

CODE OF CONDUCT





“ As an entrepreneur, my contribution to sustainable, economic success is to attract the best talent from all over Europe for our company. We started out as a small family business – today we are a big family tasked with making a sustainable contribution to economic prosperity and social cohesion, in harmony with nature and the environment. ”

Excerpt from a speech by our company founder

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Board of Directors of WALTER GROUP – from left to right: Christoph Pernsteiner, Günter Ringhofer, Alois Höfler and Christian Bernegger

Foreword

The WALTER GROUP and its companies operate successfully throughout Europe and around the world in various lines 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 should also correspond to modern day requirements regarding ethical trade, sustainability, security, conformity with the law, anti-corruption and fair competition.

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

This Code of Conduct should serve our employees and managers as a guideline for their decisions and commercial actions. We expect that they observe these principles, comply with all laws and regulations and not betray the trust that our suppliers, customers and authorities place in us.

We also expect our business partners to respect this Code of Conduct and to behave in accordance with the requirements.

By signing the code we commit ourselves to implementing and unconditionally complying with the principles of conduct of the WALTER GROUP.



A handwritten signature in blue ink, appearing to read "Ch. Bernegger".

Christian Bernegger

A handwritten signature in blue ink, appearing to read "A. Höfler".

Alois Höfler

A handwritten signature in blue ink, appearing to read "Christoph Pernsteiner".

Christoph Pernsteiner

A handwritten signature in blue ink, appearing to read "G. Ringhofer".

Günter Ringhofer

1. Principles of our ethical conduct



1.1. Our core values

We respect the personal dignity, privacy and personal rights of our employees 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. Everyone in the company deserves mutual respect.

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 provided.

We offer our employees a challenging, communicative and open working environment, which enables to develop personally and professionally. In doing so 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.

We expect loyalty to the company, a willingness to perform, as well as the motivation for further personal development. We also assume a service mentality and a willingness to communicate internally and externally, which ensures the quality-compliant implementation of the tasks in our business divisions service, trade and production.

Environmental protection, health protection and occupational safety are an integral part of our company culture. It is our social and corporate 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 starts at management level. 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. 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 requested to report any violations of the Code of Conduct or laws and regulations to their line manager (e.g. operations management, commercial management, sales management or head 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 always comply with the rules of conduct.

1.3. Compliance – abidance by the law and by the rules

According to today's understanding compliance basically stands for acting in accordance with existing law, calculation of taxes conformable to law and their payment on the due date, data protection as well as for adherence to internal guidelines and rules of conduct.

With this Code of Conduct the management board of the WALTER GROUP determines appropriate measures in order to ensure the compliance of all group companies and their employees.

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 violations of these basic principles.



2. Conduct at 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 advanced training programme “Walter Academy”, as well as published on the Intranet in the respective job description.

Furthermore, the purchasing of goods and services is governed by the purchasing regulations of the companies within the WALTER GROUP as well as the GZA and GZAM (= principles of cooperation between transport and assembly partners). 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 granted by the shared service finance for every customer as part of a credit rating process. Potential interested parties or new customers must be disclosed 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 next steps must be agreed with the shared service finance before accepting the order. If no credit limit can be granted, orders may only be processed when appropriate securities are provided (prepayment, bank guarantee or default liability).

Failure to comply with this stipulation is considered to be a deliberate violation of company interests.

2.4. Consumption of alcohol and drugs

In the interest of your health, we appeal to everyone to take personal responsibility and to avoid regular consumption of alcohol as well as to reject the use of drugs generally.

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.

3. Avoiding conflicts of interest



WALTER GROUP employees shall always undertake to make their business decisions in the company's interest and 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 (e.g. opera-

tions management, commercial management, sales management or head 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 engaging in 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 or submitting bogus bids at tenders 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 and partners 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 in order to give preference to the WALTER GROUP anti-competitively.

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. As a matter of principle gifts or invitations originating from our business decisions must not influence our business decisions. 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. Furthermore 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, elderly people 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.

4.6. Involvement of our business partners

We expect our business partners to comply with the values of the WALTER GROUP with regard to ethical behaviour, safety, legal compliance, anti-corruption, fair competition and sustainability and to comply with the Code of Conduct.

Compliance with applicable laws and provisions at national and international level is a basic requirement for working with the WALTER GROUP. This includes observing and fulfilling employment contracts, statutory minimum wages and occupational health and safety.

5. Health and safety at work



Safety at 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 business partners we ensure a safe working environment for the workforce and external staff at all workplaces.

With a wide range of preventive measures such as safety training, driver training or our driver handbook we contribute to a safe working environment at the



workplaces as well as safe driving, safe parking of vehicles during legal rest periods for drivers (theft prevention) and correct behaviour in emergency situations.



6. 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 responsibly deal 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, the construction of PV systems and e-charging stations, optimisation of energy consumption by means



of our building management system, as well as energy and emission 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.*

7. 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, photocopying machines, printers, software and other work equipment 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.

8. 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 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 the data of its company employees and business partners with the greatest possible care and confidentiality.

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

Two separate data centres with parallel running systems ensure a failsafe implementation of customer orders as far as possible. Legal provisions regarding data protection (GDPR) are upheld when processing data.

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



9. Whistleblower system – We care



“ It takes 20 years to build a reputation and five minutes to ruin it.
If you think about that, you’ll do things differently. ”

Warren Buffet

Misconduct concerns us all. Violations of compliance can cause material damage to our companies and damage the reputation of the WALTER GROUP strongly.

For that reason the WALTER GROUP has implemented **“We care”**, a high-security web-based communication platform on which employees, business partners and third parties can anonymously report information on suspected illegal and abnormal behaviour. Such as:

- **White-collar crime, corruption**
- **Conflicts of interest, breach of trust**
- **Theft, fraud, sabotage, betrayal of business and company secrets health and safety standards, environmental protection**
- **Employment protection, human rights, discrimination**
- **Data protection, data abuse**
- **Other offences as well as violations of the Code of Conduct**

This also applies to our cooperation with third parties in order not to be affected by offences by external partners against the compliance requirements of the WALTER GROUP,

Our compliance team checks every report with the departments concerned and determines suitable measures in coordination with the department management or the general management if necessary.

The identity of the whistleblower is kept strictly confidential. The externally hosted and operated communication platform gives all whistleblowers the security that the sending address (or IP-address) cannot be tracked and that all reports therefore remain anonymous.

The executive board of the WALTER GROUP encourages all employees to protect the corporate group from grievances and rule violations or to report grievances.



<https://waltergroup.secureveal.com>





Group headquarters Vienna/Wiener Neudorf

WALTER GROUP COMPANIES

LKW WALTER

The European Transport Organisation

CONTAINEX

Create space with moduls and containers

WALTER LEASING

Truck & Trailer Center Austria

WALTER BUSINESS-PARK

Your location to feel good in

WALTER LAGER-BETRIEBE

Competence in warehousing

WALTER IMMOBILIEN

Values for the future
