



Code of Ethics



GEODIS
KEEP RISING

GROUP COMPLIANCE DEPARTMENT

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LETTER FROM MARIE-CHRISTINE LOMBARD, CHIEF EXECUTIVE OFFICER OF GEODIS



GEODIS is the growth partner of its customers, helping them overcome logistics constraints. In order to accomplish this mission, we act every day in accordance with the highest ethical standards, which of course include the strictest compliance with international laws and regulations. Our actions are also guided by a set of strong core values – customer commitment, innovation, trust, solidarity and passion – which form the foundation of our ethical culture.

This Code of Ethics is the keystone of our ethical culture and is central to our compliance program. It clearly sets out our values and our commitments as a company, as well as the principles guiding our actions. In a volatile and uncertain environment, it should serve as a compass and help us examine the ethical dimension in each situation and make the best possible decisions. We must always bear in mind that each of our decisions and actions, as well as those of the partners we work with, has or can have an impact on the reputation of GEODIS.

So ethics and compliance are everyone's business. This is why this Code of Ethics applies to each and every one of us: employees, members of the Executive Committee and the Supervisory Board, but also temporary or external employees working within the Group. It is aligned with the Code of Ethics of the SNCF Group, our principal shareholder.

At any point that you feel the need to do so, I urge you to make use of the GEODIS Ethics Alert System, the procedure for which is set out in the Code of Ethics, to express your concerns or report an infringement.

The GEODIS Management Committee and I are counting on you to fully adopt this Code of Ethics and to share it with our customers, service providers and subcontractors and widely around you. Being the growth partner of our customers and, more broadly, of all our stakeholders also means being a trusted partner. This trust is based on our ethical behaviour everywhere and at all times, without compromise. This is how we will always move forward, as we are urged to do by our Keep Rising brand.

MARIE-CHRISTINE LOMBARD
Chief Executive Officer of GEODIS

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1 COMMITMENTS TO SOCIETY

1.1 We comply with the laws and regulations

GEODIS complies with the laws and regulations applicable in the countries in which it operates as it grows its business. GEODIS therefore expects all of its managers and employees to have adequate and up-to-date knowledge of the rules governing their areas of activity, so as to be able to comply with them and decide when to seek advice.

Sometimes the content of this Code may not correspond exactly to the laws or customs in force in certain countries. In such a case, GEODIS will take the highest standard as a reference within the country, unless this results in an illegal activity. It will then be necessary to obtain the prior opinion of the Ethics Department.

1.2 We are committed to the Global Compact and Human Rights

When GEODIS signed the United Nations Global Compact in 2003, it formally undertook to integrate and promote the Compact's ten principles:

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.

Labour Standards

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: Elimination of all forms of forced and compulsory labour;
- Principle 5: Effective abolition of child labour; and
- Principle 6: Elimination of discrimination in respect of 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.

1.3 We are committed to sustainable and socially responsible development

We are working to promote more sustainable and socially responsible practices. This requires taking into account both the short-term and long-term interests of all stakeholders by ensuring that the decision-making includes economic, environmental and social considerations. The Group also ensures that it takes all useful measures to reduce environmental risks and their consequences and will ensure compliance with the applicable regulations.

1.4 We strictly prohibit child labour

Child labour is strictly prohibited, whether amongst GEODIS employees or those of all our partners, suppliers and subcontractors. The term "child" refers to any person under the age of 18. The minimum age will not be below the age at which compulsory schooling ceases, nor, in any case, below 15 years of age. Beyond that, the employment of children under the age of 18 must strictly comply with the law of the country in question as well as the rules of the International Labour Organisation ILO Conventions. Within this framework and in an effort to support legal learning programmes, GEODIS may involve

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children in work that does not affect their health and personal development and/or does not interfere with their schooling.

1.5 We will not tolerate any form of forced labour, modern slavery or human trafficking in our business activities

GEODIS prohibits all forms of forced or compulsory labour (e.g. slavery, human trafficking, bonded labour, forced or involuntary labour), whether as part of the performance of its own activities or those of its partners, suppliers and subcontractors. According to International Labour Organisation Convention n°29, the term forced or compulsory labour shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. For instance, when hiring, it is necessary that the employer conducts an identification check and requires the presentation of an original proof of identity, such as a passport or work permit. Nevertheless, the retention of the original presented document and the use of it to exert pressure on the individual, would be considered as one indicator of a forced labor situation. It is also necessary for the employment conditions to have been communicated to the worker in a language that he can understand.

1.6 We honour our commitments

The trust placed in us by our clients, employees, suppliers and partners is fundamental to GEODIS. It is based on our ability to make only those commitments that can be kept, and then keeping them. It is also essential that each of us honours the commitments made by GEODIS and does everything possible to safeguard the interests of the Group and all of its employees.

2 MAIN RULES OF BUSINESS CONDUCT

2.1 Working together at GEODIS

2.1.1 We ensure fair, impartial treatment and equal opportunities

In our determination to offer equal opportunities for promotion to all our employees, we guarantee fair, equitable and impartial treatment, both at the time of hiring and over the course of an employee's career. Each manager and employee will notably ensure that he avoids any situation of discrimination or harassment, as described in the following principles of this Code.

Favouritism will also be avoided (notably with regard to cases in which personal ties could influence – or be seen as influencing—a supervisor's decision).

2.1.2 We respect diversity and condemn all forms of discrimination

The diversity of our employees and their cultural backgrounds, which stems notably from the Group's widespread international operations, is a source of strength.

The principles guiding our actions and behaviour are built on respect for differences and a rejection of prejudice not only of origin, membership of an ethnic group or nation, but also of age, sex (including pregnancy, childbirth and everything related to it), gender, physical disability, family circumstances, religious belief, union membership or political convictions. The Group respects the beliefs and opinions of all individuals, as well as those of political, union and religious organizations, but does not have any particular affiliation and strives to maintain a neutral position. It is fundamental, as a minimum requirement, to comply with applicable anti-discrimination laws in each country.

2.1.3 We promote mutual respect and will tolerate neither harassment nor violence

As part of our commitment to providing employees with a workplace atmosphere that promotes working relationships built on trust, in a manner conducive to the development of GEODIS and of its employees,

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we reject all conduct that constitutes harassment, regardless of its form, the country or the culture; Compliance with the laws against moral or sexual harassment is therefore an essential minimum. No verbal behaviour or gesture liable to create an intimidating, hostile or offensive working environment will be tolerated. Threats, intimidation and acts of physical or moral violence within a business framework or between employees are not acceptable in any way.

2.1.4 We provide a safe and healthy working environment

One of our priorities is to provide everyone who works for GEODIS with a working environment that safeguards their health and safety.

Everyone throughout the chain of command has a duty to contribute to this goal at all times, by behaving responsibly such as to ensure that their decisions and actions do not entail any risks, either for themselves or for others, and by rigorously enforcing the rules of hygiene, health and safety applicable to their entity.

With this in mind, we do not accept that any work be performed under the influence of alcohol or other drugs, legal or otherwise, or any substance that could significantly affect the performance of tasks critical to everyone's safety.

Accordingly, we will ensure that no service is performed if the corresponding entity and its employees do not have the appropriate licences and training or if the safety and health of employees and populations could be jeopardized (chemical hazards, risk of conflict, etc.).

GEODIS will ensure that subcontractors and other operators contracted by the Group also meet all these conditions.

2.1.5 We protect the privacy of personal data

We respect individuals and protect each person's right to privacy in accordance with the GEODIS Data Protection Principles implemented for this purpose.

We undertake to treat personal data as confidential and to protect such data to the utmost in compliance with the applicable laws and the agreements with our commercial partners.

2.1.6 We respect personal commitments provided they do not involve the Group

The Group respects the personal commitments of employees who take part in or wish to take part in collective and/or public life. As such, any employee is naturally free to participate, in a private capacity, in charitable, associative, sporting or political activities. However, these employees will ensure that these personal commitments do not result in liability or reputation risks for the Group or any of its entities.

2.1.7 We fulfil our employment contracts in good faith

We consider that each individual's loyalty is reflected through adherence to the Group's principles, rules and commitments, but also in the full-time exercise of his function, which is incompatible with a second professional activity or with the operation of a business that requires an active investment on the part of the employee or could potentially generate a conflict of interest with the Group.

This particularly concerns managers and directors. Any exception must be expressly identified and authorised by the line manager; the Compliance Department must also be informed.

2.1.8 We avoid conflicts of interest and situations liable to be perceived as such

A conflict of interest is a situation occurring when an individual—while in the performance of his or her duties—has an undisclosed economic or personal interest in a transaction or situation that could adversely affect the Group.

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Each employee owes an obligation of loyalty to the employer. As a consequence, each employee must exercise sound judgement, in relation to his position and responsibilities within the Group, in order to make choices that do not come into conflict with the legitimate interests of GEODIS.



Below is a non-exhaustive list of situations considered unacceptable:

- For management officers: the holding of significant direct or indirect interests in a company listed amongst the current or potential partners (clients, suppliers, subcontractors, etc.) or competitors of GEODIS; this also applies to a situation in which an employee has decision-making powers to sign major contracts with a current partner on behalf of GEODIS;
- GEODIS employees using their authority to influence Group decision-making in such a way as to obtain an undue advantage (financial or otherwise) for themselves, a family member, or a person or legal entity to which they are affiliated or have close links;
- The use of confidential information from GEODIS in such a way as to obtain an undue advantage (financial or otherwise) for themselves, a family member, or a person or legal entity to which they are affiliated or have close links;
- Acting as a consultant, employee, officer, director, administrator or shareholder for a competitor, supplier or client.



Other situations that may represent a conflict of interest:

- A situation in which personal ties (relationship, family, fraternization outside work, etc.) might interfere with an employee's ability to do his or her job, e.g. two individuals with close personal ties work in the same department and one is required to supervise the other, or two such individuals being involved in a process that requires clear segregation of duties: investments, treasury, contracting, etc.
- The employee has access to confidential GEODIS information that could be of value for his or her personal relations (relationship, family, fraternization outside work, etc.);
- If the employee's personal interests were to become public, the information would be embarrassing for GEODIS.

Benefiting personally from a position or a business relationship at GEODIS may be deemed an abuse. The appearance of a conflict of interest can also have damaging consequences for GEODIS, in terms of reputation, business opportunities and/or legal action.



Employees who find themselves in a potential conflict of interest must :

- notify their hierarchical superior and the entity's director, and
- inform the Regional Compliance correspondent, who will then contact the GEODIS Compliance Department.
- If the employee is allowed to continue this relationship, he will have to adjust its organisation so that decisions are made in the best interest of the company, or else put an end to the situation.
 - In the case of a continuation, the director of the entity will have to make sure that the recommendations are implemented and that the situation is transparent to other colleagues within the entity.

Similarly, any member of personnel involved in the decisions of a State, government agency public institution or local authority must refrain from taking part in a decision of that body liable to concern the Group or one of its entities (as in, e.g., the awarding of a licence, a permit or a contract).

The use of Group funds to finance political parties, foundations or associations of a political nature, directly or indirectly, is strictly forbidden.

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2.2 Operating our business ethically

2.2.1 We do not tolerate bribery in any form

GEODIS undertakes to fight against bribery and corruption and to comply with the Organisation for Economic Co-operation and Development (OECD) convention and national laws (Sapin II Law in France, the Foreign Corrupt Practices Act in the US, the UK Bribery Act 2010, etc.).

Bribery includes:

- offering, promising, granting, consenting to or authorising, soliciting or accepting a solicitation, directly or indirectly,
- an inducement, that is, anything of value (including money) intended for a third party (public or private person)
- in order to influence a business decision or transaction, to do or not do something, to grant or refuse what he should have done by virtue of his duties.

GEODIS strictly prohibits all acts of bribery (including facilitation payments and influence peddling). This prohibition applies both directly and through a third party, in commercial relations and in relations with public officials, politicians or political parties.

GEODIS has set up a comprehensive programme to prevent and detect behaviour that could be considered as bribery or influence peddling.

For information purposes, all of the rules relating to this principle are detailed in the Anti-Bribery and Corruption and influence peddling Policy; they are additional to the Internal Rules, in accordance with laws.

2.2.2 We do not support or facilitate money laundering or illegal practices in any way

The principle is to avoid involving GEODIS in any money laundering operation or any illegal transactions. Money laundering is a process in which funds obtained through illegal means (e.g. drugs; bribery; the trafficking of humans, organ or weaponry; prostitution; the financing of terrorism; tax evasion, etc.) are concealed and transformed into ostensibly legitimate money or other assets.



In some contractual, invoicing or payment schemes, the Group may be suspected of complicity, even if it is unintended. Some red flags and internal control points include:

- Registration in a country having no link with the material place of performance of the service and/or considered to be a tax or financial haven ("offshore account");
- Third-party holder of an account bearing a name that is different from that of the company, especially in the case of an individual;
- Unnecessary or unexplained services, transactions or intermediaries with very little information concerning the identities of the parties.

If you suspect that money laundering is taking place, please immediately contact the Compliance Department.

2.2.3 We do not accept the practice of accepting or giving gifts or favours liable to exert undue influence on their recipient

Gifts and hospitality (including business meals, entertainment and travel expenses) can make a legitimate contribution to good business relations and may also be a matter of professional courtesy. Nevertheless, in some cases, they may be interpreted as constituting bribery or giving rise to conflict of interest situations.

As such, whether offered or received, gifts are prohibited.

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GEODIS authorises invitations, whether offered or received, up to a maximum limit of €100 per person and per transaction, provided that they are directly related to an established business relationship and that they remain occasional.

They are prohibited in the event that they involve a public or similar official.

In no case should you accept an invitation that would make you feel embarrassed were it to be made public. They must also be considered as unacceptable if they put their recipient in a position of obligation, or if they might be considered as having been given in exchange for a favour granted or solicited by GEODIS.

For information purposes, all of the rules relating to this principle are detailed in the gifts and invitations policy.

2.2.4 We believe in free competition and respect our competitors

GEODIS upholds the principles of free and fair competition in the conduct of all of its business, based on the competitiveness of its services.

GEODIS and its employees must therefore refrain from any unfair behaviour towards competitors and must not enter into illegal competition agreements or anti-competitive information exchanges amongst competitors.



The following practices are notably viewed as anti-competitive and hence non-compliant:

- The fact of submitting concerted bids in response to calls for tenders, or of consulting for the purpose of fixing prices, sharing markets, or eliminating a competitor;
- Abusing the state of economic dependency of a supplier or subcontractor, or abusing a dominant position in a market;
- The collection and use of data regarding third parties, and notably regarding competitors of GEODIS, outside of the legal framework in effect within the country.
- The denigration of our competitors or any manoeuvre targeting their staff (illicit poaching, bribery...) that could contribute to their disorganisation.
- The illegal obtaining and/or use of any information or product that is subject to intellectual property, confidentiality or professional secrecy for our clients, partners and competitors (these notions are clarified in § 2.4.1). As such, any newly recruited employee will refrain from providing such information in the same way as other GEODIS employees will refrain from requesting such information or deciding on recruitment with the prospect of being able to retrieve such information.

For information purposes, all of the rules regarding the practical implementation of this principle are detailed in the Fair Competition Policy.

2.2.5 We respect export controls and sanctions against countries, entities, individuals and goods

GEODIS complies with all applicable export laws and regulations adopted by the United Nations Security Council, the European Union, the United States and a number of other countries, that impose restrictive measures and sanctions (or embargoes) against countries, entities, individuals and goods. GEODIS helps its clients succeed by conducting trade that complies with these rules. This implies that all of its affiliates and business partners must also comply with these regulations.

For information purposes, all of the rules regarding the practical implementation of this principle are detailed in the Export control procedure.

2.2.6 We will not operate any business where there is a risk of being complicit in human rights abuse or breaching one of our ethics principles

We will not operate any business where there is a risk of being complicit in human rights abuse (child labour, forced labour and other forms of modern slavery, human trafficking, slavery, war, internal

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repression, terrorism, etc.), harming others or breaching one of the principles of this Code of Ethics. In this case, GEODIS will have the option of refusing to take on such operations. Group entities will therefore be particularly vigilant before authorising the transport or storage of the following goods: arms, ammunition or other sensitive war material (explosives, rockets, tanks, etc.); radioactive nuclear substances; biohazardous materials such as viruses, organs, blood and human remains. Some of them require prior authorisation in accordance with the Group's commitment rules set out in the GEODIS Book of Business Principles.

In case of doubts regarding the ethical nature of an activity, you can ask the Ethics Department for advice.

2.2.7 We respect and protect the property placed at our disposal

GEODIS supplies its employees with the equipment needed to perform their tasks. Our clients entrust their goods to us for transport or storage and, like our suppliers, they may also ask us to work in their premises and utilize their equipment.

In particular, we have a duty to protect and safeguard these assets and resources from any damage, theft or misappropriation, and in particular not to make use of them for personal purposes.

2.2.8 We look after the relationship with our subcontractors and suppliers and act as a responsible party in the supply chain

The relationships between GEODIS and its suppliers and subcontractors are essential to the quality of our services and the long-term success of our company. They are based on principles of impartiality, fairness and loyalty, and we respect their independence and identity. GEODIS will not abuse its market position in order to obtain privileged treatment or impose abusive conditions and will ensure that its suppliers and subcontractors are not in a situation of excessive economic dependency. Our suppliers are selected through open, transparent and competitive calls for tenders, during which all offers are compared and considered fairly and without favouritism.

GEODIS entities will also ensure that they implement reasonable vigilance measures in order to identify risks and prevent serious harm that could result from the activities of their subcontractors and suppliers, notably with regard to human rights and fundamental freedoms, the health and safety of persons and the environment, and more generally the principles provided under this Code. To this end, it is therefore essential to ensure control over all levels of subcontracting, to know all of the parties involved and to ensure the added value and relevance of each level.

For information purposes, all of the rules regarding the practical implementation of reasonable due diligence measures are detailed in the "Know Your Business Partner" Policy.

GEODIS is committed to combating all forms of illegal employment and it is not acceptable for subcontracting to be used outside of the legal frameworks in force or with the intention of circumventing them, notably if the implemented arrangement serves to cause harm to the employee with regard to legal provisions or collective bargaining stipulations.

These principles will also apply in cases in which a GEODIS entity is in the position of a supplier or subcontractor.

2.2.9 We protect business documents and data

The success of our operations also depends on our capacity to keep sensitive information confidential. It is strictly forbidden to divulge such information, or to use it for personal purposes.

We therefore have a duty to ensure that this information is divulged neither directly nor indirectly outside the Group, nor communicated to unauthorised Group employees. Vigilance in preventing disclosure must extend to all communication via personal and professional social media and networks.

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This confidentiality requirement continues to apply after a person has left GEODIS, and each of us undertakes, at all times, not to copy, reproduce, use, communicate, disclose or facilitate the publication or dissemination of such confidential information without prior formal authorisation.



Confidential information includes, but is not limited to, the following:

- strategic and marketing plans and business plans,
- employed technologies and software,
- service and product specifications,
- operational procedures,
- financial reports and financial, commercial, real estate, technical, strategic and profitability information,
- pricing and cost models and structures,
- information relating to clients, prospects,
- partners, subcontractors and suppliers,
- data relating to calls for tenders,
- contracts and commercial relations,
- trade secrets,
- trademarks and patents,
- know-how,
- legal proceedings and transactions,
- minutes of meetings,
- talks and negotiations,
- all data relating to employees and all personal data.

Each individual is required to identify information that is confidential and/or covered by business secrecy, and to treat it as such.

2.2.10 We communicate accurate, comprehensive, and timely information

The quality of our internal and external communications is essential to gaining the trust of third parties, and to our Group's ability to make the right decisions regarding present and future actions. This depends to a large extent on our having documents that are relevant, precise, accurate, and properly updated and preserved.

We are committed to maintaining the continuity and sustainability of our business. All necessary steps must therefore be taken to ensure that documents are properly communicated and conserved, to enable each member of personnel to be fully operational, and to enable the Group to defend its rights when the need arises.

More especially, the sound management of the Group and the disclosure of true and fair financial information depend on the accuracy and completeness of its accounting records and supporting documents.

Lastly, books and registers must be kept in a detailed and precise manner, accurately reflect all operations, and no entry may be falsified, erroneous or fake. Books and registers are defined as all media used for business entries. These include accounts as well as correspondence (paper, e-mail, etc.), computer storage media, paper documents, books, etc. The transactions must be transparent, fully documented and appropriated to accounts that precisely reflect their nature.



An employee must never knowingly input or produce information or documents that are erroneous, misleading or fabricated; similarly, it is not permitted to remove or take outside of the company any confidential information or accounting or legal documents.

2.2.11 We all contribute to the Group's reputation and do our best to preserve it

Each of us can contribute to the image and reputation of the Group in his own way. They must therefore strive to do the Group credit as far as possible, and must certainly do it no harm. Particular attention must be paid to the use of social media; if and when communicating through such networks, employees

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must respect the principles set forth in the Code of Ethics, particularly those relating to confidentiality and respect for our various stakeholders (employees, clients, suppliers, competitors, etc.).

We must protect confidential information. We must not make public disclosures about GEODIS' business activities if we are not authorised to do so. If we are authorised to disclose information we must ensure it is true, accurate, consistent and not misleading.

We must not engage with the media without clearance from GEODIS' Communication department.

3 ETHICS AND COMPLIANCE RESPONSIBILITIES AND ORGANISATION

3.1 Group Ethics and Compliance organization

To support the Code of Ethics, ensure that it is deployed, and answer any questions raised while doing business, GEODIS has set up a Compliance Department in order to look after subjects relating to ethics and compliance. This organisation is placed directly under the authority of the GEODIS Chief Executive Officer.

 Its main purposes are to:

- Develop the Ethics and compliance programmes, help to deploy best practices and set standards for business ethics;
- Organise awareness and training campaigns within the Group and develop the tools needed to create a culture of accountability;
- Represent the Group internationally with clients, business partners and professional associations as well as governmental and non-governmental organisations;
- Give advice on all ethics and compliance issues;
- Manage the ethics alert facility.

The GEODIS Risk Committee monitors the implementation of the compliance and ethics programmes as well as incidents and questions forwarded by the Compliance Department or through the Group Ethics Alert System. This Committee meets six times a year – or more often if necessary – under the chairmanship of the GEODIS Chief Executive Officer. It involves various members of the GEODIS Management Board.

3.2 Managerial responsibilities

Managers are expected to exemplify the highest standards of ethical and responsible business conduct and to encourage discussion of the ethical and legal implications of business decisions. They have a responsibility to create and sustain a work environment in which employees, consultants, contract workers and subcontractors know the ethical and legal behaviour expected of them.

This responsibility includes ensuring that the GEODIS Code of Ethics is communicated to and understood by all employees and other contacts, notably via training actions or venues for dialogue on the application of the Code's principles in our daily activities.

They should take appropriate steps to ensure that GEODIS clients, subcontractors, suppliers and other business partners conduct their business ethically and in conformity with the laws, so as not to damage GEODIS' reputation. To this end, the "Know Your Business Partner" third party due diligence Policy provides all of the necessary information and rules that must be followed in order to prevent unethical practices risks.

3.3 Ethics responsibilities of all employees

All employees are required to read, understand and comply with this Code of Ethics and, where appropriate, to recall its rules and principles within the framework of, and in, their place of work.

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All employees are required to accept the ethics training they are offered in order to ensure they understand and uphold the principles of the Code.

4 HOW TO EXPRESS A CONCERN RELATIVE TO THE PRINCIPLES OF THE GEODIS CODE OF ETHICS

The right answer to an ethical question is not always easy to find, and the best way is to discuss it openly before acting. As a result, all employees are encouraged to communicate openly and to express any questions or concerns. To do so, they can contact their line manager, their human resources manager or their personnel representatives, whether in their entity, in the Region /Line of Business or on the level of expert functions at the Head Office. In agreement with Group Management, some entities may have set up a local reporting system in order to meet specific legal obligations within their country.

If the employee's concerns cannot be dealt with through the above-mentioned reporting channels, a complementary and secure **Group Ethics Alert System** is available in order to enable the employee to report, in his own language, ethical concerns to the GEODIS Ethics Department:

- A website: <https://alert.geodis.com>
- A local phone number available 24 hours a day, 7 days a week in the country of the phone call: the web page <https://www.geodis.com/alertphone> provides, for each country, the phone number to call.
- An e-mail address: ethics@geodis.com.
- By postal mail: GEODIS – Direction de l'Éthique – 26 Quai Charles Pasqua – F-92309 Levallois-Perret cedex – France.

This system may also be used by GEODIS subcontractors, suppliers or partners.

The Group Ethics Alert System is not intended to receive and deal with an emergency that would constitute a significant and immediate threat to human health, safety or life, or that could cause extensive and irreparable material damage. In such cases, priority must be given to contacting the local authorities or emergency numbers (Police, EMS, emergency services, fire brigade, etc.) available within the country.



Although the use of the various channels or of the Group Ethics Alert System is free and voluntary, it must nevertheless adhere to rules in order to respect and protect everyone concerned by the report and thus guarantee their use in complete confidence:

- The personal data included in the report must be protected in accordance with the national laws and the GEODIS Data Protection Principles.
- Confidentiality is essential in all stages of the handling process.
- The choice of anonymity when submitting a report must be strictly respected.
- The persons concerned by the report will be informed of the nature of the allegations and will remain protected by a principle of presumption of innocence.
- The report is made in good faith and in a disinterested manner.
- The report will be investigated in an independent, fair and unbiased manner.
- No retaliation will be directed against an employee for reporting or participating in the handling of a report.
- The report's documentation is managed and maintained strictly and in accordance with the law.

For information purposes, the various principles for the use of reporting channels as well as the Group Ethics Alert System are described in greater detail in the Speak Up Policy.

5 DISCIPLINARY MEASURES IN THE EVENT OF INFRACTIONS

The standard disciplinary measures set forth in the Internal Rules may be applied in the event of a violation of this Code of Ethics and/or the internal notes or "policies" adopted by the Group management in regards of its practical implementation. This Code of Ethics form part of the internal rules of each entity within the GEODIS Group.

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GROUP COMPLIANCE DEPARTMENT

6 REMINDERS AND REFERENCE DOCUMENTATION

6.1 Reminders

- The GEODIS Code of ethics applies to all the persons exercising their functions within GEODIS Group (“GEODIS” means GEODIS SA as well as all subsidiaries and legal entities that are majority controlled or owned, directly or indirectly, by GEODIS SA throughout the world), which means:
 - All corporate board members, directors, officers and managers of a GEODIS’ legal entity;
 - All employees, irrespective of the form of their employment contract and its duration;
 - As well as temporary and interim workers, trainees as well as employees of GEODIS suppliers and service providers working or intervening on behalf of GEODIS.
- The GEODIS Code of Ethics may also be shared outside the Group as necessary, with clients, suppliers and shareholders. For instance, our commitment to Ethics and Compliance can be distributed to clients, suppliers and shareholders.
- The GEODIS Code of Ethics and the internal notes or “policies” adopted by the Group management in regards of its practical implementation concern all employees of GEODIS and its subsidiaries worldwide, as well as all officers and directors of GEODIS and its subsidiaries.
- The Code is available in several languages; the French version of this code is the reference document.
- The Company recognizes that the Code of Ethics is not exhaustive and that it may change from time to time. The Company reserves the right to change, modify or correct the Code of Ethics.
- The GEODIS Code of Ethics aims to provide a framework for all existing policies in the workplace, but does not replace them, so long as the policies comply with the Code.
- The Group management reserves the right to adopt one or several internal notes or “policies” for the purpose of the practical implementation of the principles set forth in the Code of ethics. These internal notes do not form part of the internal rules, as this Code of ethics does, as long as they do not include general and permanent measures in the matters failing within the scope of the internal rules and as long as they do not define or illustrate the different kind of prohibited behaviours which may characterized acts of bribery or influence peddling.
- The Group departments mentioned in the Code can be contacted at the following addresses:
 - Ethics Department: ethics@geodis.com
 - Compliance Department: compliance@geodis.com
 - Communications Department: dircom@geodis.com

6.2 Information regarding policies and procedures currently in place at GEODIS

In line with the above and for information purposes, it is recalled that the following internal notes or “policies” have already been adopted by the Group management. On specific issues, they state the practical measures for the implementation of the Code of ethics:

- Fair Competition Policy
- Anti-bribery and corruption and influence peddling Policy
- Know Your Business Partner Policy (together with GEODIS Supplier Code of Conduct and the Due diligence questionnaires)
- GEODIS export control guidance
- Gifts and invitations policy
- Speak Up policy
- GEODIS Data Protection Principles

The above documents are available on the Intranet.

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