



CODE OF CONDUCT

Kurt Beier Transport A/S

A codex written with full support from the Board of Directors, in order to guide employees, suppliers and subcontractors to act accordingly

Context

Introduction from the CEO	2
History, Vision and Values	3
Customers assurance.....	4
Quality	4
Working environment	5
Environment	5
Social Media Policy	5
Anti-discrimination	6
Human rights	6
Modern Slavery Act	6
Business partners	7
Competition	7
Conflict of interest.....	8
Anti-Corruption and Bribery.....	8
Anti-corruption	8
Bribery	8
Whistleblower	9
Responsibility, implementation and compliance with the codex	9
Compliance	9
Mutual respect for the code of conduct	10

Introduction from the CEO



As being part of Kurt Beier Transport it's really important for us to tell our employees, the proudness of how we work. In line with our values, the code of conduct, covers the importance of human rights, workers rights, compliance with legislation, the environment consideration and anti-corruption.

The codex written, is of great importance, that action is behind the text, and therefore also this codex requires compliance in order to make a successful commitment to our employees and to our customers, who at least expect us to act in scenarios that doesn't comply to our codex.

Our code of conduct also aligns closely with the UN Global guiding principles on Business and Human Rights, International Labour rights and the UK Modern Slavery act. These guidelines help us with the right course of actions and helping us to understand the legal and ethical risks that may arise on our business approach. They assist us to meet our obligations and respect all individuals in our industry and others as well.

Karsten Beier

CEO, Kurt Beier Transport A/S

History, Vision and Values

Kurt Beier Transport is a haulier company founded in 1979 by Kurt Beier with headquarter in Esbjerg, Denmark. Kurt Beier was trained as a mechanic before he started his own company.

The company has since then expanded and grown from a small local transport company to one family owned Public Limited Company with subsidiaries in 4 countries, including Denmark, Lithuania, Poland and Romania.

With years of experience, Kurt Beier Transport has achieved outstanding professional know-how and expertise within the European market of temperature-regulated logistics of food.

In 2013 Karsten Beier took over Kurt Beier's post as the Kurt Beier Transport Group's CEO, and Gitte Beier became the Chairman of the Kurt Beier Transport board.

As a result the Kurt Beier Transport has become one of Denmark's largest transport companies.

As a professional transport supplier of food, non food products we are committed to our customers to provide professional transport services in which the temperature, time and costs must be under control.

Our mission is to offer the Clients complete and sustainable solutions of transport, and not at least be an integral part of our Clients' daily operations. Kurt Beier Transport strives constantly to develop and streamline our solutions so that we are always ready to meet the future needs and combat the challenges we face.



Our vision is to be a one of Europe's leading haulier companies. Kurt Beier Transport are aiming the preferred transport supplier for the discerning Clients.

We see changes in the market as the opportunities for growth and to apply our ability to develop and produce innovative solutions to meet our Clients' future needs.

Our values at Kurt Beier Transport are to be professional, efficient, innovative, service minded and ambitious!

Customers assurance

Kurt Beier Transport pursues and continually evaluates a systematic quality assurance effort that covers all aspects of the business. We must take a unified approach if we are to achieve our targets. We monitor and update our processes and governing documents on a regular basis. One of our guiding principles is to focus on continual improvements.

Being a customer of Kurt Beier Transport must be a simple and reliable proposition. Our customer relationships must be based on professionalism. Agreements with customers and other parties must be documented, and the internal decision-making procedure must be followed. Our goal-oriented working methods ensure that our services are based on the needs that our customers have identified in terms of communications and transport solutions. It follows that we must maintain an ongoing dialogue with our customers in order to be aware of their needs, preferences and points of view. Their input must be treated as a basis for improvement, and we must respond to them quickly, courteously and professionally. Customer satisfaction must be measured on a regular basis.

Based on their individual duties, all employees must contribute to the realization of Kurt Beier Transport's vision and keep the promises it has made to its customers. Applicable law, our agreements, internal regulations and processes must be followed. Employees must be involved in the continual effort to identify and adopt improvement measures. Management are responsible for providing the tools needed to make sure that, that happens. Good internal control based on analyses of risks and opportunities is required if we are to practice what we preach.

Quality

For Kurt Beier Transport quality in our daily work and services provided to our customers is essential, and therefor the correct guidelines towards our employees are of great importance to the management.

What we offer must be in line whit what we perform, and therefore we have spent years of learning and adapting to the quality asked by our customers. We ensure that our quality system is fully up today, and that all employees are trained in the overall guidelines, and detailed processes throughout the entire organization.

Our quality and service must be in line with our vision and mission statement, and any concern must be known accordingly for the management to act.

Working environment

For us a good working environment is essential, and in order to create and maintain a happy and successful environment, a number of criteria is key for Kurt Beier Transport to achieve the standards the management supports. This includes several objects in terms of environment as well as anti-discrimination and human rights.

Environment

Kurt Beier Transport aims at achieving a working environment that is convenient, both physically and mentally, for the employees to be in, and thus promote innovation and efficiency in line with Kurt Beier Transport's vision, mission and values.

Cooperation between colleagues must take place in good spirit, with respect and compassion for each other's differences and positions.



Kurt Beier Transport is a professional player within transport, which is dynamic and constantly evolving, therefore, the employees must always be prepared for changes in line with Kurt Beier Transport's future business development.

Job satisfaction is essential for Kurt Beier Transport, and all employees are praised in an open mindset in terms of stimulating own or team competences.

Social Media Policy

Kurt Beier Transport has a Social Media Policy, to ensure how our organization and its employees conduct themselves online. It's a safeguard for our brand and encourages our employees to responsibly share the company's message.

Our CEO is the superior responsible to enter any dialog with local or international news or media coverage.

Employees are prohibited to make any statements on behalf of Kurt Beier Transport A/S or other entities related to the group. Employees are prohibited to make any statements of any of suppliers, subcontractors, customers or business partners previous or present.

In such, that our brand is compromised, or in any matter violated in any negative fashion, Kurt Beier Transport serves the right, to get detailed feedback from any individual and or company. In such violation that Kurt Beier Transport see any major negative impact on our brand, Kurt Beier Transport serves the right to terminate any business corporation, supplier, subcontractor or customer.

Any breach of business corporation due to negative media coverage, can be terminated with immediate effect, no matter elsewhere written in contracts, as this code of conduct prevails any contract.

Anti-discrimination

Kurt Beier Transport provides equal employment opportunities to all employees, applicants, and job seekers, and is committed to making decisions using reasonable standards based on everyone's qualifications as they relate to a employment action (e.g., hiring, training, promotions).



No person shall be discriminated against employment or harassed because of race, color, religion, political position, sexual orientation, gender identity, national or ethnic origin, age, status as an individual with a physical or mental disability unrelated to ability, protected veteran status, military

status, unfavorable discharge from military service, citizenship status, genetic information, marital status, parental status, ancestry, source of income, credit history, housing status, order of protection status, actual or perceived association with such a person or other classes protected by law.

This policy includes the commitment to maintaining a work environment based on inclusion and free from unlawful harassment.

Human rights

Kurt Beier Transport supports and respects internationally recognized human rights and must not be complicit in violating them. We do not accept child labour, or any type of forced labor or penal servitude.

Kurt Beier Transport recognizes and supports equal human rights and is against discrimination, differential treatment, harassment, inappropriate or unreasonable interference with work performance and similar in employment and working conditions, whether based on race or gender, or sexual, religious or political orientation or ethnic or social background.

Kurt Beier Transport is against all kinds of forced employment and working conditions.

Kurt Beier Transport does not employ children and recognizes the framework for minimum working age for children set forth in the ILO conventions and that youth should work in different types of employment than adults.

The remuneration of Kurt Beier Transport's employees should meet or exceed statutory or agreed national industry minimum standards.

Kurt Beier Transport complies with the current national legislation and agreed standards relating to employee working hours.

Modern Slavery Act

As Kurt Beier Transport works in the UK as a hauler company, the UK modern slavery act, is something where we as a professional organization, and with a set of codex also implements a brief section of.

The section of UK Modern Slavery Act must maintain bullet points on how our organizations prevents any of our entities, suppliers or subcontractors of Kurt Beier Transport.

As the importance for our codex is to prevent abuse, slavery and unhuman working and living standards for our chain of corporation, we as a company do:



- Supplier audit, including quality systems, rest areas, living quarters, driver schools and mobile housing in form of the tractor unit.
- Ensure that our codex, policies and driver handbook, are present and known by the entire chain of any subcontractor, contracted by Kurt Beier Transport.
- Keep close dialog with all approved suppliers on any of their recruitment process for drivers.

Business partners

The essence of our business, is to show our commitment to any community or market we operate in. The business partners we contract or service, must be at least of same opinion or superior, to endorse not to undermine any points of this codex.

Our name and presence, should not have any negative publications of any form to any society, locally or internationally.

We take pride in our name, and act accordingly to achieve positive publication of our name. therefore we also choose our business partners accordingly.

Competition

Our view of fair competition must at any point be respected, and in line with legislation.

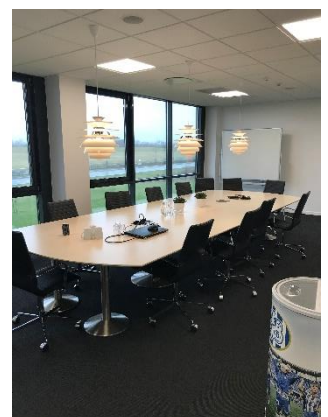
Any illegal price-fixing agreements are prohibited at Kurt Beier Transport.

Employees are not allowed at any point to participate in price-fixing. This concerns market sharing, limitations or controlling of markets.

It is prohibited to participate in any collusive agreements on essential terms, rates, fees, charges and conditions between competitors which could eliminate, prevent, restrict or distort fair competition. Also known as cartel agreements.

Its of importance that competition laws are always respected and strictly adhered.

Therefore, our employees must at any time, be aware of any restrictive impact on competition nationally or internationally.



If any such violation, employees are to act immediately by either reporting to whistleblower system or to nearest manager, to prevent any participation in such.

Conflict of interest

A conflict of interest occurs when an employee's obligations and interests when acting on behalf of Kurt Beier Transport conflict with his or her personal interests. It is crucial that employees conduct business activities in the best interests of the company. A conflict of interest may take many forms. It is the responsibility of all employees to exercise sound judgment regarding conflicts of interest.

Anti-Corruption and Bribery

As a modern company, it's of great importance that we work with business ethics and morality that is never compromised to any legislation, whether locally or internationally.

Anti-corruption

Kurt Beier Transport, its employees, suppliers, partners and other recipients of this codex must be committed to the high standards of integrity, honesty, and fairness in all internal and external relationships.

No employee shall directly or indirectly accept, solicit, or offer to pay bribes or other prerequisites even under unlawful pressure. This prohibition also applies to areas where such activity may not violate local law.

None of our employees are allowed to give or receive unjustified advantages from any public officials or employees in private companies.



Bribery

Kurt Beier Transport operates using the following specific rules to address anti-corruption, competition and conflict of interest issues. The principles do not prohibit normal and appropriate hospitality given or received. In case of doubt, our employees are responsible to make sound judgement, and report any such immediately.

No employee may accept or offer bribery of any kind.

No employee will be penalized or dismissed for refusing to pay a bribe, even if it may result in Kurt Beier Transport losing a business opportunity.

Bribery means any offer or acceptance of a gift, loan, fee, remuneration or any other thing of value to or from another person or entity as an incentive to influence or promote a certain act or omission which would not have been appropriate under normal conditions and in the absence of bribery.

In case any of our employee is asked to pay a bribe, the incident, including who asked for the bribe, must be recorded and reported to the management Whistleblower Program.

Whistleblower

At Kurt Beier Transport A/S we wish to be open and responsible.

We encourage employees to act as well, and we wish to have a culture that are as open as possible. We strive that our employees can express themselves for any concerns.

Therefore the whistleblower system has been commenced, to report any violation against legislation or any policies implemented at Kurt Beier Transport.

The Whistleblower is completely anonymous, and with the system in place, all employees and citizens can raise any concerns necessary.

The Whistleblower will be handled by quality dept, or by the quality manager in case that quality department has been raised to any concern.

Responsibility, implementation and compliance with the codex

The Board of Directors has the superior responsibility to comply with any of the stated in the codex. Quality department has the responsibility to ensure that guidelines provided from Board of Directors, are complied to any of the standards of our own certificates achieved over period, and the rules of the game according to written statements in this codex, complying to any of customer responsibility of their codex agreed upon, prior to any service carried out on their behalf.

All employees of Kurt Beier Transport, is fully responsible and professional to instruct subcontractors or others acting on behalf of our company, and not to neglect any of the written statements in this codex.

All employees, regardless of authority are professional and responsible to report any incidents, breach or neglect of this codex, or other quality standards held by Kurt Beier Transport A/S.

Quality department implements reports on all objects written in this codex, documents it and maintain it internally in our quality system, and is at any point available in the circumstance that it's relevant for any of our business partners to review. Documents are open in the respect that it concern the chain of relevant business partners, otherwise fully confidential with no relevance to the respected partners.

Compliance

At any point, compliance is important, as this document any progress being handled and maintained according to any code of conduct or demands from external business partners.

Compliance must be in direct course with any policies stated at Kurt Beier Transport, and the necessary demands from any of our customers, in of course ways that is comparable to any of the policies maintained at Kurt Beier Transport.

We document any progress, and we evaluate on the processes in matters of quality in reasonable periods. This to always ensure that compliance is up to date, and being handled in the most efficient way possible, according to any procedures and resources.

Compliance is a part of our customer care, and together with customers we audit in good manners, and make good and realized action plans to any raised concerns internal or external.

Mutual respect for the code of conduct

Kurt Beier Transport takes great pride in the codex, and at any point major breach of any kind to this codex, we serve the right to validate any such contract or agreement.

We understand the difficulties in the industry, as well as for competition, but Kurt Beier Transport embrace conditions according to legislation, but as well serves the individual Human Rights no matter origin, race, colour, religion etc. as written previously. Therefor this Code of Conduct prevails any contract, if neglect is compromised as a result of any audit, or continuously neglect from counterpart.

Kurt Beier Transport solely serves the right to consider the corporation at any time, and takes any breach very seriously, and even in matters of minor breach, where counterpart feel any unnecessary actions are being presented, Kurt Beier Transport can at any point terminate relationship, related to any violation of this codex.