

4flow code of conduct

shaping the future of supply chain



4flow code of conduct

1. Introduction

From its beginnings in 2000, 4flow has grown to become a leading provider of supply chain consulting, software and fourth-party logistics (4PL) services.

We have always been guided by a distinct vision and set of values and ethical principles. Our commitment to the highest standards of integrity, transparency, and ethical conduct is the foundation of all our business practices. As demonstrated by our participation in the UN Global Compact (see annex), sustainability and corporate responsibility are fully integrated in our business practices.

The 4flow vision and values shape the way we treat our customers, business partners, service providers, and coworkers worldwide.

The 4flow vision

4flow is the trusted global leader in end-to-end supply chain optimization.

Our dedication drives us to make a positive, sustainable impact for our customers, the environment and society.

The 4flow values



Customer centricity

Our products and services make a valuable impact. We strive to go beyond expectations, ensuring customer satisfaction. We evaluate our performance from our customers' perspective.



Excellence

We are dedicated to achieving the best results. Each 4flow team member shows commitment and takes responsibility for their actions. Excellence is measured by results. By learning and collaborating, we excel as individuals, as teams and as an organization.



Respect

Respect, tolerance and appreciation shape our conduct and mindset. A culture of trust, diversity and individuality makes us successful.



Sustainability

We think, act and make decisions with the future in mind. Everyone at 4flow looks at the big picture. We stay true to our values as we grow.

This code of conduct reflects these values. It outlines the principles and standards that guide our actions and decisions. It applies to every 4flower. Compliance with this code is mandatory and integral to our corporate culture.

For our suppliers, corresponding rules are defined in 4flow's supplier sustainability policy.

2. Compliance with laws and regulations

We rigorously adhere to all applicable national and international laws, including anti-corruption, data privacy, trade, export control and labor regulations. We ensure that our business activities comply with the legal standards and requirements of each country we operate in. Our employees are responsible for complying with all internal directives and policies as well.

3. Anti-corruption

We maintain a zero-tolerance approach to all forms of corruption and bribery. We comply with all applicable anti-corruption laws and regulations. We do not offer, promise, or give anything of value to improperly influence a decision or gain an unfair advantage. And we do not request, agree to receive, or accept anything of value in exchange for an improper advantage or influence. All employees and business partners are expected to act in good faith and uphold the highest standards of honesty and integrity. Any suspicion of bribery or corruption must be reported immediately through our designated reporting channels.

Further details are set out in 4flow's anti-corruption policy.

4. No conflict of interest - gifts and benefits

While reasonable and proportionate gifts and hospitality can be part of building business relationships, they must never be used to improperly influence decision-making.

We expect all employees and business partners to avoid any situation where personal, financial, or other interests conflict with 4flow's interests. Any potential conflict of interests must be disclosed and addressed promptly. Further details are set out in 4flow's anti-corruption policy.

5. Prohibition of money laundering, financing of terrorism, and other illegal activities

4flow is fully committed to the international fight against money laundering and the financing of terrorism.

Team members do not engage in or tolerate any form of illegal activity at the workplace or otherwise in connection with 4flow.

6. Fair competition

We compete fairly, openly, and independently, and comply with all applicable competition and antitrust laws in the jurisdictions where we operate. We avoid agreements or discussions with competitors about prices, market allocation, or bid rigging. We refrain from exchanging sensitive commercial information with competitors and reject any form of collusion, price fixing, or other unfair trade practices.

7. Employee Conduct

Equal treatment and non-discrimination

We foster a culture of inclusion, diversity, and equal opportunity. We actively promote diversity in hiring and career advancement. Every employee is treated with respect, dignity, and fairness, regardless of race, ethnicity, religion, gender, gender expression, age,

national origin, disability, marital status, sexual orientation, or any other characteristics. We promote equal opportunities and are committed to providing a work environment free from discrimination, harassment and retaliation. All employees are expected to contribute to this workplace culture.

Culture of learning and professional development

4flow fosters a culture of learning in which feedback from all stakeholders is encouraged. The main criteria for professional development are the team member's performance and potential with regard to the requirements of the position they hold.

Fair labor practices and human rights

We uphold the highest standards of labor practices and respect for human rights in all our operations and those of our partners. We ensure reasonable working hours and compliance with applicable employment laws and respect employees' right to freedom of association. All team members have the right to appropriate compensation; pay and other benefits shall comply, at a minimum, with the respective local legal standards or those of specific national economic sectors, industries, and regions.

Further details are set out in 4flow's Declaration of Principles for Human Rights.

Occupational health, safety and well-being

The health, safety, and well-being of our employees are paramount. We provide a safe and healthy working environment, comply with all applicable health and safety regulations in the workplace, and encourage employees to promptly report any health or safety concerns. We also promote mental and physical well-being of our employees by providing resources for support and self-care.

Guidelines are in place for safe and effective remote and hybrid work. We encourage work-life balance and support flexible working arrangements where possible.

8. Environmental responsibility

4flow is committed to environmental sustainability. In the course of their work, team members strive to safeguard natural resources and protect biodiversity. To reduce the environmental impact as much as possible, team members plan, design and operate with energy efficiency in mind. When procuring suppliers, advertising material or external services, team members consider sustainable options that minimize waste and reduce consumption.

With the supply chain solutions we develop for our customers, we strive to reduce the carbon footprint in operations, transport and logistics.

9. Conduct within society

Charitable donations

4flow is an active corporate citizen, and we demonstrate our commitment in a variety of ways. Charitable donations and other forms of corporate citizenship are carried out solely in the interests of the beneficiaries. We do not make any financial contributions - particularly in the form of donations or sponsorships - to domestic or foreign political parties, organizations, or candidates.

Public behavior and communication

We respect the right to free speech and the protection of personal rights and privacy. All team members are aware that they represent 4flow in both private and professional settings. As such, they are responsible for safeguarding the reputation of the company by conducting themselves appropriately in public.

10. Confidentiality and data protection

We are committed to protecting the confidentiality, privacy, and security of all sensitive and proprietary information. Employees are expected to safeguard both internal and external data and comply with applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) and similar frameworks in other regions. Data protection training is mandatory for all employees.

11. Accounting and financial reporting

We keep our financial transactions and records complete, accurate, and transparent. We have appropriate controls in place to create, store and maintain business records correctly and securely.

4flow's financial reports comply with applicable legal and regulatory requirements. Our books and records are maintained in accordance with generally accepted accounting principles and financial reporting standards to ensure the accuracy and integrity of our financial reporting.

We are aware of our financial responsibility and strive for open communication with all authorized stakeholders. We believe in the social value of transparency and try to communicate this to the outside world.

12. Intellectual property

We respect and protect intellectual property rights. Employees must safeguard 4flow's and our customers' intellectual property.

The property, installations, business documents, work tools, and other valuable material of 4flow are not used for personal purposes or made available to third parties if this would negatively affect the interests of 4flow.

13. Implementation and communication

This code of conduct will be communicated within the 4flow Group. All employees are expected to familiarize themselves with this code and to adhere to its principles. In case of uncertainty, employees can seek guidance from their supervisor or the Chief Compliance Officer.

Upholding this code of conduct is a shared responsibility across 4flow. Managers+ are responsible for setting the tone and leading by example.

14. Consequences of non-compliance

Violations of this code may result in legal or regulatory sanctions for the affected team member, his or her colleagues, or 4flow as a company. In the case of severe misconduct, disciplinary proceedings by a regulatory body may result in a reprimand, fine, or withdrawal or suspension of authorization to conduct business for an entire 4flow entity or certain team members. Failure to comply also constitutes a breach of the affected team member's contractual obligations and may result in disciplinary actions, up to and including termination of employment.

15. Reporting and whistleblowing

We encourage all employees and business partners to report any concerns or potential violations of this code of conduct. Reports can be made through various confidential channels, including 4flow's whistleblower portal via The hive ([Whistleblowing](#)) or via our website ([Responsibility - 4flow](#)). No employee who communicates a bona-fide concern will be exposed to retaliation on the basis of such report, even if the concern proves to be unfounded. Such communication may be made anonymously. All reports will be taken seriously and investigated promptly, impartially, thoroughly, and in accordance with applicable laws and regulations. If necessary, appropriate remedial actions will be taken.

16. Contact Information

For questions or further information to this code of conduct, please contact the Chief Compliance Officer, Stephan Kappel (s.kappel@4flow.com), the Compliance Department (compliance@4flow.com) or the Legal Department (legal@4flow.com).

4flow is dedicated to continuous improvement in all aspects of our business. We are committed to continuously enhancing our ethical standards and practices. By upholding this code of conduct, we ensure that 4flow continues to contribute to the long-term success of the company and the trust of all stakeholders.

Last update: March, 2025

ANNEX: The Ten Principles of the UN Global Compact



Human rights

Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2

make sure that they are not complicit in human rights abuses.



Labor standards

Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4

the elimination of all forms of forced and compulsory labor;

Principle 5

the effective abolition of child labor; and

Principle 6

the elimination of discrimination with respect to employment and occupation.



Environment

Principle 7

Businesses should support a precautionary approach to environmental challenges;

Principle 8

undertake initiatives to promote greater environmental responsibility; and

Principle 9

encourage the development and diffusion of environmentally friendly technologies.



Anti-corruption

Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

