

EHRHARDT PARTNER GROUP

CODE OF CONDUCT



COMPANY PROFILE EPG

SMARTER CONNECTED LOGISTICS

EPG (Ehrhardt Partner Group) is a leading international provider for a comprehensive Supply Chain Execution Suite (EPG ONE™) and employs 1,000 people at 23 locations around the world. The company group provides its more than 1,600 customers with WMS, WCS, WFM, TMS and voice solutions to optimize logistics processes – from manual to fully automated logistics environments.

EPG solutions cover the entire supply chain: From warehouse and road to ground and cargo handling solutions at airports. Logistics consulting, cloud services, managed services and logistics training courses at the company's own academy round out the comprehensive list of solutions from EPG.



WHAT CHARACTERIZES US

Many characteristics define the success of our corporate group today: The development of market-leading software products, the provision and delivery of high-quality services and products, flexibility, speed, creativity, reliability, and a focus on service and the future.

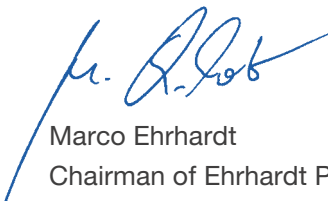
Business success requires more, namely credibility and reputation – in short, the trust of our customers and business partners that for us, business progress and profit do not take precedence over law and ethics, over morality and integrity.

This code of conduct provides a framework for the managing directors, executives, and all employees of the corporate group: On the one hand, for the demand for legal and compliant behavior. On the other hand, for a value system characterized by transparency, respect, and appreciation for all stakeholders, which encourages consistently integral behavior.

The company does not stand alone but maintains diverse business relationships. We expect our business partners to share our values and to adhere to the resulting behavioral requirements together with us.

By living the code of conduct at Ehrhardt Partner Group, we strengthen trust in our corporate group and contribute to the long-term success of the companies.

Best regards



Marco Ehrhardt
Chairman of Ehrhardt Partner Group

PREAMBLE

As EPG, we are aware that with our innovative products we not only have a significant impact on the supply chains of our customers worldwide, but also bear a great responsibility for:

- the people who work with our software and hardware every day,
- our employees, who constantly develop new ideas and put them into practice,
- the society we are a part of,
- the environment, which is the basis for life and health of all people and animals.

Driven by the ambition to optimize the world's supply chains through smart solutions, it is important to us that our own supply chains also live up to the high standards we stand by as a company. EPG is therefore committed to comply with this Code of Conduct, which was inspired by the following guidelines:

- United Nations Universal Declaration of Human Rights
- United Nations Convention on the Rights of the Child
- Convention for the Protection of Human Rights and Fundamental Freedoms ("European Convention on Human Rights")
- International Labour Organization Conventions
- OECD Guidelines for Multinational Enterprises
- General Data Protection Regulation of the European Union (Regulation (EU) 2016/679, GDPR)
- Supply Chain Act of the Federal Republic of Germany



As EPG, we undertake to comply with the respective national and regional laws, regulations and other legal provisions as minimum standards in all countries in which we operate. If EPG's own policies set higher standards than the national law provides, EPG will comply with the higher standards in each case.

We as EPG are also committed to respect and follow this Code of Conduct as an expression of our values and ideals. From the management to the trainee, this Code of Conduct shall be the benchmark of our daily work.

We encourage all our customers and suppliers to share our values with us. As a minimum standard we expect our customers and suppliers to comply with all applicable laws and other legal provisions. We also require our suppliers to adequately comply with the human rights and environmental due diligence requirements set out in the German Supply Chain Act, even if they are not subject to German law.



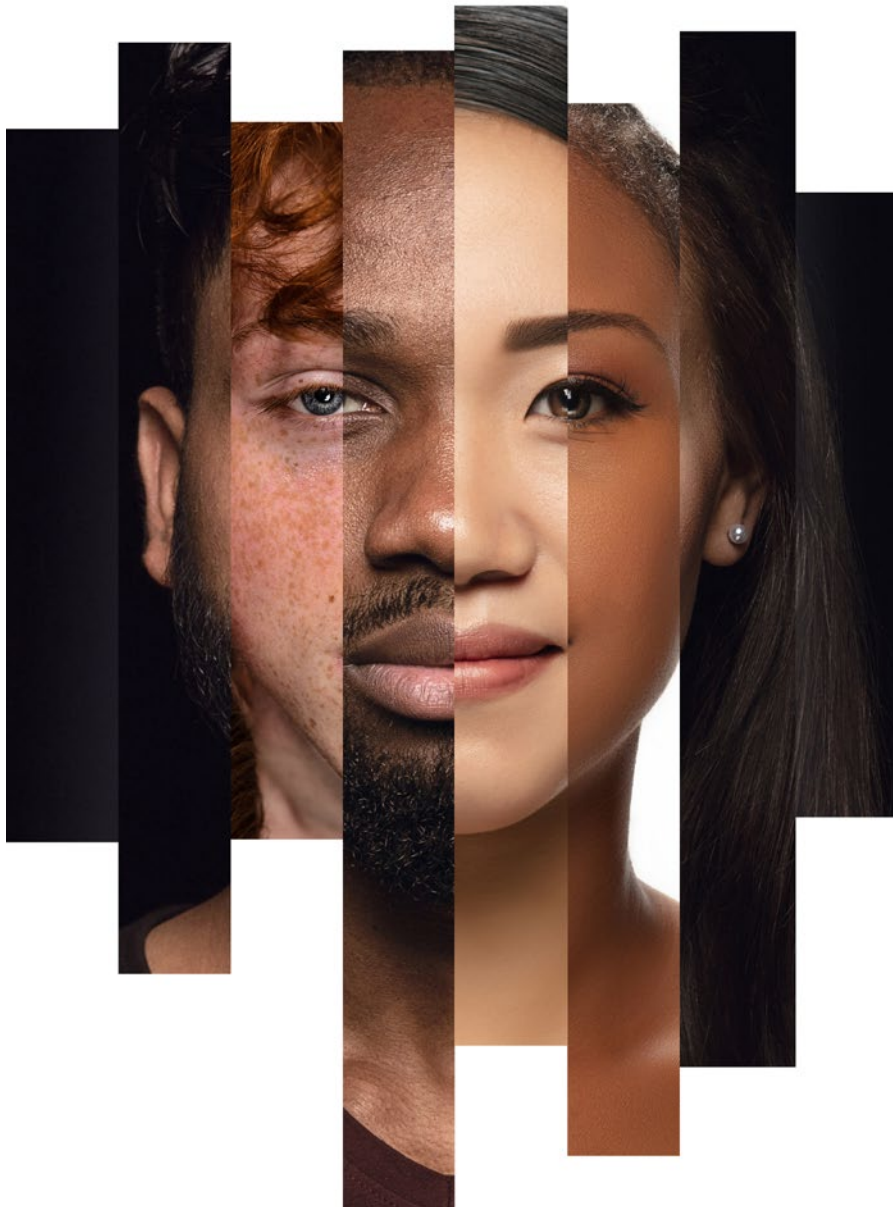
HUMAN RIGHTS

As an international company, we are committed to ensure that all people worldwide, regardless of their origin, are entitled to the rights and freedoms set forth in the United Nations Universal Declaration of Human Rights and the Convention for the Protection of Human Rights and Fundamental Freedoms (“European Convention on Human Rights”).

For us, respect for human rights begins within our own company. Every employee is required to consider the rights of others in his or her daily actions and to report incidents in which the rights of others have been restricted or violated.

As a company, we particularly refrain from measures that unlawfully deprive other people of land and thus their livelihood. This also applies if we would only benefit indirectly from such measures.

As EPG, we do not contract suppliers or service providers who do not respect the human rights.



EMPLOYEES

The satisfaction of our customers and the success of our company depend not only on our products. At least as important are our employees. They are the ones who develop innovative products, support the customer in selecting the right solution, implement solutions at the customer's site, and also provide help and advice afterwards. Not to forget our numerous employees, who are not constantly in the foreground, but nevertheless contribute no less to the success of our company.

Considering the essential importance of our employees for EPG, it is obvious that decent working conditions are the basic prerequisite for excellent work results. Our internal working conditions are therefore in many fields and regions above the legally required labor standards, but in no case below them. If the level of statutory regulations is below our internal standards, we offer our employees the standards that are more advantageous for them in each case.

Occupational safety adapted to the respective work is a matter of course for us, as is the provision of appropriate work equipment to ensure that work is as safe and healthy as possible.

Each employee regularly receives the agreed remuneration, which is based not only on qualification and industry standards but also on the respective location and is in no case lower than the statutory minimum wage.



EPG does not restrict employees' freedom of association, nor does it deny employees the necessary working hours and rest breaks to which they are entitled by law or which are regulated internally, depending on which provision is more advantageous for the employees.

We attach great importance to the continuous training and further education of our employees. Only if the knowledge of our employees is always up to date, so are our products.

It is particularly important to us at EPG that our employees treat each other with respect, not only toward external persons, but above all among themselves.

Every employee is entitled to a working environment free of discrimination. Unequal treatment of people on the basis of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless this is justified in the requirements of employment, is absolutely unacceptable to us. We encourage every employee not to tolerate such behavior, but to stand up resolutely against it.

We strictly oppose slavery and forced labor in any form. Apart from the fact that such practices are incompatible with our view of humanity, we are convinced that coercion and oppression do not provide suitable conditions for creativity and innovation. Suppliers who see this differently are out of the question for us.



CHILD LABOR

Children are an important part of shaping the future. That's why we believe that all children have a right to grow up in an age-appropriate way, to discover the world by playing and to receive the best possible education in order to be prepared for the challenges of tomorrow. At our EPGLinos daycare center, the children of our employees and our neighbourhood have the opportunity to experience this.

Unfortunately, not all children get such opportunities. Child labor, including child trafficking and hazardous work, is still a serious problem in many regions of the world. We therefore reject any cooperation with suppliers who employ children in contravention of the relevant ILO conventions and the UN Convention on the Rights of the Child, or who profit from prohibited practices to the detriment of children. Our rejection of child labor also applies if regional laws permit child labor.



ENVIRONMENT

We are aware of our ecological responsibility as a company and ensure that we play our part to operate in an environmentally friendly and sustainable manner. We are convinced that environmental awareness begins on our own doorstep.

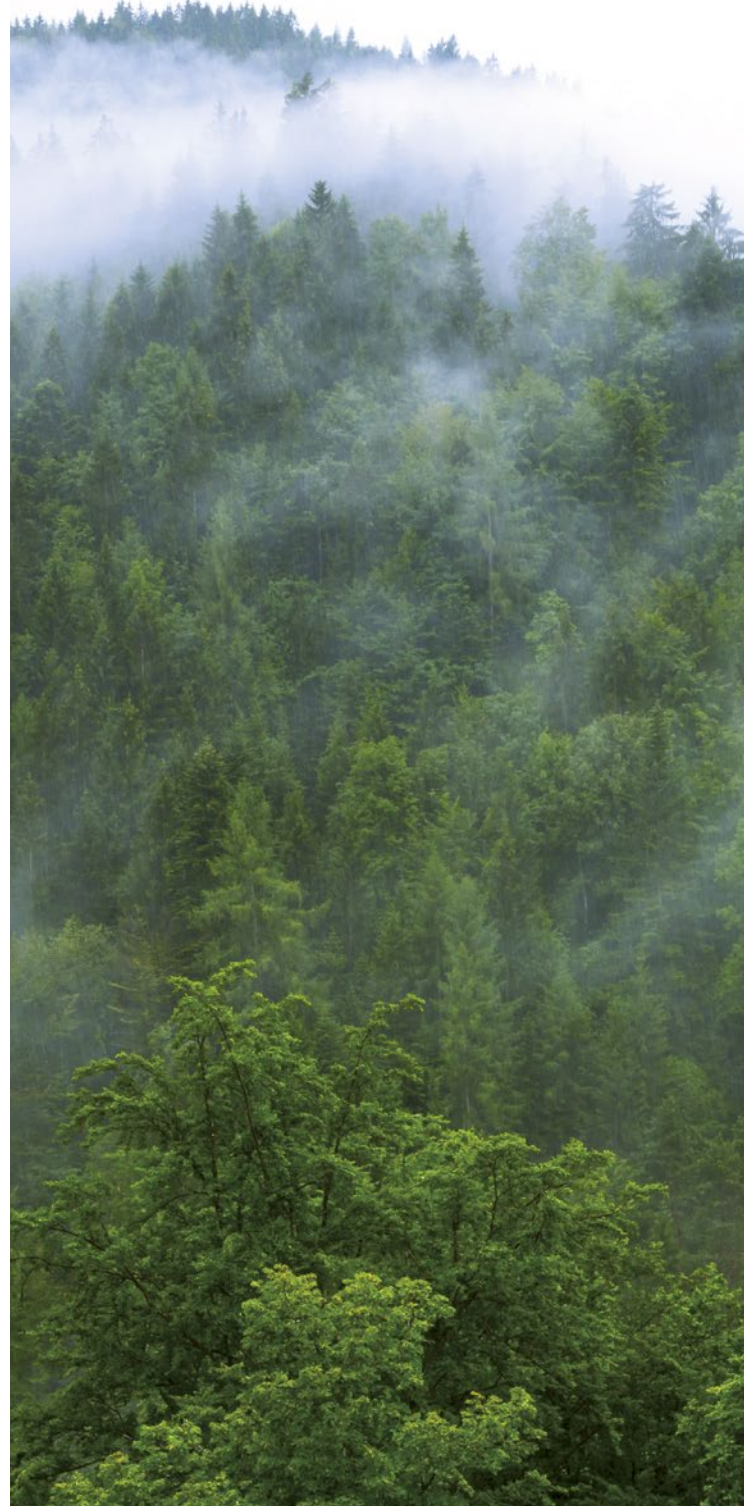
Our environmental policy therefore includes general issues such as waste reduction and separation, reduced paper consumption and the promotion of digitization. Today, the majority of the electricity required in our company buildings is generated by renewable energies, especially solar energy. Nevertheless, we do not yet consider ourselves to have reached our goal here. We intend to further increase the share of self-generated electricity in the future and thus ensure a reduction in emissions.

Our data centers, where we run our software solutions for our customers, follow the principle of “Green IT” and consume only 60 % of the energy compared to previous systems.

Our logistics consulting team also advises our customers specifically on how to identify optimization and rationalization potential in their logistics infrastructure and warehouses. This also helps to save energy and reduce emissions.

Our software solutions have many functions which support environmental sustainability. For example, software solutions from us optimize the use of vehicles and other energy-consuming devices such as mobile workstations, which in turn has a positive impact on fuel and power consumption.

In the manufacture of hardware, we and our contract manufacturers refrain from using prohibited chemicals. We also ensure that our suppliers also comply with these prohibitions when manufacturing components and extracting raw materials.

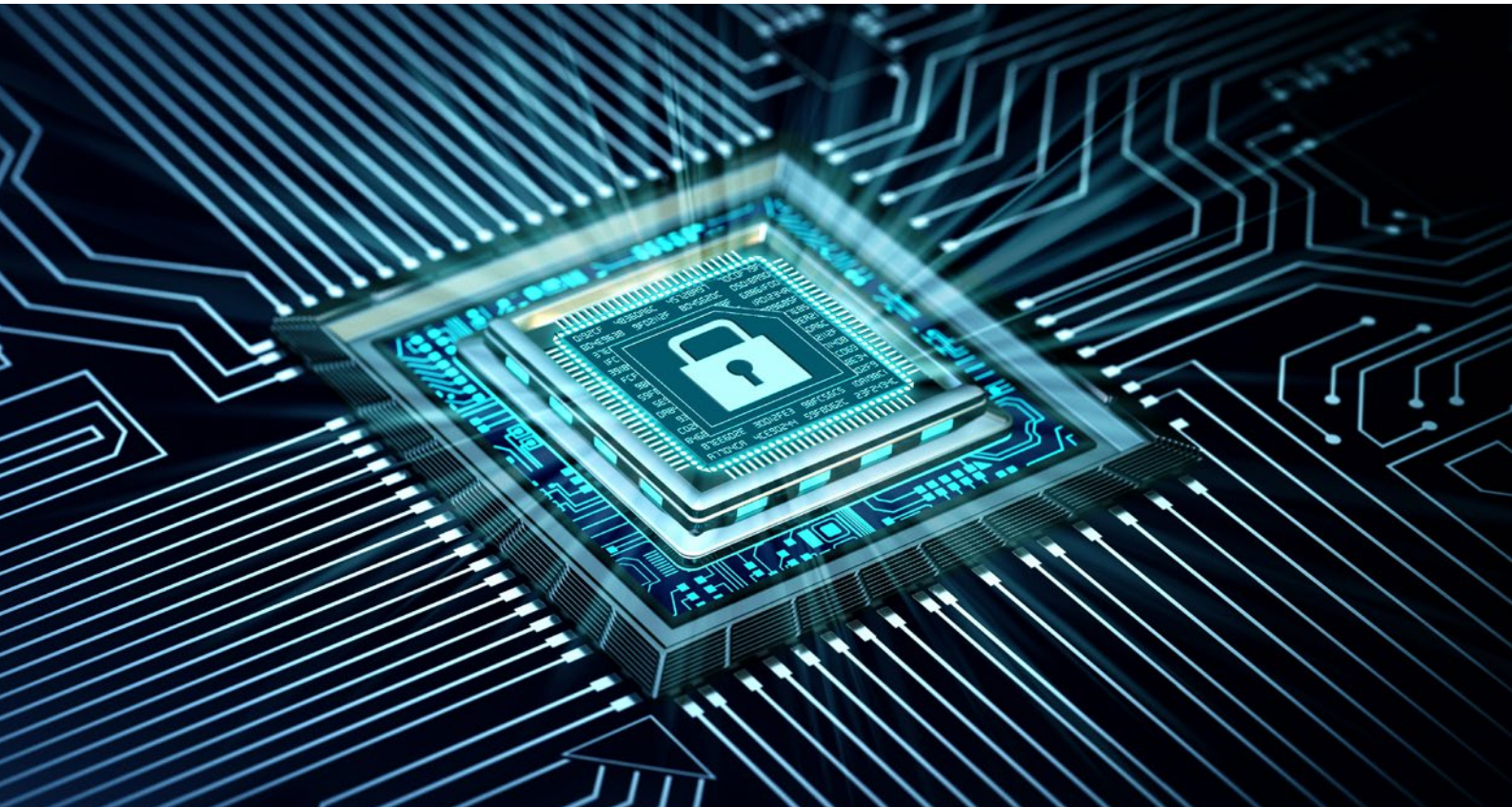


IT SECURITY

More and more of our customers appreciate the advantages of Software-as-a-Service (also called “SaaS”). With SaaS, the software is not installed on the customer’s IT system, but the customer connects via the Internet to the provider’s server (e.g., EPG) on which the software is executed. As a result of constantly advancing technical development, the market trend is clearly moving in the direction of such complete solutions replacing software installations limited to the customer’s site.

We are aware that data processing outsourced to our servers implies a great responsibility for us. That is why we do everything in our power to live up to the trust of our customers, who not only run business-critical processes through our IT infrastructure, but also entrust us with important, often sensitive data so that it can be processed by us.

That is why we as an IT company set a particularly high value on IT security. Our server infrastructure complies with the latest standards and is subject to continuous strict monitoring by internal and external IT experts.



DATA PROTECTION

We do not associate data protection only with IT security and the protection of business interests. At least as important to us is the protection of people's fundamental rights and freedoms, including the information that makes each individual unique. Our high data protection standards are based on the European GDPR as a benchmark. Outside the European Economic Area, we also try to maintain these standards whenever possible, provided that the respective national law permits this. In areas where the respective national data protection law is stricter than the GDPR, of course we implement the national provisions.

Progressive legal and, above all, technical developments prompt us to review our technical and organizational measures (TOM) for data protection regularly and to revise them if necessary.

Our employees are regularly trained and sensitized in the area of data protection.



CORRUPTION AND MONEY LAUNDERING

We as EPG stand up against any form of corruption. Our products stand for themselves and therefore we are convinced that we can compete in a fair market. Bribery and bribability create an imbalance in the market, which sooner or later harms all market participants. Therefore, we do not tolerate corruption in our environment, which is also in our own interest.

We are aware that corruption is not always as obvious as handing over cash to a decision-maker who is deciding on an important application. For this reason, our employees are prohibited from accepting or giving gifts, benefits or invitations that go beyond what is customary in the locality. Specific values are set out in internal guidelines. In case of doubt, the supervisor or the management must be informed.

EPG also rejects any involvement in money laundering or other procedures to conceal the origin of funds.

EPG sees itself as part of society and therefore also makes donations and sponsorships as part of its social commitment. However, this is always done in a publicly comprehensible manner and within the framework of the applicable laws.

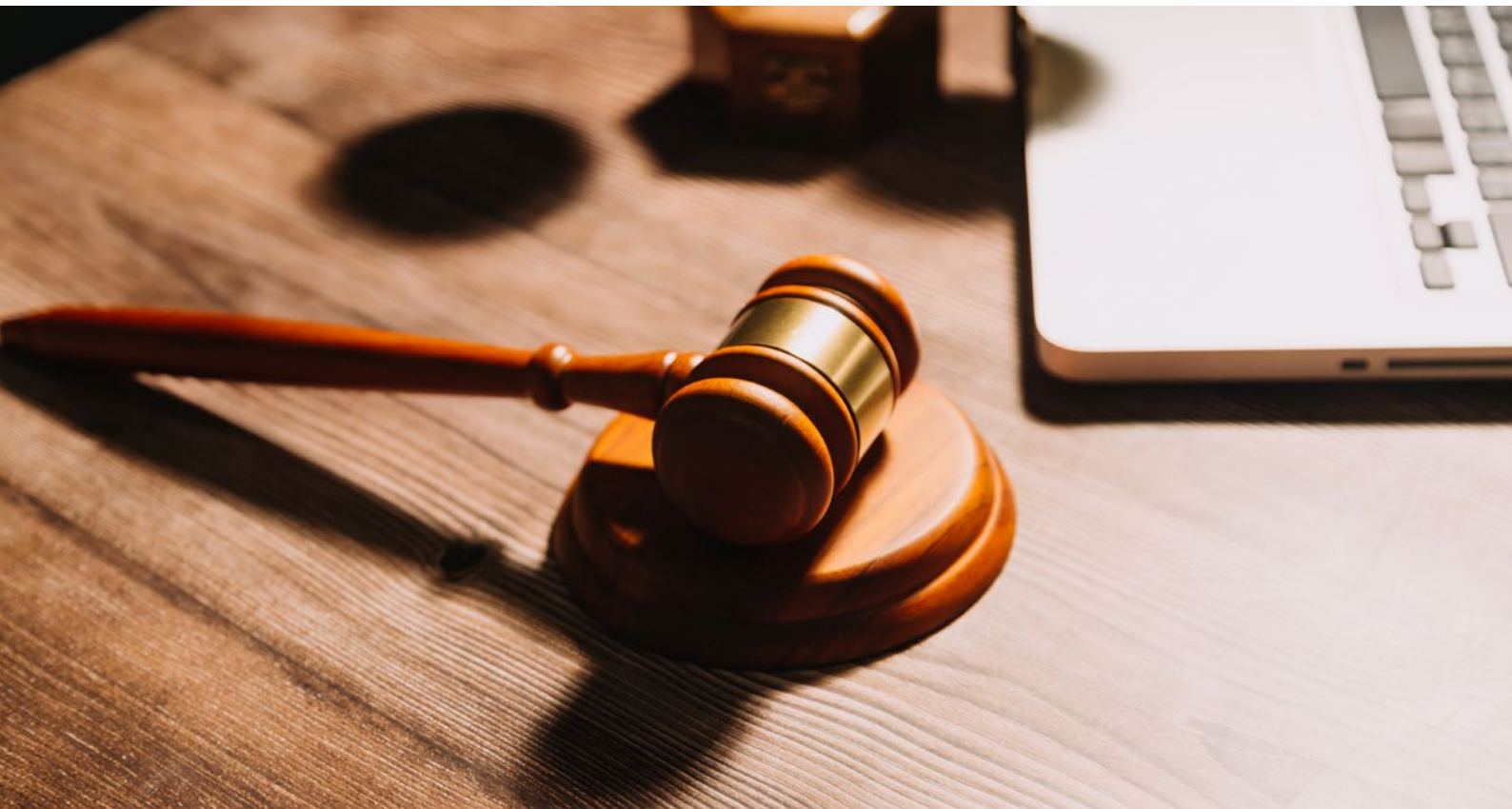


CONSEQUENCES OF MISCONDUCT

If we become aware of cases in which employees, suppliers or service providers have not behaved in accordance with this Code of Conduct, we will take the necessary steps to prevent the continuation or repetition of the misconduct. If necessary, this also includes termination of the contractual relationship with the employee, supplier or service provider. In the event of conduct that is relevant under criminal law, we will also file criminal charges.

We regularly have our internal control system re-audited by external auditors and can therefore demonstrate SOC 2 Type II certification in accordance with the SSAE18 standard for the entire EPG. SSAE 18 is the internationally recognized standard of the American Institute of Certified Public Accountants (AICPA) for the auditing of outsourced processes and thus also fulfils all requirements of the ISAE 3402 standard of the International Federation of Accountants (IFAC), as well as the standard IDW PS 951 of the Institut der Wirtschaftsprüfer in Deutschland e.V. (Institute of Public Auditors in Germany).

To ensure that inappropriate misconduct is detected as soon as possible, we as EPG have also implemented a central confidential whistleblowing system through which misconduct can be reported. Contact can be made via an online reporting portal, by telephone, by e-mail or by mail. It is also possible to submit reports anonymously. Find out more on our website at <https://www.epg.com/gb/whistleblower-system>.



CONTACT

Ehrhardt Partner Group

Alte Römerstraße 3 | 56154 Boppard-Buchholz
Germany

Phone: (+49) 67 42-87 27 0 | Fax: (+49) 67 42-87 27 50

info@epg.com | www.epg.com



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