



Fracht GROUP

Code of
Conduct



A Word From *our* Owner

Ruedi Reisdorf



Dear Friends,

The Fracht Group is a family owned freight forwarding company founded in Basel, Switzerland in 1955 by Mr. Rudolf Reisdorf Senior, and is run now by undersigned Mr. Rudolf Reisdorf in the second generation. Since the beginning of our company our highest values are the integrity and respect for humans, animals and nature. We want to be a human and humanitarian company and the present Code of Conduct explains the standards for our ethical behavior and contains the tools and policies, that support our strategies and work. We consider us as a family, where trust and partnership are just normal behavior and if we may say it in French, “liberté, égalité, fraternité”, it really fits our philosophy and for our standards and we match it with the Brazilian “ordem e progresso”. Fracht is here to serve your logistical needs the family way.

Many thanks for your patronage.

Best Regards,

Ruedi Reisdorf



Our Code of *Conduct*

This Code of Conduct is a statement of Fracht's commitment to uphold the highest ethical standards. This Code defines the standards of conduct that we expect from all of our employees and guides us to make the right decisions when performing services for our clients and when choosing our vendors. Additionally, Fracht's sustainability strategy focuses on integrating Environmental, Social and Governance considerations across our business, and we have pledged our support to the United Nations Sustainable Development Goals.

Every employee is responsible for understanding and abiding by this Code. This Code and our culture are founded in Fracht's core values, Mission Statement and Vision Statement.

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Fracht

What We Stand For

FRACHT MISSION STATEMENT

We are one global family. The heart of our business is upheld by hand-picked professionals who are devoted to meeting our customer's needs by providing the highest quality service and operational excellence. We deliver strategic and innovative solutions in every direction.

FRACHT VISION STATEMENT

Through innovation and a commitment to service excellence, Fracht will help design, implement and service your supply chain of today into the future.

CORE VALUES

- RESPECT:** We treat everyone with respect.
- INTEGRITY:** We believe in a moral compass.
- PASSION:** We demonstrate perseverance and determination.
- POSITIVITY:** We exemplify gratitude and appreciation towards all.
- LEADERSHIP:** We promote self-growth.
- EMPATHY:** We care about people.

FRACHT CULTURE

At Fracht, we are committed to maintaining a culture based on our core values: Respect, Integrity, Passion, Positivity, Leadership and Empathy. Living these values means, conducting ourselves and our business activities in accordance with the letter and spirit of applicable laws and regulations and Fracht policies, and acting with integrity in everything we do.

Working Together Standards

DIVERSITY & INCLUSION

Fracht is committed to providing a work environment that promotes diversity, equity, and a culture of inclusion, where every employee, client and vendor is treated with dignity and respect. Our practices and policies promote equal employment opportunity without discrimination or harassment on the basis of non-work related personal characteristics such as race, color, religious beliefs, age, gender or transgender, gender identity or expression, sexual orientation, national origin, ethnic origin or background, physical and mental disability, medical condition, marital and civil partnership or union status, pregnancy, social origin, veteran or military service status, genetic information or any other characteristic protected by law.

It is the policy and practice of Fracht to maintain and foster a working environment based on trust and mutual respect. Accordingly, Fracht has adopted a zero-tolerance policy toward discrimination and all forms of unlawful harassment, including but not limited to sexual harassment. This zero-tolerance policy means that no form of unlawful discriminatory or harassing conduct towards any employee, client, contractor, or other person in our workplace will be tolerated. Fracht is committed to enforcing its policy at all levels within the Company, and any employee who engages in prohibited discrimination or harassment will be subject to discipline. Physical, sexual, mental or physical abuse is prohibited as is any threat of abuse or any other form of intimidation.

HUMAN RIGHTS

With our compensation and benefits we aim to provide an adequate standard of living for our employees and their families, guided by the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy. We foster a work environment where each of us can perform best, innovate and develop. We encourage our employees to fully utilize their potential by offering ample development opportunities and supporting a feedback culture throughout the Company. We follow a clear 'zero tolerance to child labor' policy in our business operations worldwide. Our efforts to fight child labor are consistent with the ILO's (International Labor Organization) core labor standards and the United Nations Global Compact principles. Additionally, all forms of forced and compulsory labor are strictly prohibited. We comply with all applicable laws and agreements on working time and paid leave.

Fracht recognizes the importance of supporting human rights globally as set out in the International Bill of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We are committed to implementing the United Nations Guiding Principles on Business and Human Rights (UNGP), as well as the OECD Guidelines for Multinational Enterprises. We respect and promote human rights in our operations, business activities, business relationships and in the communities where we work. It is our corporate responsibility to act responsibly and to identify, prevent, and mitigate any adverse human rights impacts where they may occur. Our principle is that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

FRACHT WORK ENVIRONMENT

Protecting the well-being and supporting the actions of our employees are key to the success of Fracht. Fracht prides itself on providing a safe and healthy workplace by creating appropriate work conditions that meet all relevant legal requirements, create job satisfaction, and prevent illness and injury related to unsafe work practices and risks.

Our Corporate Responsibility Standards



HEALTH AND SAFETY AT WORK

The health, safety and well-being of our employees are top priorities for Fracht. We place great importance on compliance with our occupational health and safety policies and with legal regulations and industry standards. Fracht management's objective is to maintain a safe and healthy workplace with a zero accident and injury rate. To achieve this target, management maintains a proactive and open-door approach to the health and safety of all staff, contractors, clients, visitors, suppliers, and other interested parties. Furthermore, management takes all necessary steps to ensure tasks performed on its premises are as risk-free as possible. Fracht has a zero-tolerance policy regarding substance abuse. The unlawful or unauthorized use, abuse, solicitation, distribution, theft, possession, transfer, purchase, or sale of drugs, drug paraphernalia or alcohol by an individual anywhere on Fracht premises, or while conducting Fracht business, or while representing Fracht, reporting to work, leaving work, or remaining on duty after using drugs or alcohol in any amount that adversely affects the employee's ability to perform the functions of the job, is strictly prohibited. Suspected substance use or possession should be reported to the HR Department immediately.

CORPORATE COMPLIANCE

Fracht is committed to the highest standards of ethics and compliance. Our Compliance Program represents our commitment to high standards of corporate conduct and integrity. Compliance with laws, regulations, standards, and ethical practices is mandatory at Fracht. Fracht's Compliance Team works diligently to ensure that all of Fracht's employees are well-versed and fully trained in all programs that affect our business.



Our Corporate Responsibility Standards



Fracht Group supports the UN Sustainable Development Goals



ENVIRONMENTAL AND CLIMATE PROTECTION

- Fracht has pledged our support to the United Nations Sustainable Development Goals. At Fracht, aligning with the 17 UN SDGs, protecting the environment, and preserving its resources are corporate goals of the highest priority. Our mission is to leave a lasting impact on our communities through philanthropic and volunteer efforts that contribute to the creation of a brighter future for our world. A globally implemented environmental management system ensures compliance with laws and regulations and guarantees that Fracht is held to the highest standards.
- Fracht's environmental commitment extends to working collaboratively with our clients and suppliers. We strive to execute innovative solutions for our clients that address complex sustainability issues and provide positive long-term benefits for the environment.
- Environmental impacts are a core function at Fracht and considered in every business activity. By evaluating environmental risks associated with each shipment we strive to maintain zero recordable hazardous spills or non-conformances. Fracht's policies and procedures establish a robust framework for assessing these risks.

Our Standards for

Business Activities

ANTI-CORRUPTION AND ANTI-BRIBERY

Anti-Corruption and Anti-Bribery adherence are of the upmost importance to Fracht. We expect all of our officers, employees, and agents to conduct business in accordance with the high standards of ethical behavior and honesty.

Bribery comes in various forms beyond cash payments such as gifts, travel, entertainment, or any other gratuitous advantage. Fracht will not engage in any form of giving or receiving and expressly prohibits its officers, employees, and agents from engaging in any form of bribery. The prohibition also applies to any contributions or payments made through consultants, suppliers, or other third parties on behalf of Fracht.

Most countries have adopted laws prohibiting bribery, such as the 1977 United States Foreign Corrupt Practices Act ("FCPA"), the 2010 UK Bribery Act, the 2014 Brazil Clean Company Act, the 2011 Chinese Criminal Code, the 2013 Russian Anti-Corruption Law, and the Anti-Corruption French law 2016 ("Sapin II"). Violations of anti-bribery laws can lead to costly enforcement actions and harsh criminal penalties against companies and the individuals involved.

Violations of Fracht's Anti-Corruption and Anti-Bribery policies undermine Fracht's core values and business purpose. Such violations also subject Fracht and its employees to both civil and criminal penalties, including jail time. Every officer, employee and agent is responsible for carefully reading and understanding these policies and to ensure compliance with every aspect of its requirements.

GIFTS, HOSPITALITY AND OTHER BENEFITS

Fracht is committed to competing solely on the merit of our services. We strive to avoid any actions that create a perception that favorable treatment of outside entities by Fracht was sought, received, or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Fracht currently does or may do business with, in the future. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Fracht or customers, or would reflect negatively on Fracht's reputation.

We may accept occasional meals, refreshments, entertainment, and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Our Standards *for* Business Activities

CONFLICTS OF INTEREST

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Fracht may conflict with our own personal or family interests. We owe a duty to Fracht to advance its legitimate interests when the opportunity to do so arises. We must never use Fracht's property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Fracht.

Conflicts of interest may arise in the following circumstances:

- Being employed by, or acting as a consultant to, a competitor or potential competitor, supplier, or contractor, regardless of the nature of the employment, while employed with Fracht.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for an outside commercial company or organization that is a direct or indirect competitor or does business with Fracht.
- Owning or having a substantial interest in a competitor, supplier, or contractor.
- Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor, or supplier, unless equally available to all Fracht employees.

FREE COMPETITION

Fracht is committed to promoting free, fair, and competitive markets. All business must be conducted on the basis of free enterprise and open competition. Fracht will not tolerate any attempt by an officer, employee or agent to impede fair competition practices. All third parties engaged by Fracht are carefully vetted and used only after fair assessment. All business decisions are made in the best interests of Fracht in avoidance of any violations of antitrust laws.

CONTRIBUTIONS TO POLITICAL CANDIDATES, POLITICAL PARTIES, ETC

When representing Fracht employees shall not engage in any political activities including, but not limited to providing support to political elections, campaigns, specific parties, organizations or politicians. Fracht's funds, property or services shall not be used to support political purposes.

WORKING WITH SUPPLIERS

See Fracht's Supplier Code of Conduct

Our Standards for Business Activities

CUSTOMS, EXPORT CONTROLS AND SANCTIONS

It is the policy of Fracht not to ship any product contrary to the United States export laws. No transactions are to be conducted by or on behalf of Fracht contrary to U.S. export control laws and regulations, including those regulations described in the Export Administration Regulations (EAR), the International Traffic in Arms Regulations (ITAR) and the Office of Foreign Assets Control (OFAC). Additionally, Fracht vows to uphold similar sanctions programs imposed by other governments and supra-governmental organizations such as: the United Nations Security Council and the Council of the European Union, prohibit you from engaging in or facilitating, directly or indirectly:

- any unauthorized transactions or dealings with any “blocked” or otherwise sanctioned government, entity, security or individual.
- any unauthorized financial transactions involving, or provision of financial services to, any embargoed country, territory, or region.
- any transaction or activity that is designed to, or does, evade or avoid applicable sanctions or the Fracht’s sanctions compliance controls.

In the interest of responsible and ethically sound business practice, we always act in accordance with legal regulations and international conventions. We comply with applicable laws and regulations on export controls, sanctions and customs clearance in all regions and countries. These relate not only to the movement of goods, they can also have an impact on things such as financial transactions, the use of technology, procurement, or the hiring of personnel.

Do not hesitate to contact the Compliance Department or Legal Department immediately if you have any questions, legal uncertainties or suspicions arise.

ANTI-MONEY LAUNDERING

Fracht is committed to complying with anti-money laundering and anti-terrorism laws throughout the world. Fracht will conduct business only with reputable clients, agents and suppliers that are involved in legitimate business activities with funds derived from legitimate sources. Employees are to collect and understand documentation about their business partners to ensure that they are involved in lawful business activities and the funds are of lawful origin.

Fracht employees are trained to run checks on all companies prior to forming any business relationship and ensure that reasonable steps are taken to prevent and detect unacceptable and suspicious forms of payment.

ACCOUNTING AND REPORTING

We create, retain, and dispose of our company records as part of our normal course of business in compliance with all Fracht policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Fracht’s and other applicable accounting principles.

We must not improperly influence, manipulate, or mislead any authorized audit, nor interfere with any auditor engaged to perform an internal and external independent audit of Fracht books, records, processes, or internal controls.

Our Information and Security Management Standards



CONFIDENTIALITY

Integral to Fracht's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers, and other business partners. Some examples of confidential and proprietary information include pricing and financial data, nonpublic customer or vendor information, etc. Ensuring that such information is kept confidential is key to Fracht's success with its business partners.



DATA PROTECTION

Our cybersecurity procedures include recovery procedures for IT systems and data. Local servers are backed up and are managed by our Managed Service Provider (MSP). Backups are saved in the cloud environment.

Cloud Environments have built in redundancy to help protect against any loss of data. All sensitive and confidential data is stored in an encrypted format.

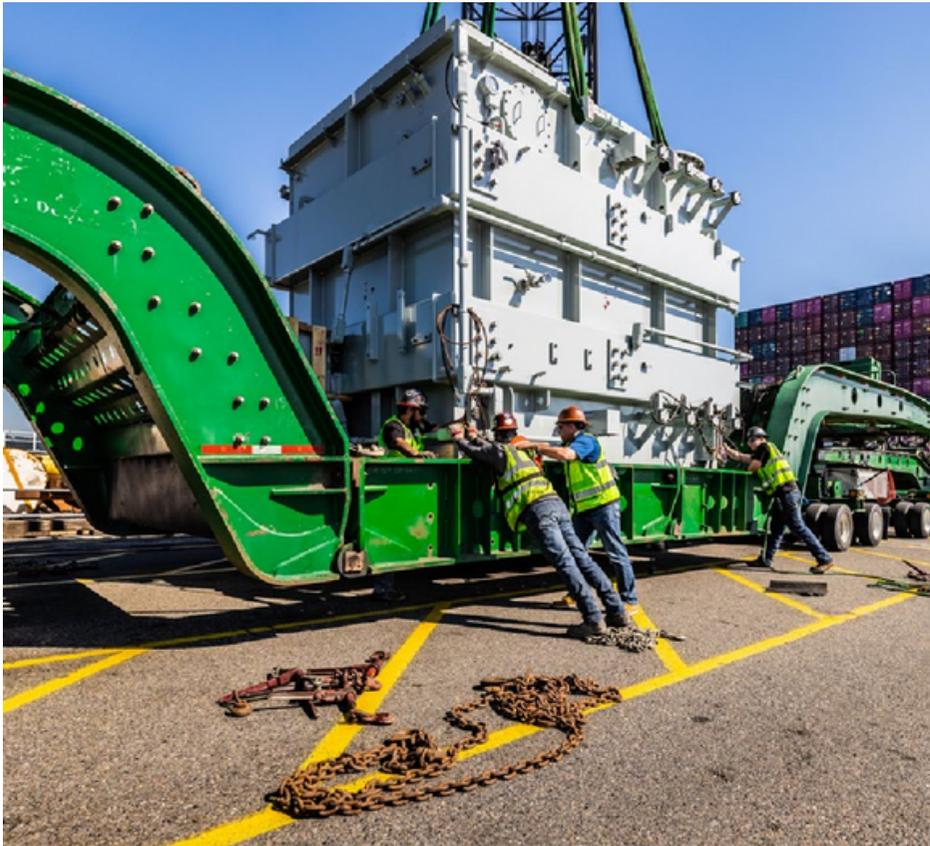


INFORMATION SECURITY

Any company information shared with the government and other business partners is shared on an encrypted format. Fracht is a member of the NCCIC and member of the Iron Scales Anti-Phishing community which utilized AI to prevent and minimize the impact of phishing attacks.

Sufficient software and hardware protections have been installed into the IT system to protect against malware (viruses, spyware, worms, trojans, etc.) and firewalls are also used. Security software is always verified for adequacy and receives regular updates.

Our Information and Security Management Standards



INTEGRATED MANAGEMENT SYSTEM

Fracht is committed to achieving excellence in all aspects of its business. We recognize that understanding the needs of people—customers, employees, business partners, and members of our community—is the foundation of a successful business model. We have implemented measurable objectives and targets. We commit every day to continually improving our system, with the goal of exceeding customer expectations, preventing work-related injuries and illnesses, reducing pollution, and fulfilling the responsibilities set forth in our security and compliance programs.

We promote a culture of security and commit to protecting the supply chain from criminal activities such as drug trafficking, terrorism, human smuggling, and the illegal transport of contraband.

In order to achieve these objectives, it is the policy of Fracht to establish and maintain an effective and efficient integrated management system based upon the requirements of ISO 9001, ISO 14001, and ISO 45001 and all applicable legal, health, safety, and environmental regulations and laws.

The Integrated Management System is documented and periodically reviewed to ensure it remains up-to-date and suitable to govern and continually improve our business operations. Relevant procedures and instructions have been implemented, and adequate resources are provided to maintain the system. Employees are well-informed and have been made aware of their duties and responsibilities in relation to maintaining and improving the system.



CORPORATE SECURITY AND CRISIS MANAGEMENT

Security is our common asset! We provide a safe working environment for our employees and comprehensive protection against security threats and risks for our financial interests and our tangible and intangible assets. Essentially, this involves implementing crime prevention measures to protect our customers' infrastructure, processes, information, and goods, as well as constantly monitoring the global security situation and reviewing our travel security standards. Our crisis management capabilities also help to ensure business continuity even in emergencies.

Ethical behavior and fair business practices are key components for the success of Fracht. All employees of the Fracht Group must deal fairly and honestly with customers, business partners, and competitors. Any manipulation, bribery, fraud, or misuse of confidential or proprietary information is strictly prohibited. The reputation of Fracht is essentially characterized by the appearance, actions and behavior of each officer, employee, or agent. Inappropriate behavior can cause significant and long-lasting damage to the company.

This Code of Conduct is the basis and benchmark for all other guidelines and regulations that ensure responsible and ethically irreproachable conduct within Fracht. Together with the subject matter experts, we regularly review whether the standards set out in this Code of Conduct still meet current requirements, for example due to changing international regulations or legal standards. Any changes to be made to this Code of Conduct are decided by Fracht's Global Board.

Concluding Remarks

REPORTING VIOLATIONS

Any transaction, no matter how small or seemingly insignificant, that may give rise to a violation of this Code of Conduct must be reported promptly to Fracht. Such concerns shall be escalated to an immediate manager, a local HR Department, country management or Compliance.

Your calls, detailed notes, and/or emails will be dealt with confidentially and only by those recipients who have a need to know for the sole purpose of carrying out the necessary investigations and follow-up. As long as a report is made honestly and in good faith, you have the commitment of the Company that you will be protected from retaliation and that your rights will be enforced.

GENERAL INQUIRIES

If you have any questions about the Code of Conduct, please contact us at info@fracht.com

Thank you!

A large, horizontal, light blue brushstroke with a textured, painterly appearance, serving as a background for the company name.

Fracht GROUP