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Code of conduct

March 2018

Packimpex Code of Conduct

Packimpex recognizes its place in the communities in which it operates and accepts its responsibility to act in a proper and appropriate way in all business matters and to comply with all relevant law.

The Board of Directors and Senior Management are committed to ensuring that the current 'Code of Conduct' is respected at all times and that the company operates in an ethically responsible manner. Furthermore, Management has signed, and is committed to, the [FIDI Anti-Bribery & Corruption Charter](#) (ABC-Charter) and the [FIDI Anti-Trust Charter](#). These Charter are considered integral part of this 'Code of Conduct'.

The company expects all employees to be familiar with the 'Code of Conduct' and the FIDI ABC Charter, and to follow its rules and regulations at all times when representing the company in all business transactions, activities and otherwise acting as an agent of the company and to notify Management of potential or suspected breaches of this Code.

Ethical behavior and representing the company

1. I know the vision, the company values and the above mentioned documents, as well as the yearly goals.
2. I am aware of my responsibilities. My professionalism is essential for the customer's trust in our company. I will conduct myself, at any time, in an ethical, legal and honest way in order to maintain professional relationships with customers, employees, vendors and suppliers.
3. The services offered by our group are based largely on trust. I will fulfill this trust through diligence, proactive communication, expertise and dedication to all parties concerned.
4. I will not risk the customer's trust through improper decisions, careless actions or violations of laws or regulations, whether intentional or unintentional.
5. Teamwork within the company is essential for success. I will conduct myself accordingly and refrain from any form of possible discrimination, intimidation or harassment. Packimpex values equal opportunity regardless of ethnic origin, nationality, sex, sexual orientation, religion, age or disability.
6. I am aware that I represent Packimpex as a whole when I carry out my job.
7. I have the courage to say "No." I will not knowingly allow laws, rules or regulations to be violated. I will warn my colleagues, partners, suppliers, as well as my supervisors, of possible violations.
8. I have read and understood the content of the Packimpex Employee Handbook and its related policies (such as time-log policies, the 'Ausführungsstandards' etc.) relating to the work environment and safety regulations of Packimpex. I accept its content and will abide by its rules.

Anti-Bribery and Corruption

1. I have read and understood the FIDI Anti-Bribery & Corruption Charter and will act accordingly at any time. I accept that this Charter is integral part of this Code of Conduct.
2. I will not accept gifts, payments or other benefits that could compromise my professionalism with regard to the customer, the company or other concerned parties. In particular, I will not accept gifts, payments or other presents from customers, suppliers or vendors with a value above CHF 200. I will immediately report presents above this value to the Business Unit Director.
3. I understand, that Senior Management is committed to free and fair competition and I will not knowingly tolerate or take part in anti-trust or anti-competitive activities, such as for example agreements with potential competitors which prevents, restricts or distorts competition; exchange of sensitive commercial data regarding prices. I understand and will comply with the FIDI Anti-Trust Charter.

Ethic test and escalation procedure

1. I know that when in doubt I can consult my immediate supervisor or the group's 'ethics responsible' person.
2. When in doubt, I can apply the 'ethics test':
 - Is it legal?
 - Do I feel comfortable with it?
 - Is it in keeping with the values and goals of the company?
 - What if everyone did it? Would I/the company want that?
 - Would it be a problem to speak about it with my supervisors?
 - Would I want to read about it in the newspaper?
3. I will inform my superior, the group's 'ethics responsible' or any member of management if I discover or suspect any breach of Packimpex' Code of Conduct. I understand that Packimpex aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Data privacy

Being discreet and ensuring the customer's confidentiality are essential components of our professional ethics. The purpose of Packimpex data [protection policy](#) is to ensure that all Packimpex staff, external partners and subcontractors are clear about the purpose and principles of Data Protection and to ensure guidelines and procedures in place are consistently followed.

Our Data Protection Policy is applicable to all employees of Packimpex as well as any third party company or person performing work for or on behalf of Packimpex.

Policy ownership and review

1. In order to underline its commitment to the application of this policy, the CEO has been defined as the group's 'ethics responsible'.
2. The Code of Conduct is referred to in the employment handbook, which is integral part of any employee's working contract.
3. The content of this policy as well as its application is subject to an annual review by senior management as part of the annual management system review.