

# Code of Conduct of the Transporeon Group

comprising the following companies:

TP Group Holding GmbH Ulm / Germany	Transporeon SRL, Bolzano / Italy	ControlPay B.V., Breda / the Netherlands
TP Management GmbH, Ulm / Germany	Transporeon TOV, Kyiv / Ukraine	ControlPay Netherlands B.V., Breda / the Netherlands
Transporeon GmbH, Ulm / Germany	Transporeon India Ltd., Hyderabad / India	ControlPay Ukraine LLC, Kyiv / Ukraine
Transporeon Sp. z.o.o., Kraków / Poland	Transporeon Iberia Solu- tions S.L. Madrid / Spain	ControlPay Audit Ukraine LLC, Kyiv / Ukraine
Transporeon O.O.O., Moscow / Russia	TNX Limited, Auckland / New Zealand	ControlPay GmbH, Mön- chengladbach / Germany
Transporeon B.V., Nijkerk /the Netherlands	TNX Europe GmbH, Berlin / Germany	ControlPay Latam EIRELI Campinas, SP / Brazil
Transporeon Group Asia Pacific, Pte. Ltd. / Singapore	Transport Ninja Manage- ment (US) LLC, Wilming- ton / U.S.A.	ControlPay (Shanghai) Lo- gistics Consulting Co. Ltd., Shanghai / China
Transporeon Group Americas, Inc., Pennsylvania / U.S.A.	SupplyStack, Antwerp / Belgium	ControlPay North America Inc. / U.S.A.
Transporeon SAS, Paris / France	Logit One NV, Antwerp / Belgium	Sixfold GmbH, Ulm / Germany
Transporeon ApS, København / Denmark	Nexogen Kft Budapest / Hungary	Sixfold OÜ, Tallin / Estonia

## TP Management GmbH

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DE - 89075 Ulm, Germany

**TRANSPOREON**  
Delivering connections

## Code of Conduct – Our Transporeon Values

Dear Colleagues,

Dear business partners,

Transporeon is a globally operating group of companies that provides cloud-based software for the optimization of transport logistics processes.

Our aim is to be economically successful, thereby maintaining a high degree of integrity and fulfilling our social responsibility. Employees, managers, our business partners and customers may be confident that our work is characterized by professionalism, reliability and fairness.

In order to achieve these goals, we have group-wide binding ethical rules that guide us in our dealings. These serve as an orientation and guideline for decisions and actions of the company as well as for each individual.

With kind regards,

Transporeon Management Team

## Information Security Objectives

Transporeon operates a business model based on the exchange of information between different parties by a cloud-based communication platform. If Transporeon cannot guarantee this exchange of information reliably, we severely disrupt the processes on the customer side in the event of an outage, apart from losing customer confidence. On customer side, this can lead to a loss in revenue and can be attributed to Transporeon.

It is therefore important that Transporeon handles customer data with care and essentially guarantee confidentiality, integrity and availability. Since this is not always attainable without restrictions, we must manage risks carefully and in an economical manner.

In addition to the requirements of our customers, we must consider and comply with the legal requirements in the countries in which we operate. Furthermore, the secure handling of personal data provided by customers and also Transporeon group employees is very important to us.

This results in these comprehensive objectives:

- Conscious handling of risks regarding economic aspects
- High-platform availability
- Ensuring confidentiality and integrity of customer and personal data
- Compliance with legal and contractually agreed requirements

## Information Security Certification

### Information security management system according to ISO 27001

Since June 2016 Transporeon GmbH in Ulm has a certified information security management system according to ISO/IEC 271001:2013. Further companies in the Group will follow. This underlines our commitment to meet the security requirements of our partners and employees.

The internationally recognized standard of information security ISO / IEC 27001 serves as a control instrument for the identification, evaluation and assessment of risks in our dealings with our information values. This enables us to achieve a defined security level within our business activities.

An independent and recognized certification by an accredited testing body confirms our efforts to ensure the agreed security objectives in the long term.

In order to achieve conformity with the ISO 27001 requirements, the following focus areas have been optimized at Transporeon:

- » Information security guidelines
- » Organization of information security
- » Human resource security
- » Asset Management
- » Access control
- » Cryptography
- » Physical and environmental security
- » Operations security
- » Communications security
- » Acquisition, development and maintenance of systems
- » Supplier relationships
- » Management of information security incidents
- » Information security aspects of business continuity management
- » Regulatory compliance
- » Communications security
- » Acquisition, development and maintenance of systems

## Transporeon assumes Responsibility

### **Compliance with the law**

Compliance with applicable law is a matter of course for all employees of Transporeon and an integral part of every business activity. Human rights must always be respected. For example, no child or forced labor. Working hours must always comply with applicable laws, salaries in accordance with the usual standards or the local remuneration.

### **Free competition**

In all business agreements as well as business relations with third parties, we pay particular attention to the legal requirements for safeguarding free competition. We do not participate in price agreements or prohibited coordination of the market behavior between competitors. We are committed to fair dealings with our business partners and competitors and do not abuse the existing scope for action.

### **Avoiding conflicts of interest and corruption**

We prevent corruption in our company and demand reputable business practices from our employees, partners and customers. Services, gifts or advantages that could affect the personal conduct of the employees with regard to activities for the company are not to be permitted or accepted.

### **Occupational Health and Safety**

We offer a health supportive work environment and promote proactively the health of our employees. We expect our partners to take due account of the health of their employees.

### **Prohibition of discrimination**

No one may be discriminated against because of his/her race, ethnic origin, sex, religion, disability, age, sexual orientation or other personal characteristics. Transporeon undertakes to respect the personal dignity, privacy and personality rights of each employee and to protect employees from harassment and discrimination.

### **Environmental protection**

All applicable environmental standards must be observed for services or goods. Particular care must be taken to avoid unnecessary printouts and copies and to introduce a recycling system. Energy-efficient systems are preferred when purchasing new equipment.

### **Protection from disasters**

There are disaster plans to protect workers and the environment as far as possible from the effects of possible disasters that occur in the company's surroundings.

## What we stand for

### Adherence to the Code of Conduct

Our Code of Conduct applies to all persons around the world working for the companies of Transporeon: managers, executives and all employees. It also applies to consultants and persons who are working on behalf of Transporeon. We also expect our business partners to base their actions on the same ethical principles.

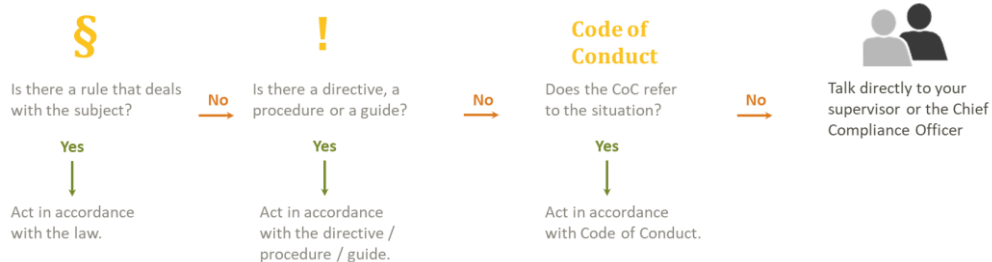
Transporeon reserves the right to review compliance with the requirements of the Code of Conduct. Transporeon encourages its contract partners to introduce their own binding guidelines for ethical behavior.

Transporeon reserves the right to terminate the contractual relationship with a supplier or contract partner in the event of any breach of the obligations stated in this Code of Conduct.

We are always critical of our own actions. Within Transporeon we react and penalize irresponsible behavior as well as unlawful conduct and policy violations without regard to rank and position of the acting person.

### The right decision in difficult situations

The following illustration explains the process you must follow when you think you are in an ethical conflict.



In case of questions, recommendations, remarks and notifications on incidents please contact:

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