

# Supplier Code of Conduct

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## Introduction

At Panalpina we are committed to pursuing our business responsibly, with integrity and in full compliance with the law. We respect different cultures and the dignity and rights of individuals in all countries; we support the principles outlined in the UN Universal Declaration of Human Rights and adhere to fundamental labor and environmental standards.

Panalpina expects its suppliers of goods and services (“suppliers”) to conduct business following the same principles. Panalpina has set forth these principles in the Supplier Code of Conduct (“the code”). By accepting the code, suppliers commit to fulfill its principles and standards in all existing and future business relationships with Panalpina.

## Application

The code applies to all of Panalpina’s suppliers. This includes the directors, employees, affiliates, agents and subcontractors of the suppliers that are involved in the supply of goods or services to Panalpina. The suppliers have to ensure that the requirements set out in the code are followed and complied with.

## Compliance with laws

Panalpina’s suppliers must comply with all applicable laws and regulations, including those relating to:

### Human rights and good employment practices

- Respect the human rights and dignity of all people
- Comply with applicable laws, regulations and industry standards on working hours and minimum wages
- Do not allow forced or compulsory labor, child labor, human trafficking, slavery or servitude and ensure that all work is conducted voluntarily, without threat of penalty or sanction and is not based on deception

- Do not engage in or support discrimination on the basis of race, color, sex, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, family responsibilities, age, disability or other characteristics

**Environment, health and safety**

Panalpina's suppliers must commit to provide safe products and services to Panalpina and ensure a safe working environment to prevent accidents and minimize exposure to health risks. Suppliers must comply with applicable environmental laws and regulations in their operations, assess risks, and develop and implement plans and programs to mitigate those risks and correct any non-compliant practices. Suppliers will preserve resources and protect the environment.

**Corruption and bribery**

Panalpina's suppliers must comply with all applicable anti-corruption laws and ensure that they do not pay money, promise to pay money, authorize to pay money or offer or promise anything of value to any person to influence their judgment or conduct. Suppliers must not engage in fraudulent activities or extortion.

**Gifts, entertainment, hospitality**

Panalpina's suppliers must not request, accept, solicit, offer or provide any benefits to Panalpina employees or to any person in order to unduly influence their judgment or conduct.

**Money laundering**

Panalpina's suppliers must comply with all applicable laws relating to money laundering.

**Conflict of interest**

Panalpina's suppliers must ensure there are no personal relationships which might unduly influence their business with Panalpina.

**Fair competition**

Panalpina's suppliers must adhere to the applicable anti-trust laws.

**Trade regulations**

Panalpina's suppliers must comply with the applicable import and export control laws, including sanctions, embargoes, anti-boycott and other laws, regulations, government orders and policies controlling the transfer or shipment of goods and technology.

**Accounting matters**

Panalpina's suppliers must keep accurate books, accounts and records related to their business with Panalpina and not conduct any off-the-book transactions or maintain off-the-book assets.

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**Confidentiality**

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Panalpina's suppliers must comply with all applicable laws concerning data protection and will have adequate procedures in place to safeguard and protect confidential information related to Panalpina and its customers. Any confidential information shared with them must be used only for its intended purpose.

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**Communication along the supply chain and reporting possible violations**

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Panalpina's suppliers will communicate the requirements of the code to all members of their organization and their suppliers and service providers, and will take reasonable care to ensure these requirements are followed by them. In case of any actual or suspected violations of the code by employees or third parties, or of any illegal or criminal activity related to their business with Panalpina, the suppliers must promptly inform Panalpina's Corporate Ethics and Compliance Department at [www.panalpina.com/compliancehotline](http://www.panalpina.com/compliancehotline).

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**Monitoring activities and corrective measures**

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Panalpina may conduct reasonable audits with prior notice to verify the suppliers' compliance with the code. Panalpina's suppliers must support and cooperate with the assessment processes and will authorize Panalpina and its designated agents (including any third parties) to perform such monitoring activities, which shall be performed without unreasonably disrupting the suppliers' work. Panalpina can request that corrective measures be taken if any actions or conditions deviate from the code. In case of a grave violation or a continuous failure to comply, Panalpina may terminate the business relationship.



# Certification

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The undersigned, a duly authorized representative of

\_\_\_\_\_ (“Supplier”),

hereby certifies that:

- *She / He has received, read and understood Panalpina’s Supplier Code of Conduct*
- *She / He accepts Panalpina’s Supplier Code of Conduct and commits to fulfill its principles and standards in all existing and future business relationships*
- *Agrees to report any suspected or actual violations or other deviation of Panalpina’s Supplier Code of Conduct to Panalpina’s Corporate Ethics and Compliance Department.*

Name	Position	Signature
1.		
2.		
Date and place		