues, employees, business partners and all government officials or authorities.

Any report, recording of data and other records must always be complete, correct, on time, easily comprehensible and in accordance with the applicable law and legislation. In case of doubt we will follow a conservative and prudent approach in making evaluations and decisions. We thoroughly inspect all records and reports on completeness, orthography and linguistic expression. In case of queries we also provide an indication of its author, the date of its creation and the mailing list if this should be applicable. All

correspondence with external parties, i.e. customers, suppliers or governmental authorities, requires a signatory or if applicable even dual signatories. In case of electronically transmitted correspondence the second signature may be substituted by the cc-function upon prior agreement.

The internal dissemination of data in scope of the general work flow is possible without limitations as long as it does not exceed the requirements for the commissioned process. In case of doubt we seek advice from the respective management executive or data protection officer.

Professional Secrecy

We shall exercise the greatest discretion with regard to all corporate matters which have not been made known to the public and are therefore considered internal information. During personal conversations and phone calls with colleagues in public, i.e. in the public transport, we are especially careful about the security and confidentiality of the information. Additionally, we protect our business documents from prying eyes.

Data Protection and Data Security

We are aware of the high sensitivity of the personal data entrusted to us. A wide range of technical and organizational measures assures the integrity and confidentiality of the data.

We survey, process and use personal data of our customers only to the extent necessary in order to perform the commissioned process. We take suitable measures to protect entrusted data against accidental or intentional manipulation, loss, destruction or against access by unauthorized persons. Data, data carriers and lists are destroyed if they are no longer needed rendering misuses impossible. Passwords and other forms of access to our INPACS intranet, member networks or any other application with sensitive information are always treated confidential and will not be made available to unauthorized persons.

These actions are inspired by the principles of *Data Minimization* and *Data Avoidance*.

The utilization of own personal data is done in a clear and transparent manner for those concerned. Every employee has the right to access and inspect their personal data and has the right to make a complaint or rectify it.

Management Responsibility and Personnel Development

Only when we are highly motivated, well-trained and dedicated to our work can we achieve excellent results in order to exceed the high expectations of our customers. It is for this reason that each management executive bears a special responsibility for his or her staff and must gain their support and recognition.

Our management executives encourage their employees to develop their skills by giving them leeway for professional development and by fostering personal development. They lead by example displaying exemplary behavior based on performance, openness and social competence as described in this INPACS Code of Ethics. The management executives must clearly communicate to employees the importance of the INPACS Code of Ethics.

Each management executive is responsible for the planning and deployment of employees in their area of expertise, as well as the fostering and securing of process know-how within INPACS. The tasks commissioned must be understandable for the employees and supervised by the management executive. This supervision through the management executive does not relieve the employee of his or her own responsibility.

Our employees are evaluated and fostered on binding standards, based on their individual performance and potential. The observations from these assessments go hand in hand with an individual development plan that the management executive and the employee draw up together.

Suggestions and Remarks

Each one of us is an expert in his or her field and is therefore best suited to identify potential for improvement that leads to pragmatic proposals and recommendations for solutions. It is for this reason that everyone is called upon to regularly reflect on his or her work and make suggestions for improvement. Whether they are large or small, combined they produce a greater effect and secure a sustainable future of INPACS and its members.

Equally, everyone carries the responsibility to point out all relevant circumstances that indicate a non-compliance of any ethical-legal principle documented in this INPACS Code of Ethics. Such indications must be sufficiently defined and submitted in writing.

All owners, management executives and employees of INPACS and of its members shall report every incident of non-compliance with the INPACS Code of Ethics and shall be responsible to ensure the protection of those who have reported such a violation in good faith. In addition to any reports made to owners and management executives these can also be submitted directly to the INPACS Head Office. The reports, including those which have been made anonymously, will be analyzed by an authorized INPACS representative and if necessary, suitable measures will be initiated by the INPACS management and the member concerned. All information and reports received will be treated in a confidential manner. All reporting employees will be protected from dismissal or any other adverse treatment or adverse consequence of this reporting, including the taking of judicial action.