



Global Anti-Corruption and
Anti-Bribery Policy
of the
Leschaco Group

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1.0 Introduction

The history of corruption is as old as the history of the human race. It runs through all social classes and is not bound to age limits. As a principle, two or more parties merge to disadvantage a third party.

The newspaper "Die Welt" reports in an article that economists estimate that the damage caused in Germany by corruption and bribery amounts to about 250 billion euros per year. In comparison, the federal budget in 2014 was 296.5 billion euros.

These are shocking figures and the damage to the economy must, as a rule, be covered directly or indirectly by all citizens.

The problem of corruption is so global that the UN has adopted a directive:

UNITED NATIONS CONVENTION AGAINST CORRUPTION.

The substantive content of this convention forms the basis of the worldwide Leschaco Anti-Corruption and Bribery Directive.

The great corruption and bribery scandals of the last 10 years, in Germany, have not only caused great economic damage, but also contributed to the great insecurity of the population. It is essential for a globally operating company group to fight against corruption and bribery, in order to ensure, that there are no cases of corruption or bribery in their own company.

As a company committed to ethical and moral principles, management commits itself and all employees to comply with the international anti-corruption and bribery rules.

The implementation of the Sarbanes-Oxley Act, the stricter application of the Foreign Corrupt Practices Act in the US and the stricter Bribery Act in the UK are signs of increasingly strict regulations against corruption and bribery.

2.0 Definition of Corruption

Corruption is the abuse of entrusted power or resources for personal benefit or for the benefit of the company.

Corruption has many forms. For example, we know bribery, embezzlement, extortion, nepotism or fraud, and it is unacceptable in our group of companies in any form and is not tolerated.

3.0 Definition of bribery

For us, bribery is the offer, granting or acceptance of benefits (money or gifts). The aim of these measures is to exercise an unauthorized influence on the decisions or behavior of the receiver.

Bribery can also have many forms. As a principle "one hand washes the other". This means a service for a counter-service, with the aim of unauthorized influence. The following acts are considered bribery:

- Direct or indirect promise, offer or acceptance of benefits of any kind with the aim of influencing an action.
- Offer or accept bribes, loans, fees, rewards or other unlawful benefits.
- Help, donations or voting with the aim of achieving an inadmissible influence or dependency.

Even though it is common practice in some countries to make smaller payments to civil servants in order to achieve some degree of relief, e. g. in handling imports, they are a violation of this company policy.

4.0 Guidelines

It is the policy of the whole Leschaco organization to comply with all applicable anti-corruption laws. This includes, where applicable, the US Foreign Corrupt Practices Act and the UK Bribery Act. All applicable local laws in countries where Leschaco operates or conducts business are also observed. It is Leschaco's policy to ask all agents and business partners to follow these rules and to support us in our work.

We expect our employees and business partners to be fully loyal to our company and that no personal interests play a role in any business decisions that have to be made. Conflicts of interest can occur whenever social, personal, financial or political interests of the employee conflict with the interests of the company.

This has often not had a positive impact on ethical and moral principles. This is one of the reasons why our group of companies places such high demands on the ethical and moral conduct of our employees in order to avoid conflicts of interest. The following section deals with this topic in detail.

5.0 Management of conflicts of interest

Our customers and partners must always be sure that services provided by us or our subcontractors are always provided with the greatest confidence and with the necessary expertise, in compliance with all legal regulations and according to the legitimate interests of our customers. Leschaco requires its employees and subcontractors to follow high ethical standards and to act professionally.

Compliance with these requirements is controlled by the Compliance department. This department reports directly to management and is not subject to any directives. The Compliance department has the responsibility to identify conflicts of interest and, together with the Management Board, to establish measures, identify and resolve conflicts.

6.0 Types of Conflicts of Interest

The globalization of the international economy and the complexity of the supply chain have caused many different interests to clash. Therefore Conflicts of interest cannot be completely prevented. These different interests can lead to conflicts with customers, subcontractors, employees, the company's management or third parties.

The employees of the group of companies are obliged to avoid everything that leads to conflicts of interest between their interests and the legitimate interests of the company or the interests of our customers. Therefore it must not be the appearance that conflicts of interest may happen.

7.0 Conflicts of interest that may arise

Potential situations that could lead to conflicts of interest if the rules are not observed

- No employee may follow his personal interests in transactions he performs for the group of companies. These interests may relate to financial, material or other benefits.
- No employee may accept any provision, fee or other benefit from actual or potential suppliers. The same applies to the fees of clients in connection with our business activities.
- No employee may use confidential information to gain personal advantages. This applies to both financial and material benefits.
- No employee will be allowed to provide members of his family with financial, material or other benefits related to his activities in our company.
- No employee is permitted to give commercial benefits to any person or company to whom he has good business or private relationships. This applies in particular to the transmission of confidential information.
- No employee may be employed by suppliers, customers or competitors during his employment in our group of companies or have any other personal business relationships with them.

The examples listed in this section only represent a small part of the possible conflicts of interest. They could be continued at will.

It is very important that conflicts of interest are to be avoided. Employees must ensure that personal interests or relationships do not affect business activity.

Personal interests may under no circumstances conflict with the interests of our group of companies. It is important that this impression does not appear even in the external relationship and that the good reputation of our company is therefore damaged.

Please make sure that your private background does not give any reason to doubt your fairness, integrity or objectivity.

If conflicts of interest should arise during your employment in our company, you must inform your supervisor. He will try to find a solution together with you. If the relationship of trust with your supervisor is permanently clouded, please contact the compliance officer.

8.0 Invitations and gifts

In many parts of our company there are contacts with customers, suppliers and service providers. It therefore is essential that our relationships with our business partners are based on a clear commitment, that our decisions are based on fair trade and free from conflicts of interest.

We understand these terms as a basic principle all benefits which have a material or immaterial, objectively better status for the recipient and to which there is no legal claim.

There is a general risk that invitations and gifts may affect our ability to make business decisions effectively and objectively. It can therefore lead to our decisions not being taken without conflicts of interest.

8.1 Definition: Invitations

We understand invitations as e. g. Business lunches, musical or opera visits, sporting events, hotel accommodation. These may be monetary or tangible assets, non-cash benefits (e. g. vouchers, free tickets or admission tickets), unusual discounts, invitations to events with payment of travel expenses, etc. These can all be paid for in cash or in kind.

8.2 Definition: Gifts

Under gifts we understand for example:

The payment of money in cash, by bank transfer or cheque, unusually high discounts or access to particularly cheap services and products. Also loans, the free

or particularly favourable use of holiday facilities, gift vouchers, expensive watches or ballpoint pens are in this category.

9.0 Which invitations and gifts may be accepted

Invitations and gifts may only be accepted if they are to be understood as a gesture of courtesy or a general business practice.

Invitations and gifts may never be accepted if it can be seen that the supplier is expecting something in return, in the form of orders, information etc..

Employees may accept invitations or gifts if the value in each individual case does not exceed US \$ 50,-- (or the value in another currency).

Normally, promotional gifts that represent only a small value, such as ballpoint pens with promotional print, baseball caps, calendars, bouquets, books, etc., can be accepted.

Invitations to restaurants, sports events, theatres, etc. should only be accepted if the inviting person himself takes part in the event.

In principle, all invitations must be reported to the Department Manager

If you receive invitations or gifts that exceed the value of US \$ 50,- - (or the value in another currency), they are subject to authorization.

Check with the department head whether it makes sense for our group of companies to accept the offered invitations or gifts or not. In case of doubt, the management and the compliance department have to be involved in the decision.

Gifts presented on special occasions such as anniversaries, farewell etc. may be accepted if they are within the normal, customary framework. They should not exceed US \$ 100,-- (or the value in another currency) in individual cases.

In special cases, it may happen that local traditions do not allow the rejection of a high-quality gift without offending business partners. In individual cases, this could lead to a lasting negative impact on business relations. If such an event occurs, the gift may be accepted. Such gifts must be reported to the management of our Group without delay. The management then decides on the further use.

10.0 Special regulations for government officials, civil servants and employees of international organizations

This group of people includes among others

- Employees and executives of public authorities or other government agencies
- Employees of public authorities -
- Employees of customs and financial authorities
- politicians

- Employees of international organizations
- Police and Public Prosecutor's Office employees
- etc.

Employees of the Leschaco Group are prohibited from offering gifts, donations or other benefits of any kind to the above-mentioned group of persons. This also applies to gifts, etc. which are handed over indirectly through third parties.

11.0 Legal basis

Employees working in the purchase or sales department are subject to various temptations. The shift from small gifts to alarming benefits is smooth and can very quickly lead to suspicion of corruption.

The current jurisdiction tolerates smaller gifts, giveaways and food invitations in a normal range. They are not understood as a preference. Benefits that exceed the normal level of value can be considered as bribery, depending on the circumstances.

The facts of bribery are regulated in country-specific laws.

All forms of corruption and active bribery are strictly prohibited for all employees of our group of companies. Violations of the directive are not tolerated and will be sanctioned accordingly.

12.0 Confidential reporting of circumstances that give reasons to suspect violations against our policies

We expect from our employees that they report incidents that indicate a violation of this policy. The report can be submitted to the department manager, the compliance Manager or the management. After the publication of Edward Snowden's revelations, the term "whistleblower" (Informant) has become established in the world.

Employees who are afraid to pass on such information directly can contact us anonym at the following e-mail address:

whistle.blower@leschaco.com

As in any company, it is also true for us that something can go wrong from time to time, and anything that is immoral or illegal may go wrong. The aim of our measures is to encourage our employees to contact us as soon as possible, if they feel that there is an indication of suspected improper conduct. Every employee can rely on the fact that his concerns are taken seriously and that confidentiality is also maintained at all times. This also applies to cases where a suspected cause for suspicion proves to be unfounded.

13.0 Implementation of this Directive

All employees must familiarize themselves with this policy. The managers of the branch offices are responsible for ensuring that all employees are informed about this policy. They have to confirm in writing that the content has been recognised and understood.

14.0 Violations of this policy

Violations of the Directive will not be tolerated. Management reserves the right to take appropriate measures which, in special cases, may lead to warning notices or termination of the employment relationship.

15.0 Validity and competence

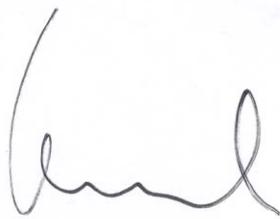
Our policy applies worldwide to all employees of the Anker / Leschaco Group. This includes directors as well as executives, managers, trainees, temporary workers, consultants, etc.

We expect all partners in the transport chain to adhere to these specifications.

If you are not sure whether something falls within the scope of this policy, please contact your compliance manager. You can contact him at the following e-mail address:

heinz.stelljes@leschaco.com

Bremen, March 1, 2018



Oliver Oestreich
Member of the Managing Board of the Leschaco Group