

CODE OF CONDUCT

1 GENERAL

Westfalia has strong values and beliefs. In the manufacture of our products and in providing our services, we are committed to fair business practices, strict compliance with applicable rights and laws, responsible social interaction – both among our staff and with our customers and business partners – and the protection of resources and the environment.

The quality of our products is influenced by a trusting partnership with our suppliers and service providers. They contribute to the quality which has been the hallmark of Westfalia's logistics systems for all of 50 years now. With this Code of Conduct, we underscore our commitment to apply our business principles to all stages of value creation. At the same time we hereby define our expectations for our business partners.

The Westfalia Code of Conduct applies across the Group to all our activities and business dealings at home and abroad. Of all rules that apply, including this Code of Conduct, those that provide the best possible protection for people, business practices and the environment will always have priority for us. We reserve the right to check our suppliers and service providers for compliance with the standards defined in the Code of Conduct. In case of non-compliance, Westfalia is entitled to terminate a contractual relationship immediately.

This Code of Conduct supplements the legal provisions and obligations, the agreements entered into with our suppliers and service providers, and Westfalia's Standard Terms and Conditions of Purchase.

2 LEGISLATIVE COMPLIANCE

1. Westfalia is committed to compliance with all applicable laws and regulations. We expect the same from our suppliers and service providers. We also pay particular attention to legislation governing the import, export, or domestic trade of goods, technologies, and services with a view to supplier relationships.

2. Westfalia promotes fairness and openness both towards its suppliers and its competitors. Any collusion between our employees and our suppliers and service providers that may unduly influence competition is prohibited. Together with our suppliers and service providers, we observe all national and international laws for the protection of competition.

3. In this context, Westfalia is strongly positioned against any form of bribery. Any form of tangible or intangible benefit granted in exchange for being given an unfair competitive advantage is forbidden.

4. Westfalia relies on long-term supplier relationships based on trust. We expect both sides to fully protect intellectual property rights and copyrights. Our suppliers and service providers are strictly prohibited from disclosing, duplicating, disseminating or altering our software or our intellectual property without our express consent. In addition, we mutually undertake to keep secret from third parties all proprietary and confidential information. This undertaking applies to all information not in the public domain and remains in effect beyond the termination of the supplier relationship.

3 SOCIAL RESPONSIBILITY

1. Westfalia respects the moral rights of all people with whom we come into contact in our business activities, both internally and externally. We expect our suppliers and service providers to observe the same strict standards in every respect.

2. Westfalia is committed to equal opportunities, providing all employees with a working environment marked by respect, tolerance, politeness, honesty and dignity. All actions in violation of this commitment are prohibited. We expect the same commitment to equal opportunities – both with regard to their own as well as our employees – from our suppliers and service providers.

3. Like any other company, Westfalia employs a large variety of people who each of them contribute to the success of our enterprise. We respect different cultural, ethical, and religious backgrounds and are committed to the equal protection principle regardless of nationality, origin, age, gender, appearance, disability, sexual orientation, religion, and belief or any other characteristic protected by law. We do not tolerate any discrimination against our employees. We expect our suppliers and service providers to display the same commitment to the equal protection principle in their own business practices.

4. Westfalia observes all legal provisions on occupational health and safety, protection from health risks at work, and ensuring fair working conditions including wages, working hours, and privacy protection. We ask the same of our suppliers and service providers.

5. Westfalia is strongly positioned against child labor and forced labor and requests absolutely the same from its suppliers and service providers.

4 PROTECTION OF THE ENVIRONMENT

There is only one planet Earth. With its space-saving and energy-saving logistics systems, Westfalia has always made its contribution to reducing the carbon footprint. We observe all applicable environmental legislation, regulations, and recommendations. In manufacturing in particular, we focus on sustainability, resource efficiency and eco-friendly disposal. In addition, we are committed to continuously creating and applying new approaches to improving our environmental performance.

We expect the same responsible treatment of the environment and compliance with the applicable environmental laws and regulations from our suppliers and service providers. This also applies to the handling, storage, and disposal of so-called hazardous substances.

Our aspiration, together with our suppliers and service providers, is to

- > reduce consumption of resources,
- > minimize waste, and
- > generally reduce the burden on the environment.

Thank you for your attention and your understanding. We look forward to maintaining a successful and respectful business partnership.