



Code of business

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Introduction

The reputation of a company is one of its biggest assets as it builds trust with employees, customers, business partners and the public. Independently of where GLS does business, it is of utmost importance that we abide by all applicable laws and regulations and that we strictly adhere to our own ethical standards.

Therefore please take the time to carefully read this Code of Business Standards

Every GLS Group employee is responsible for observing the principles of this code. Your actions affect not only our reputation and image; non-compliance can also result in other serious damages and loss of trust with our stakeholders.

If you have any questions please contact your Line Manager or responsible Compliance Manager.

Martin Seidenberg

CEO
GLS Group

Thorsten Pruin

CFO
GLS Group

Purpose and Scope

This Code of Business Standards details the commitments of GLS Group¹ ('GLS') to its four main stakeholders:

- **employees,**
- **customers,**
- **business partners, and**
- **the general public**

It forms the basis for all business activities of GLS Group. It should be read in conjunction with the respective GLS Group policies and guidelines.

The rules set out in this document apply to all employees of GLS Group worldwide. Managers have a particular responsibility to ensure that these rules are communicated to and respected by their teams.

Third parties do not derive any rights from this Code of Business Standards.

Laws, Regulations and Internal Policies

All GLS activities and the business conduct of all GLS employees must be in line with applicable laws and regulations as well as relevant internal policies, guidelines and standards.

Any violation of these rules may result in disciplinary action up to and including dismissal of any employees involved.

GLS Ethical Standards

Independently of any specific legislation, GLS Group adheres to certain ethical standards:

- GLS supports and respects international human rights.
- GLS upholds freedom of association and recognizes the right to collective bargaining.
- GLS follows a zero tolerance policy concerning forced and compulsory labour as well as child labour.
- GLS respects diversity such as race, gender, religion, age and sexual orientation.
- GLS promotes environmental responsibility and aims to reduce the environmental impact of its business activities.
- GLS has a zero-tolerance policy regarding corruption of any form.

Every GLS employee is expected to uphold these ethical standards. Anyone who witnesses or suspects a violation of these standards is encouraged to raise his/her concerns via their line manager, Compliance Manager or the GLS whistleblowing hotline.

Employees

GLS Group recognizes that the competence and dedication of its employees form the foundation of its success. It has established a set of common rules and regulations in order to ensure a positive working environment.

Respect and Diversity

As a multinational company, GLS respects and appreciates the cultural diversity of both its workforce and customer base.



Each employee of GLS has a personal responsibility for treating colleagues, business partners and customers with dignity and respect. Illegal discrimination with respect to gender, race, religion, age, political or trade union activities, disability, sexual orientation, national origin or any other characteristic protected by law will not be tolerated.

Health & Safety

GLS is committed to providing a safe working environment and ensures that all necessary safety standards and all legal requirements are met.



GLS employees are expected to:

- Strictly adhere to all occupational Health & Safety regulations.
- Report any observed deficits without delay.
- Promote awareness of Health & Safety standards also among businesspartners.

Communication and Confidentiality

As a basic principle, all internal GLS information not explicitly defined as public is to be treated as confidential.

Corporate and commercial communication with the media and the general public is the responsibility of the central communication department.

GLS employees communicating privately on matters regarding the company should:

- Clarify that they are speaking on their own behalf.
- Not hide their affiliation with GLS.
- Remain civil throughout any discussion.

Information Security

All information which is collected and/or processed in the course of GLS' business dealings must be safeguarded from abuse and unauthorized access.

Employees are required to comply with information security practices that protect confidential and/or proprietary information at all times.

Privacy and Data Security

GLS collects, processes and uses personal data in order to provide its logistics services. In its treatment of personal data, GLS strictly adheres to all applicable laws and regulations.

Employees dealing with personal data must complete all necessary training and adhere to all relevant internal guidelines.

Insider Information

In the course of their business dealings for GLS, employees may receive access to non-public information about any GLS entities, our parent company Royal Mail Group, our customers or other business partners.

GLS employees are prohibited from using any such non-public information for their own financial or commercial gain or in order to achieve such financial or commercial gain for any third parties.



Company Property & Funds

Unless explicitly otherwise indicated, all GLS Group funds and property are to be used for company purposes only.

Accounting Standards

All records must be accurate and need to reflect the true nature of the conducted transactions.

Customers

GLS places the highest possible priority on satisfying its customers and prioritises the customer focus across all its business processes.

Service Standards

GLS' primary aim is to deliver consistent and reliable service to all customers.

In dealing with customers, all GLS employees are expected to provide:

- prompt and appropriate solutions, and
- a courteous way of engagement.

Quality

GLS Group's commitment to quality is central to its business and GLS is proud to be among the quality leaders in Europe. In order to achieve the highest quality standards possible, GLS works constantly to improve its processes for the benefit of all customers.

In line with this commitment, all GLS employees are expected to:

- Observe all defined quality standards.
- Ensure that business partners adhere to all established standards.
- Apply corrective measures whenever necessary.

GLS has a zero-tolerance policy towards corruption and bribery in any form.

GLS employees may never offer or grant an improper personal benefit, whether directly or indirectly, in anticipation of or return for an illicit behaviour or advantage. The guidance, value limits and approval processes set out in the GLS Gifts & Hospitality Guideline must be strictly adhered to at all times.

GLS also does not tolerate that consultants, agents, external sales representatives or any other business partners acting on the company's behalf offer or grant such improper benefits in the course of their business dealings for GLS.



Business Partners

In order to perform its services, GLS relies on a variety of business partners, such as suppliers, sub-contractors and other collaborators. GLS appreciates their importance for its operations and values their contribution to its success.

To enable successful long-term cooperation, it is crucial that all GLS employees treat GLS' business partners with respect and integrity, and abide by all applicable internal and external rules that govern relationships with them. In return, GLS Group must be able to trust that they will demonstrate the same attitude in their conduct towards GLS and in the services they perform on GLS Group's behalf. It

is therefore GLS Group policy to associate itself only with business partners who demonstrate an equally high standard of business practice and compliance.

Selection of Business Partners

GLS is bound by strict standards of business practice. Working with business partners who do not hold themselves to the same high standards can damage our reputation and risks involving GLS in liability for their misconduct.

Every GLS employee who is responsible for the selection of business partners who may be acting on GLS' behalf must therefore:

- Strictly observe the applicable business partner selection processes.
- Ensure appropriate instruction and guidance to relevant business partners.

~~Adequately observe and monitor their business~~

Conflicts of Interest

The business behaviour of all GLS employees and representatives must always be guided by the best interests of GLS Group. Business decisions or actions may not be unduly influenced by personal interests of the relevant employee.

All GLS employees must therefore:

- Make their business decisions based on objective criteria such as price and quality, not personal interests or relationships.
- Proactively inform their line managers of any circumstances which may impinge upon their ability to take business decisions or actions on behalf of GLS impartially.



Gifts, Hospitality and other Benefits

Gifts, hospitality or other benefits received from a business partner can exert an improper influence on the recipient.

GLS employees may therefore only accept gifts, hospitality or other personal benefits

- in line with the guidance, value limits and approval processes set out in the GLS Gifts & Hospitality Guideline, and
- if there is not even the appearance of the benefit being given in return for or in anticipation of an illicit behaviour or advantage to the business partner.

Competition Law

The rules of competition law and fair trading protect fair competition in the market. Violation of these rules can lead to severe fines and cause grave damage to a company's reputation. GLS' stance on this is clear: We adhere to the applicable regulations without exception.

Every GLS employee must therefore strictly observe the rules of the GLS Competition Law Policy. In particular, they must never

- illegally seek to procure commercially sensitive information,
- exchange commercially sensitive information with competitors,
- enter into prohibited anti-competitive agreements or other arrangements with competitors, customers or any other business partners, or
- participate in trade associations, lobbying groups or external bench-marking activities without prior approval by the relevant country management and appropriate instruction by the responsible Compliance Manager or Legal Department.

General Public

GLS Group is convinced that social responsibility is a key factor for long-term success. GLS strictly adheres to all laws and regulations protecting the interests of the general public. Moreover, GLS engages in various activities benefitting society at large.



Corporate Social Responsibility

GLS takes seriously its social responsibility towards the communities in which it conducts its business. It has established the ThinkResponsible initiative, coordinating its corporate responsibility activities on a group-wide level.

▶ All GLS employees are encouraged to propose ideas supporting this initiative.

Donations

As a responsible member of society, GLS supports appropriate charitable causes with donations.

The following points in particular must be observed in respect of any donation:

- Donations may only be made to charitable causes whose purpose is in line with GLS' corporate culture and values.
- Political donations are not permissible.
- Donations may not be made in return for a commercial benefit.
- All donations must receive prior written approval in line with the requirements of the GLS Gifts & Hospitality Guideline.

Dealing with Public Officials

Public officials are expected to act in the public interest without influence from private businesses.

Any impression that GLS, a GLS employee or a business partner acting on GLS' behalf is attempting to illicitly influence a public official is to be strictly avoided:

- Gifts, hospitality or other material or immaterial benefits towards public officials are therefore generally prohibited.
- Any exceptions require prior written approval of the responsible Compliance Manager.

Environmental Standards

GLS Group is committed to the values of sustainability and environmental protection. Based on a group wide environmental management system, certified according to ISO 14001, GLS has established processes aiming to reduce the environmental effects of its business activities in both its purchasing and operational activities.

Every employee has to adhere to all processes, which actively conserve resources and reduce the environmental impact of our activities.



Money Laundering

Money laundering refers to the introduction of financial assets proceeding from corruption or other illegitimate sources into the legal economy.

GLS intends to only associate itself with customers and other business partners whose business and financial activities comply with applicable laws and takes appropriate steps to prevent its business processes being abused for money laundering purposes.



All GLS employees must comply with applicable anti-money laundering regulations. In particular, GLS employees must:

- Comply with applicable accounting principles for cash and other transactions.
- Report any suspicious conduct of customers or any other business partners to the responsible Compliance Manager.

Sanctions Regulations

A number of countries and international organizations impose sanctions, i.e. restrictions on providing certain goods, services, finance and/or knowledge to specific individuals, organizations or countries, particularly those suspected of supporting terrorism.

GLS complies with all applicable sanctions regulations and has implemented technical processes to ensure appropriate screening of relevant entities and natural persons.

All GLS employees with relevant responsibilities must:

- Ensure that master data regarding all relevant parties are recorded correctly and completely, to enable appropriate screening.
- Never attempt to circumvent sanctions regulations.
- Inform the responsible Compliance Manager if they suspect that a customer or other business partner is violating relevant sanctions regulations.



Questions and Concerns

All GLS employees are encouraged to turn to their Line Managers or responsible Compliance Managers with any questions they might have regarding the aforementioned rules as well as any concerns regarding violations of applicable law, this Code of Business Standards or other internal regulations.

Concerns regarding criminal offences or other serious incidents such as anti-competitive practices, bribery, discrimination or harassment, financial malpractice or practices that might put individuals of the environment at risk may also be reported to the external whistleblowing hotline:



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GLS is committed to ensuring that employees can report any concerns in complete confidence. All reports are taken very seriously and will be investigated accordingly. Retaliation, in any form, against anyone who in good faith reports a concern is strictly prohibited.