

CODE OF CONDUCT

WALTER GROUP



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Foreword

Together with its companies (see page 14), the WALTER GROUP operates successfully throughout Europe and the world in various branches of business.

Our core business principles include bringing commercial trade into harmony with ethical values and social responsibility.

We aim to offer all customers reliable services and high-quality products that fully meet their expectations. Similarly, our services and products are also intended to correspond to modern day requirements regarding ethical trade, security, conformity with the law, anti-corruption, fair competition and sustainability.

The international nature of our brand requires us to observe legal regulations and business practices in our commercial activity that may vary from country to country.

This Code of Conduct is intended to serve our employees and managers as a guideline for their decisions and commercial actions.

We expect them to observe these principles, to comply with all laws and regulations, and not to abuse the trust placed in us by our suppliers, customers and authorities.

By signing the code, we are obliged to implement and comply unreservedly with the principles of conduct of the WALTER GROUP.

For the WALTER GROUP

Two handwritten signatures in blue ink. The first signature is "A. Höfler" and the second is "G. Ringhofer".

Alois Höfler Günter Ringhofer

Note:

We have avoided gender-specific formulations in this text for the purpose of easier readability. However, in the interests of equal treatment, both genders are always meant and addressed.

1. Principles of our ethical conduct

1.1. Our core values

We respect the personal dignity, privacy and rights of our employees and colleagues as well as our business partners. Our workspaces are free of discrimination based on age, gender, sexuality, health, national origin as well as religious or cultural differences. Our employees are deserving mutual respect in the company.

We reject any form of forced labour and child labour, as well as the exploitation of employees. The minimum age for employment at the WALTER GROUP is usually upon completion of vocational school. Proof of this completion must be demonstrated.

We offer our employees a challenging, communicative and open working environment, which enables them to develop personally and professionally. We also pay attention to the development of social competences. In addition to comprehensive basic training we ensure that employees are able to undertake further subject-specific training.

From our employees we expect loyalty towards the company, a high willingness to perform, as well as the motivation to undertake further personal development.

Environmental protection, health protection and occupational safety are an integral part of our company culture. It is our social and societal responsibility to ensure that we:

- Carry out our activities in an environmentally-friendly manner
- Use resources such as energy and water responsibly
- Use our buildings and properties sustainably
- Offer our employees a risk-free and attractive working environment
- Encourage a healthy lifestyle and social cohesion

1.2. General rules of conduct

The principles of conduct are a fixed part of the WALTER GROUP business culture. Integrity begins with management. Our managers are to communicate the content and significance of our Code of Conduct to employees by means of exemplary personal conduct and social competence, and to help employees implement the same. In acknowledging the Code of Conduct, each employee bears personal responsibility for upholding these principles.

The principles of conduct apply both internally as well as towards our business partners.

Each employee is entitled and invited to report any violations of the Code of Conduct or laws and provisions to their line manager(s), higher-ranking manager(s) (operation management, commercial management, etc.) or head(s) of “shared services” or “services”. They are then obliged to deal with the report in strict confidentiality and look into it with the utmost care and consideration. No employee shall suffer any disadvantage in the company as a result of making a report of this kind.

The WALTER GROUP Code of Conduct is brought to the attention of new employees as part of their training. By signing they agree to comply always with the rules of conduct.

1.3. Compliance with the law

Compliance with the law and provisions in force on a national, European and international level is a basic principle of the WALTER GROUP.

Each employee – regardless of position in the company – is obligated to observe the internal rules of conduct (such as circulars or work instructions) as well as all legal provisions within their field of responsibility, and act accordingly.

The WALTER GROUP legal department must be consulted for any queries regarding legal provisions.

Each employee – regardless of possible civil or penal consequences – must expect disciplinary action in the case of deliberate violation(s) of these basic principles.

2. Conduct in the workplace

In everyday professional life it must often be determined whether a particular action or conduct is appropriate or not.

If an employee must assess a sensitive situation, the following questions may help to make the correct decision:

- Am I acting in accordance with the law?
- Is my action in accordance with the Code of Conduct?
- Am I deciding in the interest of the company or out of personal interest?
- Would my decision stand up to public scrutiny?
- Could my action or decision endanger the reputation of the company?

2.1. Making decisions

Each employee is entitled to make decisions within the framework of their function or position within the company. Their tasks i.e. scope of decision (authority to sign) will be imparted over the course of the internal training and further training programme “Train the Winner”, as well as published on the Intranet in the respective job description.

Furthermore the purchase of goods and services is governed by the WALTER GROUP purchasing policy. An obligatory authorisation procedure as well as a needs assessment stipulate that – depending on the amount of the order – two or three authorisations have to be obtained (second set of eyes or third set of eyes).

2.2. Documenting business processes

Each business process (e.g. transport order, supplier order, customer order, etc.) must be documented fully and properly in accordance with internal processes as well as legal provisions.

2.3. Observing the credit limit

An internal credit limit is agreed for every customer by the finance department as part of a credit rating process. Potential interested parties or new customers must be disclosed to the finance department through a „credit rating enquiry“ and a credit limit must be applied for them.

Orders may only be accepted if they are covered by an available customer credit limit. Should the credit limit be exceeded, the finance department must be consulted before accepting the order and the next steps must be agreed. If no credit limit can be granted, orders may only be processed if appropriate securities are provided (prepayment, bank guarantee, etc.).

Non-observance of this agreement is considered to be a deliberate violation of company interests.

2.4. Consumption of alcohol and drugs

The consumption of alcohol during office hours including work breaks (in all company premises including restaurants/pubs) is forbidden. In exceptional circumstances moderate consumption of alcoholic beverages (excluding spirits) will be allowed during work breaks:

- To celebrate a promotion or a birthday of a colleague, after prior approval from a supervisor
- To celebrate a special occasion in the company pub, after prior approval from the General Operations Manager/the Board of Directors responsible

Without exception the consumption of drugs is forbidden during office hours and work breaks.

Employees who appear under the influence of drugs and/or alcohol in the workplace will be asked to leave. There will also be disciplinary consequences (formal warning, dismissal in the case of reoffending) for those employees who violate the alcohol and drug rule.

In the interest of your health, we ask you to take responsibility and to avoid regular consumption of alcohol as well as to reject the use of drugs.

3. Avoiding conflicts of interest

WALTER GROUP employees shall always undertake to make their business decisions in the company's interest, not based on possible personal interest.

A conflict of interest arises if a decision that would be best for the company stands in opposition to personal or private interests and can therefore no longer be made impartially. In this case, affected employees are obliged to consult their line manager(s), higher-ranking manager(s) or head(s) of „shared services“ or „services“.

There is also a conflict of interest when invitations or gifts exceed the usual business boundaries.

In order to prevent conflicts of interest, WALTER GROUP employees are strictly forbidden from carrying out competing activities or business.

4. Dealing with external partners

4.1. Fair and respectful conduct

We always treat customers, suppliers and authorities fairly and respectfully.

4.2. Fair competition

We are committed to fair competition by adhering to competition law as well as the antitrust law. For our employees this means consultations/agreements with competitors, in particular as regards prices, capacities, submitting bogus bids or non-competition are strictly forbidden. We expect our business partners to also ensure fair competition on their own responsibility.

The services of our suppliers and transport partners are paid promptly and in line with the market in order to guarantee that their employees will be paid accordingly and conforming to the law.

4.3. Anti-corruption

We want to acquire our customers exclusively through the quality of our products and services.

All employees are therefore strictly forbidden to promise or give monetary payments, inappropriate gifts, other advantages or preferential treatment to a third party that (may) make the WALTER GROUP company anti-competitive.

By third party, we mean in particular suppliers, customers, authorities, lobbyists and private individuals.

Similarly employees are not permitted to gain advantages from their position in the company.

Non-observance of this stipulation is considered to be a deliberate violation of company interests.

4.4. Giving and accepting gifts

Accepting or requesting inappropriate gifts, financial donations, provisions as well as any other advantages or favourable benefits is strictly forbidden. Fundamentally, gifts or invitations originating from our business decisions must not be used to influence. They must be appropriate to our business activity, must not violate any law in force and must comply with the general market practices of the industry or country.

Non-observance of this stipulation is considered to be a deliberate violation of company interests.

4.5. Donations and sponsoring

For decades, the WALTER GROUP has been supporting recognised social facilities and organisations with considerable donations.

Selectively aided are:

- Social institutions, associations and social projects in local communities as well as in the Vienna and Kufstein area
- Vocational schools, colleges and universities
- Local sport and cultural events
- Local initiatives in local communities (children, young people, senior events)

Furthermore, WALTER GROUP employees in emergency situations are also supported.

No donations are issued to political organisations, parties or individuals.

The decision regarding donations and sponsorship is made exclusively by the managing board.

5. Dealing with company property

Our employees are encouraged to use company property such as office spaces and operating premises, office facilities, garages and car parks, all technical appliances such as computers, telephones, photocopiers, printers, software and other work facilities such as company cars, mobile phones or fuel cards carefully and exclusively for company purposes. Private use of technical facilities and work appliances is permitted within reason and in accordance with Austrian trade usage and custom.

6. Handling information, data security and data protection

All employees shall undertake to carry out an open, truthful and full exchange of relevant work information and knowledge in the company. This excludes information that is subject to strict confidentiality.

We encourage our employees to bring up subjects or concerns in this context openly, without having to fear sanctions.

The pledge to be discreet applies to trade secrets as well as confidential information. These must be used exclusively for business purposes and not forwarded to third parties. This obligation also applies upon termination of the employment contract.

The WALTER GROUP handles employee data as well as customer and supplier data in strict confidentiality and with the greatest possible care and diligence.

We capture and use customer and supplier data exclusively in order to process our customer orders reliably – as per requirements. Data is gathered based on legal provisions.

The WALTER GROUP data centres are equipped with an access control, and are protected to the highest possible state-of-the-art standard with burglar-proof doors, thick concrete, electrostatically dissipative floor coverings, early fire detection and gas extinguishing systems, a redundant electricity supply and air conditioning. Two separate data centres with parallel running systems ensure a failsafe implementation of customer orders as far as possible.

Legal provisions regarding data protection are upheld when processing data.

Each employee is obliged to comply with data protection stipulations as well as the internal data security regulations.

7. Health and safety at work

Safety in the workplace is an integral part of our social responsibility. For this reason, we ensure that our employees are offered a safe, healthy and secure working environment and that the respective instructions relating to work safety, health, fire protection and environmental protection as well as customer-specific safety requirements are correctly maintained.

Each employee is co-responsible for upholding these guidelines in their working sphere.

As part of a continual process of improvement, we aim to constantly improve our employees' workspaces as well as boost job satisfaction and health at work by using preventative and health-promoting measures.

Together with our customers we care for a safe working environment for the drivers at all loading and unloading places.

With manifold prevention measures such as driver training or our driver handbook we contribute to safe driving, safe parking of the vehicles during legal rest periods for drivers (theft prevention) as well as to correct behaviour in emergency situations.

8. Environment

An essential goal of the WALTER GROUP was and is to design all business activities in such a way that the environment is polluted as little as possible.

With the environmental initiatives “GREEN transport” by LKW WALTER and “GREEN technology” by CONTAINEX, the WALTER GROUP has placed considerable emphasis on reducing harmful emissions in its core businesses “transport” and “container trade and production”.*

Within the framework of our environmental management, we ensure that we deal responsibly with resources such as energy and water and make sustainable use of our buildings and properties. A series of measures at our sites – such as the environmentally-appropriate procurement of products and services, optimisation of energy consumption by means of our building management system, as well as energy and emissions control – ensure that we can continually improve our procurement and work processes, in accordance with our ecological responsibilities.

** Detailed information on this can be found in the LKW WALTER company report or the CONTAINEX SHEQ report.*

WALTER GROUP



International transport organisation for full truck loads (FTL) all over Europe



Europe-wide trade with containers, Container supply-depots all over Europe



Office and warehouse rental



Your warehouse in the south of Vienna



Truck & Trailer
View – Select – Take it!



Investment in stable value property (residential and commercial property)

