

VALUES & CODE OF CONDUCT

YOUR CONTACTS

If you have any concerns, or would like some further information, please use any of the following means to contact Head of Compliance.

Head of Compliance

Compliance E-mail

E-mail: compliance@edelweisslogistics.com

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This Document records our beliefs and values and sets down our commitment to honesty, integrity and the promotion of an open and diverse corporate culture. It also sets down the key commitment that we must at all-time maintain high ethical standards wherever we conduct our business. We also have to comply with legal requirements places upon us in an era of extra-territorial laws that extend the jurisdiction in one country beyond its own geographical borders.

This document sets out both what you can expect from Edelweiss Logistics – our values and also what Edelweiss Logistics expects from you as a company employee – our code of conduct. The code provides guidance on what to do when confronted with issues which may arise in your work.

This document also supports our efforts to create an open, constructive, and efficient working environment where people feel confident to raise concerns and to seek advice.

The code applies to every one of us and following the code is mandatory for everyone working for Edelweiss Logistics with no exceptions. We are all accountable for upholding the requirements of this code as company reputation and our future business depends on each of us.

I am committed to ensuring that we are at all times fully aware of our obligations and as a result I will ensure my staff gets clear updates on any changes in our compliance regime and that appropriate training is provided where it is necessary.

Should you have any questions after reading this document please don't hesitate to contact head of compliance details of which provided on page 1.

Best Regards

Managing Director

Promote a fair working environment

Edelweiss is committed to providing a working environment for its entire staff that is comfortable and free from all forms of bullying and harassment. The company adopts a zero-tolerance approach towards bullying and harassment and any employee who is found to have harassed or bullied a colleague will be subject to disciplinary action, up to and including summary dismissal.

Promote diversity

We respect our individual abilities and actively promote tolerance and diversity. We recognize and promote creativity and the benefits to be gained from drawing upon the experience and knowledge of people from all parts of the world.

Promote a safe working environment

Edelweiss is committed to providing all employees with safe and secure working environment. Each employee has the responsibility to maintain a safe and healthy workplace by ensuring that all applicable safety rules and practices are followed. Violence and threatening behavior will not be tolerated. Likewise working under the influence of alcohol, drugs and substances will not be accepted at any time.

Promote a secure working environment

Edelweiss will ensure that appropriate measures are taken to protect its employees.

Promote a learning environment

Edelweiss understands that its employees will want to develop their careers with the company and it is company's policy to announce vacancies within the company first. Employees are encouraged to apply to vacant posts if they have appropriate qualifications, skills, and experience.

Promote social responsibility

Edelweiss understands that as a local employer we have a social responsibility to the communities where we do our business. This responsibility extends to providing employment opportunities to local people, through to the purchase of goods and services from local suppliers.

Complying with this code of conduct

Every Edelweiss employee must comply with the rules and principles set out in this code. Failure to follow the code will cause disciplinary action, which could even lead to dismissal in some circumstances. Furthermore violations of this code may also be violations of the law and may result in severe civil and criminal penalties.

Complying with anti-corruption laws and regulations

In order to follow the company's policy on preventing bribery and corruption, Edelweiss requires all of its employees to be aware of and to comply with the laws of various countries designed to prevent bribery and corruption. These include but not limited to US Foreign Corrupt Practices Act, UK Bribery Act, and other applicable local laws and regulations.

Policy Statement

No Edelweiss employee shall, either directly or indirectly, offer, make, promise, approve or authorize the making of any prohibited payment to a Government Official or someone in private business. Likewise it is a violation of this code to accept, seek or receive a prohibited payment.

No Edelweiss employee shall, either directly or indirectly, offer, make, promise, approve or authorize the making of any payment to a person or entity if in doing so you know or have any reason to believe that the person or entity receiving payment will, directly or indirectly, offer, make, promise, approve or authorize the passing of any such prohibited payment to a Government Official or someone in private business.

No facilitation payments or any other payments for routine governmental action shall be made on behalf of Edelweiss.

Prohibited payment means any offer, gift, payment, promise to pay, or authorization of the payment of any money or anything of value, including charitable contributions, directly or indirectly, to a Governmental Official, political party or to a third party if one knows or has reasonable grounds for believing that all or a portion of the money or thing of value which was given or is to be given to the third party will be paid, offered, promised, given or authorized to be paid, directly or indirectly, to a Government Official or political party, for the purpose of:

- Influencing any decision of a Government Official
- Inducing Government Official to do or omit to do any act in violation of his or her lawful duty
- Securing any improper advantage

- Inducing Government Official to use his or her influence any act or decision in order to assist in obtaining or retaining business or in directing business to any party.

Complying with export regulations and trade embargoes

Edelweiss is required to determine whether the freight we are moving for a client requires a license. We are also required to research the end use of the product we are moving. We must perform due-diligence to ensure that the necessary checks are conducted in advance to establish if a license is required or a shipment is prohibited, because:

- Of the destination of the product or transit countries
- The type and nature of the cargo being moved
- The person(s) or company (ies) we are moving cargo for

In addition to the restrictions on the exporting of certain items a number of countries and the United Nations from time to time impose restrictions on exports to or the movement of freight through certain countries, entities and by certain individuals, companies and organizations.

Maintain Confidential Company Information

Confidential client, project information and intellectual property is one of the company's most valuable assets and should be treated accordingly. Edelweiss expects that you will not, without the prior written permission of the company during your employment, or at any time after you leave Edelweiss to either disclose or allow to be disclosed or use any confidential information concerning the business dealings, affairs or conduct of Edelweiss or any of its employees, client or business partners nor to allow intellectual property to be compromised.

Correct use of company property

Edelweiss provides its employees with the necessary equipment, processes and software to allow them to do their jobs and expects them to properly use the company's property. It is the policy of Edelweiss that e-mail use while at work should be solely related to the legitimate business purpose.

Ensure you attend work in a fit and proper state

Edelweiss is committed to ensuring the health, safety and welfare of its employees. It will take all reasonable steps to reduce and eliminate the risk of injuries or incidents occurring due to individuals suffering from the effects of alcohol or substance abuse. The consumption of alcohol or non-prescribed drugs during working hours is violation of this code.

VALUES AND CODE OF CONDUCT

ACKNOWLEDGEMENT OF RECEIPT FORM

Please, return this signed form to Head of Compliance.

I acknowledge receipt of copy of Edelweiss value and code of conduct

(tick here)

Supplier Name

Position

Signature

Date Signed

Office

Country