

# Code of Conduct **SCHACHINGER Group**



# Message from our Directors



DI Günther Gfrerrer

Dr Ehrenfried Werderits

## Dear colleagues, valued business partners

In an increasingly complex and dynamic business world, it is crucial that we not only comply with legal requirements but also act ethically and responsibly. Our decisions – whether in day-to-day operations or in strategic matters – impact employees, business partners, customers, the environment, and society. It is therefore all the more important that we can rely on clear guidelines that provide direction and safeguard our actions.

This Code of Conduct is more than a set of rules; it is intended to encourage participation. It is a promise – to ourselves, our colleagues, and everyone associated with SCHACHINGER. It describes how we treat one another, how we assume our responsibility towards the environment and society, and how we conduct business with integrity and fairness. Every single contribution counts. Regardless of function or location, we all contribute to ensuring that our values are put into practice and our standards are maintained.

As business leaders, we see it as our duty not only to represent these values, but to actively put them into practice. We invite you to view this Code not as required reading, but as an opportunity to help shape it. Because every decision, every action, and every conversation contributes to strengthening our corporate culture.

Let us work together to ensure that SCHACHINGER remains a place where responsibility, trust and humanity are at the heart.

Dr Ehrenfried Werderits and DI Günther Gfrerrer  
Managing Directors SCHACHINGER Logistik Holding GmbH



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# 1. Introduction and Scope

The public image of the SCHACHINGER Group (hereinafter referred to as SCHACHINGER) is largely determined by the appearance and behaviour of all employees and business partners.

This Code of Conduct reflects the values that are put into practice and expected of all of us, and are also anchored in the Mission Statement Pyramid. It ensures a safe, respectful, and ethical work environment at SCHACHINGER. Its scope includes all companies in which the SCHACHINGER Group holds a majority stake. This applies to all levels of our organization, including executives, management, and employees – regardless of the SCHACHINGER Group company or location – and is anchored as an addendum to the employment contract. The values covered in the SCHACHINGER Mission Statement Pyramid are highlighted in the following chapters.

For the SCHACHINGER Group, commitment to its suppliers' Code of Conduct is also a prerequisite for any business relationship. Any changes to the Code of Conduct will be communicated accordingly, and the SCHACHINGER Group expects its suppliers (and subcontractors) to accept such changes.

# 2. Core Values and Principles

## 2.1. Lawful Conduct

Compliance with applicable law is our top priority, regardless of whether it is national or international law. We therefore respect the legal regulations applicable to our activities.

Misconduct and violations of applicable law and the behavioural requirements of this Code can have serious consequences not only for us personally, but also for the entire company. For this reason, deliberate, unlawful misconduct and violations will be punished consistently and without regard to the rank and position of the individuals involved. The person responsible may, if necessary, be held liable for any damages suffered.

Our suppliers are also obligated to comply with applicable laws and the ethical and conduct standards of this Code. This includes, in particular, the principles of the United Nations Global Compact, the ETI Base Code, and the ILO Declaration on Fundamental Principles and Rights at Work – always in accordance with applicable national laws and practices. Violations may lead to termination of the business relationship.



## 2.2. Mutual Respect, Honesty and Integrity

We always ensure that we respect the personal rights of others and treat everyone politely, fairly, and with respect. Diversity of nationalities, cultures, religions, skin colours, genders, sexual orientations, and worldviews is firmly anchored in SCHACHINGER's identity and is promoted through appropriate training for managers, our leadership philosophy, and our Family Charter. Any form of mistreatment, discrimination, disregard for human rights, bullying, or other unequal treatment will not be tolerated and will be strictly punished.

Only through honest communication can a credible and respectful corporate culture be maintained. Therefore, we place great value on open and honest communication. We ensure that information is communicated clearly, completely, and respectfully. Half-truths, untruths, or the deliberate withholding of relevant information contradict SCHACHINGER's core principles.

These principles apply to both internal and external collaboration with customers, suppliers and all business partners.

## 2.3. Acting Responsibly

Acting responsibly is another central component of our corporate culture. We take responsibility for our actions and the impact they may have on other people, our environment, and SCHACHINGER. This means acting consciously, proactively, and conscientiously, as well as accepting mistakes and learning from them – regardless of position or function.

# 3. Integrity in Business Conduct

## 3.1. Relationships with Business Partners

We strive for long-term, trusting relationships with our business partners based on mutual respect and integrity. All business relationships are founded on professionalism and a clear commitment to transparency and fairness. Furthermore, agreements are conscientiously implemented, and the interests of all parties involved are respected.

We expect the same level of professionalism and transparency from our partners and only work with companies whose ethical principles align with ours. This is largely implemented through an internal Sustainable Procurement Policy, a commitment to adhere to the SCHACHINGER values through the signature of this Code of Conduct, and a self-declaration of sustainability practices by suppliers through ESG Performer.

Our goal is to ensure the long-term success and trust of our stakeholders through fair and respectful business relationships. Should a collaboration nevertheless reveal inappropriate or illegal behaviour, those business relationships will be re-evaluated and appropriate legal or business measures taken. In such cases, SCHACHINGER employees should contact their managers or the Legal Department directly. If this is not possible for various reasons, the Austrian Whistleblower Protection Act (HSchG) provides the option of reporting any cases anonymously using the whistleblower tools.



## 3.2. Compliance with Competition and Antitrust Law

At SCHACHINGER, we believe that only fair competition enjoys the right to develop freely – our principle of integrity also applies in the fight for market share. Accordingly, we are committed to complying with all rules of fair competition. Any agreements with competitors, such as coordinated prices or capacities, non-compete clauses, the submission of fictitious bids in tenders, or other informal arrangements (“gentlemen’s agreements”), will not be tolerated. Any contracts or agreements in question must be reported to the Legal Department without exception.

Furthermore, discrimination against suppliers in the awarding of contracts without objective reason is prohibited. Our collaboration with our suppliers is characterized by fair contractual terms and appropriate compensation – as well as the expectation that our suppliers also behave fairly and correctly towards their own employees and subcontractors, and that all legal requirements are complied with.

## 3.3. Prevention of Corruption



SCHACHINGER maintains a strict zero-tolerance policy toward corruption, including bribery, which is enshrined in its Anti-Corruption Policy. No one may use their official position to offer, grant, demand, or accept unjustified advantages, such as cash or non-cash benefits, to any other person – whether directly or indirectly, knowingly or unknowingly – that could impair, or even create the appearance of impairing a person's performance, objectivity, or fair business decisions. From our suppliers we also expect a zero-tolerance policy toward corruption and bribery, as well as compliance with all applicable anti-corruption and money laundering laws.

The same applies to the acceptance of improper benefits. The only exception is the offering or acceptance of locally or nationally customary gifts of low value (usually less than €100). In case of doubt, employees should contact their line managers or the Legal Department.

## 3.4. Product Safety, Quality and Responsible Supply Chains

As a logistics company, SCHACHINGER stands for safe, reliable, and high-quality services. We ensure that the transport, storage, and handling of goods are carried out according to the highest quality standards – safely, on time, and in compliance with all legal regulations.

For us, product safety means identifying risks in the supply chain at an early stage and designing processes so that goods are handled responsibly and delivered safely.

Our suppliers are required to comply with applicable guidelines and standards regarding product safety and quality. Legally compliant processes, careful handling of goods, and transparent quality controls are essential.

Furthermore, we expect responsible raw material sourcing that respects human rights, environmental standards, and legal requirements. Critical materials must be subject to special scrutiny, risks minimized, and sourced preferentially from certified sources. Furthermore, appropriate due diligence processes must be established to ensure that the principles of non-discrimination are followed in supplier selection, and that our subcontractors also adhere to the standards of this Code of Conduct.

We also require compliance with all national and international animal welfare regulations along the supply chain and the renunciation of animal testing – unless required by law.

### 3.5. Donations

Donation requests are submitted to SCHACHINGER by various organizations, institutions, and associations. SCHACHINGER grants monetary and in-kind donations exclusively for the common good, such as education, science and research, art and culture, sports, assistance in disasters and emergencies, or other social purposes.

We always ensure that donations are made transparently and traceably and are not transferred to private or unknown foreign accounts. We select donation recipients based on their goals and objectives that align with SCHACHINGER's core principles and corporate philosophy. Furthermore, donations must not violate legal regulations. This is also enshrined in our anti-corruption policy.



## 4. Social Responsibility

### 4.1. Environmental and Climate Protection

We all bear responsibility for protecting our environment and the climate. Protecting the environment and conserving its resources are central components of SCHACHINGER's corporate strategy. This includes promoting biodiversity at our locations (e.g., bee sponsorship), reducing energy consumption and using resources efficiently, minimizing waste, and striving to reduce our emissions by 80% by 2040 through appropriate measures such as the purchase of electric trucks.

We make our business decisions with due consideration of their environmental impact to make a positive contribution to global climate protection. Furthermore, we continuously seek innovative ways to further reduce our ecological footprint and optimize our processes.

All employees are encouraged to support the company's goals and actively contribute to environmental protection. Our goal is to source primarily in a sustainable way. Our suppliers are expected to comply with legal norms and international environmental standards, minimize environmental impacts, and continuously improve environmental protection.



## 4.2. Occupational Health and Safety

Responsibility towards our employees requires the best possible protection of their health and prevention of accidents. This includes regular safety inspections, strict compliance with occupational health and safety regulations, and ongoing training regarding workplace accidents and health risks. These measures are systematically implemented in accordance with our ISO 45001 certification.

In addition, we promote a healthy working environment, actively support initiatives to promote physical and mental health, and ensure a healthy work-life balance.

The specific guidelines and measures are defined in our Labour and Human Rights Policy.

Our suppliers are also required to fulfil their responsibility for the health and safety of their employees. This includes compliance with all legal requirements, active risk minimization, and the implementation of appropriate preventive measures against accidents and occupational diseases.

We also expect the establishment and implementation of an appropriate occupational safety management system and the conduct of regular training to ensure that all employees are competent in occupational safety.



## 4.3 Human Rights and Fair Working Conditions

For SCHACHINGER, respect for human rights and ensuring fair working conditions are top priorities, which are enshrined in our dedicated Labour and Human Rights Policy. We are committed to ensuring that all employees are treated fairly and are never subjected to corporal punishment or any other form of physical, sexual, psychological, or verbal abuse.

Any form of modern slavery, child labour, exploitation, and human trafficking is not tolerated at SCHACHINGER or in our supply chain. We ensure strict compliance with relevant laws and international human rights standards.

Unless a higher age limit is prescribed by law, no persons will be employed who are still of compulsory school age or younger than 15. Employees under 18 years of age may not be assigned to dangerous work and may be exempted from night work, taking their training needs into account.

Fundamental rights must also be upheld in the companies in our value chain, and fair working conditions must be ensured. This includes equal opportunities and equal treatment – as well as the protection of the dignity, privacy, and personal rights of all employees.

Forced labour, abusive practices, or discriminatory behaviour will not be tolerated. Employees must not be forced to work, must retain control of their identification documents at all times, and may not pay any fees for their employment. Fair remuneration and compliance with legal requirements regarding working hours, overtime, and social benefits must be ensured. Freedom of association under Austrian and European law must be respected without discrimination or preferential treatment, and the HSchG must be implemented.



## 5. Conflicts of Interest and Corporate Resources

### 5.1. Avoidance and Disclosure of Conflicts of Interest

SCHACHINGER is committed to avoiding conflicts of interest and loyalty. Such conflicts can arise when employees hold shares in or are employed by companies that have business relationships with SCHACHINGER, or when employees or their family members have financial or personal interests in the activities of SCHACHINGER's customers, suppliers, service providers, or competitors.

For this reason, all employees are required to immediately inform their managers of any personal or financial interest that may arise in connection with the performance of their official duties.

### 5.2. Protection of Corporate Resources

We take care to use company resources—such as materials, equipment, IT systems, data, and intellectual property—carefully and responsibly. Company property is intended exclusively for business purposes; personal use is prohibited. We are all responsible for protecting company property from loss, theft, misuse, or damage. Any misuse or waste of company resources may result in disciplinary action.

### 5.3. Secondary Employment and Holding Political Office

SCHACHINGER generally takes a neutral stance toward active political participation and the assumption of political office. As a general rule, any secondary employment – which includes political office – must be reported in advance in writing to the Human Resources Department. Secondary employment may be prohibited at the company's discretion – with or without consultation with the Legal Department – if, for example, it could impair work performance, contradict the principles of SCHACHINGER enshrined in this Code of Conduct, pose a risk of a conflict of interest, or could harm SCHACHINGER's public reputation.



## 6. Information and Communication

### 6.1. Transparent Business Conduct

We attach great importance to transparency in business transactions, especially financial integrity, as the foundation for responsible corporate governance. This includes the transparent, complete, and accurate recording of all financial transactions and business processes. We strive to ensure transparency and reliability – equally in our relationships with owners, employees, customers, business partners, the public, and authorities. Manipulation, omissions, or deliberate misrepresentations constitute a violation of our fundamental principles and will be prosecuted with legal consequences. We therefore undertake to consistently comply with all legal requirements and the principles of proper accounting.



### 6.2. Data Protection and Data Security

The advantages of electronic communication and electronic data processing come with risks to privacy and data security. Ensuring high standards of data quality and technical protection against unauthorized access is a top priority for SCHACHINGER.

We are therefore committed to complying with statutory data protection regulations and contributing to the protection of data from unauthorized access – also enshrined in our specially developed Data Protection Policy. This also applies to our suppliers.

Personal data may only be collected, processed, or used to the extent necessary for specified, explicit, and legitimate purposes. The use of the data must be transparent for those affected, and their rights to information and rectification, as well as to objection, blocking, or deletion, must be respected. In cases of doubt, employees are encouraged to contact SCHACHINGER's Data Protection Officer.

### 6.3. Intellectual Property and Artificial Intelligence

Protecting intellectual property is an expression of respect for the creative and innovative achievements of others. We are committed to respecting copyrights, trademarks, patents, trade secrets, and all other forms of intellectual property – both our own and that of others. The unauthorized use, distribution, or reproduction of protected content is prohibited.

As the use of artificial intelligence increases, the responsible use of AI systems is also becoming increasingly important. We only use AI where it is transparent, legally permissible, and ethically justifiable. We pay particular attention to ensuring that the use of AI does not violate copyrights, disclose confidential information, or lead to discriminatory decisions.

## 6.4 Confidentiality and Insider trading

All internal SCHACHINGER matters that are not published must be treated confidentially. All company data made available to us in the course of our work must therefore be treated with the utmost care and protected from unauthorized access. Such information must be used only for the purposes for which it is intended. Without express permission, it may not be shared or published, nor may files, images, or audio files be copied. This includes, for example, information about the company's organization and facilities, internal reporting figures, and information about customers, suppliers, consultants, or other business partners. Employees who work with particularly confidential information, such as personnel or financial data, are particularly obligated to maintain strict confidentiality – even internally.

Insider trading represents a clear violation of our core principles and legal regulations. It is expressly forbidden to use non-public, potentially value-influencing information about SCHACHINGER or its business activities for personal gain – even if doing so would not result in financial loss. This includes using confidential company data that could influence the price of shares or other financial instruments for trading purposes.

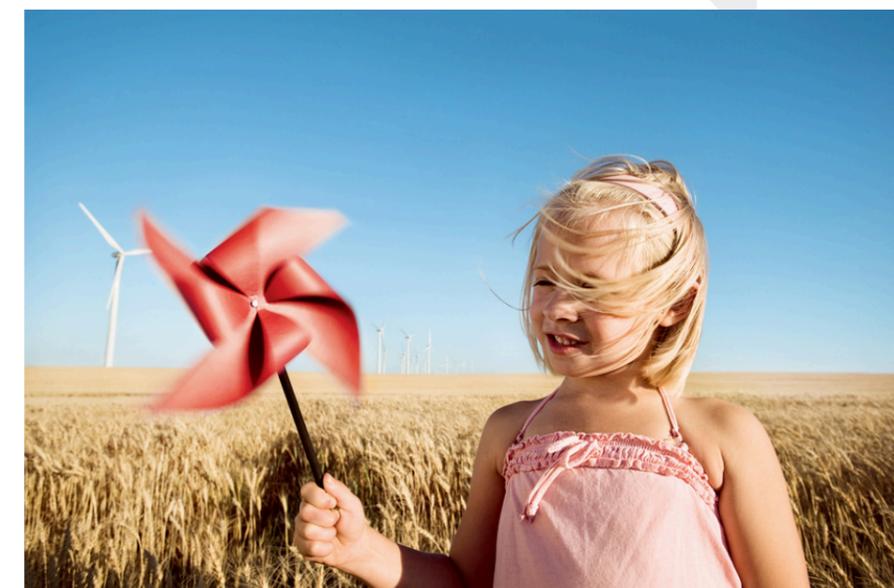
The obligation of confidentiality continues even after the employment relationship has ended.



## 6.5. Accurate Information about Products/Services

As part of our core principles, it is essential to always describe our products and services transparently, objectively, and honestly. All statements—whether in marketing materials, sales literature, or in direct customer contact—must be based on verifiable facts and must not be misleading. Exaggerations, unclear wording, or deliberately embellished representations that could create false expectations are deliberately avoided. Our goal is to provide reliable information that our customers, business partners, and the public can rely on without reservation.

This applies in particular to statements related to environmental issues, sustainability, and social responsibility. We avoid unsubstantiated or exaggerated claims about the ecological or ethical benefits of our products/services (greenwashing). Instead, we strive for clear, verifiable, and understandable communication to strengthen trust in our brand and our corporate actions in the long term.



## 7. Code of Conduct Violations

We all share a responsibility to ensure that our principles and rules are adhered to. All employees can report any circumstances that indicate a violation of this Code of Conduct to their line managers, the Human Resources department, or employee representatives at any time. In addition, every location has a whistleblower mailbox where anonymous reports can be submitted.

All reports will be treated seriously and confidentially. Violations of the Code of Conduct may result in disciplinary and legal action, up to and including termination.

We can all contribute to identifying risks early, averting damage, and making our working environment fair and ethical.

## 8. Code of Conduct Implementation

Management and executives bear a special responsibility for adhering to and promoting the values enshrined in the Code. Their role model function is crucial for ensuring that ethical standards are implemented and practiced throughout the company. Regular employee training, the promotion of an open corporate culture, and compliance monitoring serve to actively implement these standards.

Each and every individual contributes to living the values enshrined in the Code of Conduct in their daily work and making them visible through their own behaviour – both within the company and externally. Only through active participation at all levels can a corporate culture characterized by integrity, respect, and responsibility be created.

## 9. Acknowledgement

By signing this Code of Conduct, the managing directors confirm that they have read, understood and agreed to comply with it.

To ensure compliance with the Code of Conduct by our suppliers, we have it confirmed by a separate declaration of acknowledgement, which is signed by our suppliers and serves as an additional agreement to existing contracts.

Future changes to the Code of Conduct will be communicated accordingly.



Dr Ehrenfried Werderits

Managing Director Schachinger Logistik Holding GmbH



DI Günther Gfrerrer

Managing Director Schachinger Logistik Holding GmbH



The scope of application applies to SCHACHINGER Logistik Holding GmbH and the following subsidiaries:

- Schachinger Branchenlogistik GmbH
- Schachinger Paketdienst Gesellschaft m.b.H.
- Schachinger Immobilien und Dienstleistungs GmbH & Co OG
- Schachinger GmbH
- SCHACHINGER pharmalogistik GmbH
- SCHACHINGER marken & frische logistik GmbH
- SCHACHINGER baulogistik GmbH
- SCHACHINGER automotive GmbH
- SHP Speditions Ges.m.b.H.
- Schachinger cargomax s.r.o. Budweis
- SCHACHINGER logistik service GmbH
- SCHACHINGER primetime GmbH
- KSK-Transport u. Logistik GmbH
- 1-0-1 Impact GmbH



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