

One CEVA Code

The CEVA Logistics Code of Conduct



Letter from the CEO

Dear Colleagues,

People make the difference! Our conviction is to protect and foster every day a CEVA that we want our beloved ones to be proud working for.

Each of us contributes every day to exceed the demand of our customers. Through constant innovation, passion, and ambition we find solutions for today and tomorrow's challenges in supply chain. Together we bring connections to the world and grow CEVA to be the leader in logistics!

Being the leader gives us an elevated responsibility in how we shape the supply chain of tomorrow. Leading requires us to unite around our strengths, embrace collaboration, and earn as a team every day the trust of our customers.

With our growth we face difficult situations, and we need the humility to pause, reflect on the impact of our decisions, and exercise good ethical judgment.

As One Team, we have built this Code of Conduct together to serve as our moral compass. To lead by these principles is to discuss this Code with our teams, listen to those around us, and make choices that build on the better ways of this Code. This is the legacy of bold and ambitious people!

We connect and lead with Integrity, as One Team, One CEVA.

Mathieu



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Exemplary Leadership

Leading One Team

When CEVA is entrusting Leaders and Managers the responsibility for colleagues, they have an elevated responsibility to lead with integrity and be role models. Our teams expect us to protect and shape our culture. Through our example we impact the way we work, respect, and listen to one another. Every day we live up to this expectation and aim for better ways.

Role-modeling: Excellence, Exemplarity, Imagination, Boldness

We make it clear. We grow the confidence of our team members by being clear on responsibilities and expectations. We communicate openly about what matters, and we make sure our teams understand the One CEVA Code and our Rules & Principles applicable to their role. This way we lead our teams to excellence.

We support one another. Leading people to success is about respect and listening. We are there for our team to voice their questions, concerns, and ideas. Speaking up is about protecting One CEVA. We ensure our teams feel comfortable with their duty to speak up; as much about ideas and improvements, as about Ethics & Compliance and this Code.

We earn trust. When we listen, we commit, and we act. Our actions are seen and heard, and they influence those around us. It is a privilege to earn our teams' trust; we are proud that we are the ones they call for help and to share success.

We aim for better ways. At CEVA, we build our success on merit. When we face ethical dilemmas, we have the courage to pause, reflect on the impact of our actions, and ask for help. The standards we set are exemplary, just as our teams.

We lead by example. Every day we inspire our teams to be bold and ambitious. For us, better ways are forged with integrity and the continued excellence in going beyond our customer's expectations. We develop, grow, and nurture our teams to become CEVA's leaders of tomorrow.

We are One CEVA Team on our way to Success!



Workplace Integrity



One Team

Together, we protect a workplace that is honest, fair, and safe. We owe to one another to feel valued, respected, and able to contribute. Harassment, discrimination, and unsafe working conditions have no place at CEVA. This way, together we embrace better ways.

Our responsibility

We respect and care for each other. Being open-minded, kind, and fair, we do not tolerate any offensive, demeaning, or abusive conduct. Violence, threats, verbal abuse, bullying, unwanted sexual advances, intimidation, and other disrespectful behavior are unacceptable. This applies to all interactions with our colleagues.

We succeed as a team.

- We listen to each other. Listening is the best way to learn about our colleagues.
- We believe in cooperation and give everyone a fair chance to contribute.
- We value diversity. Our differences make our team stronger.

We protect our colleagues. Safety is our priority! Every day every one of us, on CEVA's and our business partners' sites, ensures that we work in a safe environment. To do this:

- We understand and follow all of CEVA's health, security and safety standards.
- We watch out for our colleagues and step in when they need help.
- We report all health & safety issues immediately.

We are One Team. Together every day.

Support

[HR support page](#)



Speaking Up

One Team

It is our duty to protect CEVA: when something is not right, we speak up and CEVA will listen and act!

Sometimes it is a genuine mistake, sometimes it is a behavior that is not in line with our values, our Code of Conduct, or the Law. When we speak up, every situation is treated confidentially, and CEVA protects every colleague who speaks up from retaliation. We all deserve to have a culture of organizational justice, where misconduct is addressed fairly, objectively, and timely.

Our responsibility

We Speak Up! Speaking Up is about protecting our values and improving the way we work, the way we serve our customers with excellence. When something can be improved or when a situation does not sit right, it is our duty to voice it, ask for help and advice. You can speak up to whomever you feel most comfortable:

- your line manager
- Human Resources, Legal
- your Ethics & Compliance Officer in your country or Region.

If you prefer, you can also contact our [helpline](#) available 24/7, in multiple languages – in most countries you can make anonymous reports if you want.

CEVA listens, acts, and protects. When you speak up, CEVA's Ethics & Compliance team will investigate each and every matter confidentially and with full objectivity. Investigations are performed by accredited investigators under the supervision of the Ethics & Compliance Function:

- only trained and accredited investigators can investigate and
- only under the supervision of the Ethics & Compliance Function.

For each case, Ethics & Compliance will:

- protect the confidentiality
- establish the facts
- compare the facts to the Law, the Code of Conduct, or CEVA's Ethics & Compliance Rules and Principles
- recommend a fair, objective, and proportionate action.

After each case, Ethics & Compliance will assess the risk for retaliation and ensure CEVA takes necessary and proportionate measures to protect all involved in an investigation from any retaliatory action.

We protect the values that unite us as One CEVA! We speak up!



Conflicts of Interest

One Team

We make all our decisions independently and objectively. Every day we decide what is best for CEVA, our teams, and our business partners. Conflicts of interest can happen when our personal interests compete with our obligation of loyalty as CEVA employees. When we feel our judgment could be biased: we stop and disclose. This way, we continue making the best decisions for CEVA.

Our responsibility

We are open about any situation that influences our ability to make a fair and objective decision. To do this:

We stop and disclose. Disclosing a conflict of interest is about improving the way you make decisions on behalf of CEVA and our customers. When your personal situation influences your decision, it is your duty to get help. By involving an independent expert, you ensure transparency, and get an objective view of the situation: disclose your situation to the Ethics & Compliance officer in your country or region.

CEVA respects and understands. Every situation is different, often it involves people close to you, and most of the time there is an easy solution to protect CEVA's interests and you as well. We respect what is your private life and treat each and every conflict of interest confidentially and objectively. When you disclose a situation that could be a conflict, Ethics & Compliance will:

- have a confidential discussion one-to-one with you and ask questions to better understand the situation
- and if there is a risk for a conflict, find together with you fair, objective, and protective measures.

You will always receive a clearance, so you and your Line Manager can adhere to it.

One CEVA comes first – we stop, disclose, and get independent clearance!

Support

[Conflicts of Interest Rule & Principle](#)



Fair Competition & Antitrust

One Team

A free and competitive market drives all of us to go beyond our customers' expectations.

We aim to be leaders through integrity, merit, continuous improvement, and competing by the rules.

Our responsibility

Compete by the rules.

- Knowing the market makes us better at what we do – we only collect legit business intelligence, and we reject unsolicited competitively sensitive information.
- In each situation, trade association meeting, tender, lead logistics, freight forwarding, brokerage, contract logistics, Mergers & Acquisitions, or meeting friends who may work for competitors, we understand and respect the rules:

- o we do not share competitively sensitive information;
- o we do not ask for confidential intelligence from our competitors;
- o we seek help and obtain guidance before meeting competitors.

Integrity leads decisions.

- We aim for what is best for our customers and we are proud to win their trust through fair competition.
- Pressure, complexity, and tight deadlines can all make us doubt on what is the right decision – this is when we stop, pause, and ask for advice.

We want to be proud of our decisions!

Support

[Competition Law & Antitrust support page](#)

[Trade Associations Policy & Procedures](#)

[CEVA Business Rules](#)



Anti-Bribery

One Team

We are proud to act with integrity and fight corrupt, illegal, and unethical practices. We all live up to our commitment to follow all applicable anti-bribery laws and regulations. Together with our business partners, we strive for a world which is prosperous, secure, and free of corruption. Each and every one of us goes above and beyond to defend our principle of zero tolerance towards bribery.

Our responsibilities

We are exemplary when doing business.

- Modest gifts and reasonable entertainment are part of doing business – we do this transparently, applying good judgment, and respecting our partners as much as the value of Law.
- We keep accurate books and records, question the reasons for any gifts, and discuss it internally.
- As managers and leaders, we set an example, ensure our teams are aware of the rules, and ask for help when we are unsure.

We influence with our service and arguments.

- The way we do business is not shady – our success is built on merit and our business partners know it.
- Bribes and facilitation payment have no place at CEVA. No business goal is worth compromising our integrity!
- If we are faced with a request for an improper payment, we refuse and ask Ethics & Compliance or Legal for help.

Good judgment is teamwork.

- Perception matters: It is not only value; intent, context, location, can change how something looks.
- What may be ok in one place can be influence peddling in another.
- Asking for advice and guidance is the right thing to do.

We are One Team. We only have one Integrity!

Support

[Global Anti-Corruption Policy](#)

[Gifts & Entertainment Policy](#)

[Third Party Compliance Due Diligence Policy](#)

[CEVA Business Rules](#)



Protecting Data & Privacy

One Team

We have an elevated responsibility to protect the data customers, employees, and business partners share with us. Protecting data, confidentiality, and privacy goes beyond adhering to the fullest extent to the law; it is a matter of respect and excellence. Every day we go beyond and above to deliver on that commitment.

Our responsibility

We respect privacy.

- Behind every data there is a human! We know it and we respect it!
- We only collect and process data when:
 - we are authorized to do so; and
 - we have a good reason to do it (for example protecting colleagues, delivering goods, fulfilling our contractual obligations).

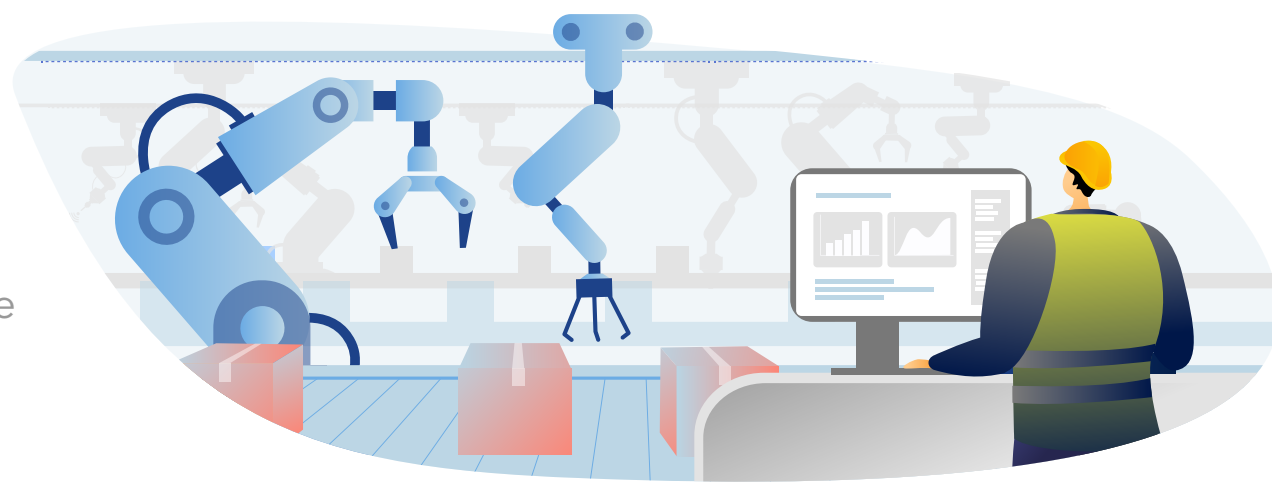
We protect the data of our customers as if it would be ours.

- We value privacy and design all our processes to safeguard the information shared with us.
- By default, our standards ensure that we minimize, anonymize, and only store for as long as necessary.
- We hold all our business partners accountable to the same excellence in protecting the data we have been entrusted with.

We care about the person behind the data.

Support

- [Group Data Protection Policy](#)
- [Privacy Policy](#)
- [Personal Data Breach Reporting](#)
- [CEVA Business Rules](#)



Vigilance & Responsible Logistics

One Team

We are proud to connect people across the world! We transport the most valuable goods and ensure we are responsive in the most demanding supply chains. As a global leader we respect all applicable international trade laws, enforce all product-specific regulations, continuously excel in delivering with our business partners, and favor sustainable alternatives to reduce our impact on the environment.

Our responsibility

We know our customers and suppliers.

- Each service, each shipment, each transaction requires us to know with whom we do business;
- Blending human expertise with advanced technology enables us to conduct our due diligence proportionate to the risk and in line with the expectations of our customers and the regulators.

We care about the goods we handle; sensitive, dangerous, life-saving – all goods receive the necessary attention from origin to destination. It is an honor for us to adhere to the most stringent quality requirements.

We do not compromise.

- Our customers hold us accountable to the highest standards.
- Every business partner, every contractor shares this accountability – together we deliver a supply chain that we can all be proud of.

Responsive & Responsible Logistics – for Better Ways!

Support

[Third Party Compliance Due Diligence Policy](#)

[Customer Compliance Due Diligence](#)

[Global Trade Compliance Policy](#)

[GTC support page](#)

[CEVA Business Rules](#)





This 'One CEVA Code', the Code of Conduct of the CEVA Logistics SA Group (CEVA) was approved on June 14, 2022. It is effective as of July 5, 2022, for all affiliates of CEVA, and it is applicable to all operations and associates of CEVA. This code does not allow any waiver and it replaces all previous Codes of Conduct of CEVA.

Breaches of CEVA's Code of Conduct, as well as our ethics & compliance rules & principles, ethics & compliance policies, or local laws, will result in remedial, corrective or disciplinary actions up to and including termination of employment. It is an obligation for each of us to report actual or suspected incidents of misconduct to the Ethics & Compliance Function as outlined in this Code. CEVA guarantees non-retaliation and confidentiality, to the extent legally possible, for good-faith reports of such breaches.

www.cevalogistics.com

