 <b>Universal Transport</b> ... don't worry, be <i>heavy</i> !	Grundlegender Hinweis GH 565 <b>Code of Conduct</b>	Ausgabedatum:	25.10.2015
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## **Our guidelines on honorable conduct and sustainability of the Universal Transport Group GmbH**

The Universal Transport Group GmbH including its affiliated companies (hereafter together referred to as „Universal Transport“) understands sustainability and ethically responsible actions as an essential part of our business processes.

As a global logistics enterprise we undertake among other things heavy load transports and extensive logistics projects with the highest competence and innovation standards. In order to do so we obtain deliveries and services from suppliers and sub-service providers that have been selected carefully.

The basis for our business activities is a business management that is geared to a responsible and long-term adding value. Because of this we involve suppliers and sub-service providers directly into our strategy of sustainability. With regards to our procurement activities and the awarding of orders we also pay attention to social and ecological aspects like human rights, working conditions, prevention of corruption and environmental protection besides our procedural, economic and technical criteria.

Within the area of conflict between product / service, market, region and process quality, reliability, costs, sustainability and innovation represent for us the main factors for the selection of suppliers and sub-service providers and their assessment.

Universal Transport expects from his suppliers and sub-service providers that their activities correspond to the individual valid national laws, to the principles of the „United Nations Global Compact“ and to the Universal Transport Code of Conduct. In addition it is expected that they introduce appropriate processes or that they already implement them. These processes should support the compliance with the valid laws in their companies and should support a continuous improvement regarding the principles and requirements of the Code of Conduct of Universal Transport.

Universal Transport expects furthermore from his suppliers and sub-service providers that they make sure that their associated companies also observe and respect the described principles and requirements.

According to this declaration „associated companies“ are characterized by companies that are indirectly or directly at least fifty per cent (50 %) economically owned through the capital stock of the other company.

### **Below our principles of behavior within the commercial environment:**

#### » Prohibition of Corruption and Bribery

Universal Transport expects from his suppliers and sub-service providers that they do not tolerate corruption no matter in which form or characteristic and that they ensure the compliance with the conventions of the United Nations (UN) and the Organisation for Economic Cooperation and Development (OECD) for the fight against corruption and the appropriate anti corruption laws within their company. They ensure in particular that their employees, sub-contractors or representatives do not offer, promise or grant advantages to Universal Transport employees or their associated ones with the aim to receive an order or another privilege within the business connections.

#### » Money Laundering

Universal Transport expects that his suppliers and sub-service providers observe the relevant legal obligations for the prevention of money laundering and that they do not take part in money laundering.

» Avoiding of Conflicts of Interest

Universal Transport expects that his suppliers and sub-service providers only take decisions, that are related to their business activities with Universal Transport, based on objective criteria. Already the approach of conflicts of interest with private concerns, different economic or other activities, also from relatives or other related parties or organisations will be avoided

» Free Competition

Universal Transport expects that his suppliers and sub-service providers play fair while they compete and that they take the valid antitrust code into account. Suppliers and sub-service suppliers neither join illegal cartel arrangements with the competition nor use abusively a possible existing market dominating position.

» Protection of the Environment

Universal Transport expects that his suppliers and sub-service providers comply with the individual valid national environmental laws, regulations and standards.

» Handling of People

Universal Transport expects that his suppliers and sub-service providers observe the fundamental employment rights of the individual valid national law. Universal Transport expects in addition the acceptance of the core working standards of the International Labour Organisation (ILO) in consideration of the laws and forms of organisation that are valid in the different countries and locations.

» Child Labour

Universal Transport expects that his suppliers and sub-service providers forbid and neglect all kind of child labour in their companies. According to the ILO legal age convention no. 138 child labour is all kind of work that is done by employees who are younger than 15 years or younger than the age at which the compulsory school attendance ends.

» Discrimination

Universal Transport expects that his suppliers and sub-service providers support equality of opportunities and that they prohibit discrimination during the placement of employees as well as during the promotion or the granting of training schemes.


No employee may be discriminated because of his sex, the age, the colour of the skin, the culture, the ethical origin, the sexual identity, a disability, the religious affiliation or philosophy of life.

» Compulsory Labour

Universal Transport expects that his suppliers and sub-service providers do not allow compulsory labour in their companies.

» Compensation and Working Hours

Universal Transport expects that his suppliers and sub-service providers meet the individual valid national working hour law. In addition it is expected that the employees of the suppliers and the sub-service providers receive a compensation that complies with the individual valid national laws. Universal Transport refers explicitly but not exclusively to the obligation to comply with the „Forming of a General Minimum Wage Act“ („Gesetz zur Regelung eines allgemeinen Mindestlohns“) (Minimum Wage Law – MiloG) in the Federal Republic of Germany.

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» Freedom of Association

Universal Transport expects that his suppliers and sub-service providers respect according to the national law the rights of the employees to form a employee representation and to conduct collective negotiations.

» Health Protection and Occupational Safety

Universal Transport expects that his suppliers and sub-service providers comply with the individual valid national health protection and occupational safety law. In addition it is expected that the suppliers and the sub-service providers establish and exercise an adequate occupational safety management (e.g. ISO 45001). This comprehends on one hand the containment of really existing and potential occupational safety risks and on the other hand the training of employees in order to prevent at the best possible rate accidents and occupational illnesses

» Vendor Relationship

Universal Transport expects that his suppliers and sub-service providers passes all principles and requirements that are described in this document on to their sub-service providers and suppliers and to consider them as well while they select. The suppliers and sub-service providers encourage their sub-service providers and suppliers in complying with the described human rights standards, working conditions, prevention of corruption and protection of the environment within the limits of their contractual obligations.

» Compliance with the Universal Transport Supplier Code of Conduct

The compliance with the principles and the requirements of this Universal Transport Supplier Code of Conduct by the suppliers and sub-service providers will be confirmed by signature on the „Declaration of the Supplier and Sub-Service Provider“ (FB 333) which is a component of the mutual business relationship.

Each breach against the principles and requirements that are listed in the Universal Transport Supplier Code of Conduct will be considered as a main disturbance of the contractual relationship on the part of the supplier and / or sub-service provider.

When suspecting a non-compliance of the described principles and requirements of the Universal Transport Supplier Code of Conduct Universal Transport reserves the right to request information regarding the corresponding issue. In addition Universal Transport has the right to terminate exceptionally and without notice a single or all contractual relationships with suppliers and sub-service provider who demonstrably did not comply with the Code of Conduct of Universal Transport or who do not seek and implement improvement measures.

» References

- Global Compact of the United Nations: [www.unglobalcompact.org](http://www.unglobalcompact.org)
- General Declaration of Human Rights: [Microsoft Word - Allgemeine Erklärung der Menschenrechte.doc](#)
- International Working Standards (ILO): [www.ilo.org/global/standards/lang--en/index.htm](http://www.ilo.org/global/standards/lang--en/index.htm)
- International Organization for Standardization (ISO): [www.iso.org](http://www.iso.org)

» Point of contact for identified violations

Violations can be reported via the central Gruber Logistics website under "Whistleblowing": [Logistics Company from Ora \(BZ\) - GRUBER Logistics S.p.A. \(gruber-logistics.com\)](http://Logistics_Company_from_Ora_(BZ)_-GRUBER_Logistics_S.p.A._(gruber-logistics.com))