



GASTON SCHUL

# Our Code of Conduct.

November 2024



# Our Code of Conduct.

At Gaston Schul, our Code of Conduct is the foundation of how we operate as a company. It guides our interactions with customers, suppliers, and other stakeholders, and sets clear expectations for all employees across all countries and departments. This document outlines how we uphold the **Gaston Schul Company Values** in all our business activities and interactions.

This Code applies to everyone within Gaston Schul, regardless of role, location, or employment agreement. We ask that you integrate these principles into your daily actions and decisions. Each of us bears the personal responsibility to do what's right, ensuring Gaston Schul remains an organisation we can all take pride in.

We expect the parties for whom we work (our customers), with whom we cooperate (our partners) and who work for us (our suppliers) to subscribe to the same or equivalent values and principles and operate in compliance with applicable laws and regulations.

Our Code of Conduct reflects our commitment to operating as a sustainable, ethical, and responsible business. It will be regularly reviewed to maintain its relevance, and all new team members will be introduced to it during on-boarding.

You can find this Code on our company Intranet "Connect" and our website.

## Our Company Values.



### Kindness

Leading with heart and mutual respect.



### Excellence

Striving for superior quality differentiates us.



### Customer Focus

Providing unparalleled service by exceeding expectations.



### Innovation

Creating a better future by becoming the leading edge.



### Integrity

Building trust and long-term partnerships.



# A message from our Executive Team.



In our years at Gaston Schul, we've seen first-hand how our integrity shapes our success. Our Code of Conduct isn't just a rulebook - it's the backbone of our reputation and the key to our future.

Every day, we navigate complex customs regulations and customer needs. This Code is our compass, ensuring we make the right choices consistently, across all our operations and locations.

It reinforces our commitment to innovation, sustainability, and exceptional service. It's how we build trust with customers and partners across borders.

We challenge each of you to not just follow this Code, but champion it. It's how we'll continue to lead in our industry and make a positive impact globally.

Together, let's embody kindness, strive for excellence, focus on our customers, drive innovation, and uphold our integrity in everything we do.

## The Executive Team



# Kindness.

Leading with heart and mutual respect.

We believe in the power of kindness and are committed to cultivating a culture of empathy, compassion, and inclusion. We embrace the diversity of all people and provide an environment where everyone feels welcomed, respected, and supported to thrive.



# How we demonstrate **Kindness:**

## 1. Respectful conduct

Gaston Schul upholds and actively enforces the principle that all employees must treat each other with respect, integrity, and honesty in a socially safe environment. This principle forms the basis of our preventive policy aimed at combating undesirable behaviour. We have zero tolerance for any form of discrimination, intimidation (including sexual harassment), aggression, violence, or bullying in all work situations, both within and outside Gaston Schul.

## 2. Reporting misconduct

It is crucial that employees feel empowered to report any situation that conflicts with these principles of desirable behaviour. We strongly encourage such reporting. Any complaint about undesirable behaviour will be handled with care and treated with strict confidentiality by an external counsellor.

## 3. Whistleblower policy

In accordance with applicable national laws, we have a whistleblower policy that allows employees to report suspected abuse or irregularities. This policy is detailed in the employee's labour regulations handbook.

## 4. Substance abuse policy

We maintain a zero-tolerance policy for the use of alcohol, drugs, and

unauthorised medications in the workplace. Employees are prohibited from being under the influence of these substances during working hours, and are prohibited to carry, sell, or provide others with access to these substances within the workplace.

## 5. Company property

Gaston Schul provides necessary tools (computers, smart phones, etc.) to employees allowing them to effectively fulfil their role. These remain company property and are subject to a separate agreement between the employee and Gaston Schul.

## 6. Preventive measures

Our management actively pursues policies to prevent and combat undesirable behaviour, fostering a culture of mutual respect and professionalism.



# Excellence.

Striving for superior  
quality differentiates us.

Our dedication to know-how and self-improvement fosters excellence. We are driven to deepen our expertise, share knowledge and apply learnings. This empowers us to deliver unparalleled service and value to our customers.

# How we demonstrate Excellence:

## 1. Training and education

Gaston Schul employees are automatically enrolled within a Performance Management System (PMS). The PMS is designed to understand the existing competency, skill, and knowledge level of an employee, with the end goal of creating a tailored training and development plan to achieve existing job role requirements, or to support in reaching enhanced levels for career progression.

## 2. Corporate social responsibility

Gaston Schul has a well thought social responsibility policy with a multi pronged approach. This includes, but is not limited to, the offering of internships for students within secondary vocational education or university, as knowledge growth within our industry is key, as well as donating to respectable charities, that are selected by conducting a company-wide voting scheme.

## 3. Environment and environmental protection

Gaston Schul strives to be as sustainable as possible; this can be seen within the conscious choices we make. Locating to modern, energy-friendly offices, creating paperless processes, limiting travel by utilising digital applications such as Teams, plus active waste separation within the offices, all of which contribute towards environmental protection and a sustainable future.

## 4. Customs and customs related legislation / compliance

Being compliant and adhering to customs rules and legislations are of critical importance and is integral to our full-service offering. Our performance is measured via a series of internal controls and audits, however being compliant not only allows us to retain our AEO license, but it also protects us, our reputation and our customers from fines, penalties, and convictions. Our internal processes, procedures, and organisational structure is expertly designed to avoid risk. Every employee has the obligation to adhere to the rules, processes and procedures set by management and the legislation set by the relevant customs jurisdictions.

## 5. Financial governance

Gaston Schul has implemented standardised policies regarding budgeting, forecasting, and financial reporting to ensure that financial reporting is accurate and compliant with relevant laws and regulations and to maintain consistency and accuracy in financial operations. Robust internal controls are implemented for preventing fraud and ensuring the reliability of financial reporting. Transparent communication with stakeholders, including shareholders, employees, and regulators, is set up. Gaston Schul has set key performance indicators (KPIs) to assess financial performance. This involves analysing financial statements, cash flow, and profitability metrics to inform strategic decisions.

# Customer Focus.

Providing unparalleled service  
by exceeding expectations.

Our customers are at the heart of everything we do. We seek to deeply understand their needs and meet any challenge with thoughtful solutions. We measure our success by their satisfaction.





# How we demonstrate **Customer Focus:**

## 1. Customers at the heart of Gaston Schul

Our customers are at the heart of our organisation and their satisfaction is taken into consideration of everything we do. We make sure that we understand our customers' business processes in depth, allowing us to identify and resolve bottlenecks and pain-points by offering proactive solutions. Our dedicated Customer Teams work closely with customers to understand their unique challenges and industry-specific needs, enabling us to deliver tailored solutions that drive their success.

## 2. Full-Service

Being full-service means that we can assist and equip our customers with all the knowledge, services, and solutions they need for a cost efficient, leading-edge, risk-free operation. We strive to relieve our customers from any boundaries (within the existing legal framework) concerning their logistics and trade flow. Thus, providing them with a partnership they can lean on, and making their movement of goods as hassle-free as possible.

## 3. Customer Teams

To be able to provide unparalleled services to our customers we operate in Customer Teams. Working in this way, is an important aspect of our full-service strategy as this structure provides a centralised, multi-disciplinary offering to our customers, allowing us to meet their needs, regardless of their request. us to deliver tailored solutions that drive their success.



# Innovation.

Creating a better future by becoming the leading edge.

Our culture of innovation is focused on continuous exploration and improvement. We actively invest in developing new solutions, advancing technology, and enhancing how we serve.



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# How we demonstrate **Innovation:**

## 1. Smart solutions

Our commitment to innovation is demonstrated through the development and implementation of smart automated solutions and interfaces. We leverage cutting-edge technology to create efficient, user-friendly customer portals and integrate AI-tooling within our processes to enhance service delivery and operational efficiency. Our innovative solutions are built with cyber security at their core, ensuring robust protection of our systems and data through comprehensive security measures and protocols.

## 2. Customer Team approach

Our collaborative team approach leverages state-of-the-art IT solutions to continuously improve our service offering. We maintain specialised innovation groups focused on process improvement and actively research and adopt emerging technologies that can benefit our customers and operations. These teams work collaboratively across the organisation to ensure our innovations are both ground breaking and secure.

## 3. Future-focused development

We actively invest in technological advancement and digital transformation initiatives. Our culture of innovation encourages creative problem-solving and forward-thinking approaches to customs and logistics challenges. This commitment to innovation ensures we remain at the forefront of industry developments and continue to provide leading-edge solutions for our

customers. As we develop these innovations, we maintain strict protocols around intellectual property - all developments, concepts, inventions, and know-how established by Gaston Schul employees remain the company's intellectual property, enabling us to protect and build upon our innovative solutions.





# Integrity.

Building trust and  
long-term partnerships.

We act with honesty, transparency, and accountability. We honour our commitments and conduct business ethically. Our relationships are built on mutual respect and trust.



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# How we demonstrate **Integrity:**

## 1. Anti-bribery and anti-corruption policies

Gaston Schul maintains an anti-bribery and an anti-corruption policy that complies with national and international laws. This policy must be adhered to by every employee. Gaston Schul will not tolerate any form of corruption and/or bribery and is committed to sound business practice with the right balance between integrity, loyalty, and critical thinking.

## 2. Social Media

Gaston Schul has a policy regarding the use of social media. Our employees are not permitted to share any confidential business-related intelligence and/or damaging information via social media, such as financial, product or customer data, without the employer's permission. The employee must always clearly indicate on social media if he or she is expressing them self in a personal capacity. The content of the employee's profile falls entirely under their own responsibility.

## 3. Employee commitment and business continuity

Gaston Schul values long-term relationships with our employees and invests in their growth and development to build lasting partnerships. While we implement relationship and competition provisions in accordance with applicable national legislation, our primary focus is on creating an engaging work environment that encourages employee loyalty and professional growth. When employees do choose to move on, we manage transitions professionally and in line with current legal frameworks to protect our business relationships and intellectual property.

## 4. Child labour, forced labour, and sustainability

Gaston Schul recognises the importance of fostering sustainable and responsible corporate behaviour for a just transition towards a sustainable economy. Under the influence of global and European sustainability legislation, Gaston Schul takes the necessary due diligence steps to monitor their supply chain partners in a bid to eliminate negative impacts not only on human rights, including modern slavery, forced and child labour, but also the environment.

## 5. Money laundering

Gaston Schul has a series of financial audits and checks in place to prevent being affected by doubtful transactions and/or transactions that may be affected by money laundering. Any employee found to be planning, aiding, or involved in money laundering in any capacity will be held accountable and the relevant measures regarding employment enforced.

## 6. Sanctions legislation and export restrictions

Gaston Schul has internal procedures in place to prevent violations of sanction legislation and/or export restrictions. By monitoring the legislation, conducting training, informing our employees, and implementing system blocks, supports the prevention of unauthorised transactions being processed. It's imperative employees listen to legislative updates provided.

# How we demonstrate **Integrity:**

## 7. Side-activities; additional (part-time) job and other (political) side activities

In accordance with applicable (labour) regulations, performing secondary activities is permitted for Gaston Schul employees provided that:

1. The health and safety of the employee is not at stake.
2. The protection of confidential information is not jeopardised.
3. No conflicts of interest arise.

If the above conditions are not met, authorisation to proceed is rejected, unless written confirmation from Gaston Schul is provided.

