
CODE OF CONDUCT (Updated 26/06/2024)

UNDERTAKINGS AND RESPONSABILITIES

- Corruption, anti-competitive practices and international sanctions
- Human rights
- Health and security of individuals
- Environment
- Personal data protection and information systems security
- Diversity

IMPLEMENTATION OF THE CODE OF CONDUCT

- Implementation
- Stay informed and sound the alert

The Code of Conduct may certainly be complemented by policies, procedures and other means of information or professional development (videos, etc.)

FOUR FUNDAMENTAL PILARS – UNDERTAKINGS AND LVO GROUP VALUES

The ethical demeanour of the LVO Group rests with the values and principles embodied and applied by the whole of its managing directors, commercial partners and collaborators worldwide. The present Code of Conduct details, for the whole of the Group's entities, employees and partners, the fundamentals of this demeanour and the expected behaviour in their daily operations. This Code of Conduct is fully aligned with the social and environmental policies of LVO Group, as set forth in its CSR report.

Act with integrity
Promote human rights
Federate and protect our teams
Be attentive to major environmental issues



MESSAGE FROM LVO GROUP'S CEO

The LVO Group continues its ongoing development, while adapting itself to a world in constant evolution. This success relies on the full-fledged commitment of the women and men who have contributed to the growth of our activities, while defending our values, our know-how and while embodying a common, shared, professional ethic.

The LVO Group is firmly opposed to any form of corruption, influence trafficking and anti-competitive practices. It is committed to ensuring financial transparency, to abide by all economic sanctions programs , and to protect all personal data. It adopts measures to prevent environmental infringements, infringements of human rights and fundamental liberties, as well as the encroachment of the health and security of individuals. Finally, it combats all forms of discrimination and harassment.

In these times of transparency and responsibility, fast and easy declarations do not suffice. By our individual actions, we are all Group ambassadors and protectors of its reputation. All of our entities' managing directors join me in asking you to always act with integrity, while respecting the relevant laws and our Code of Conduct. No conduct contrary to our Code will be tolerated : our collective responsibility and the long lasting existence of our Group rely on this.

THE LVO GROUP AND ITS ACTIVITIES

The LVO Group carries on its activities as transport commissioners worldwide, essentially through its vast network of offices and warehouses.

The Group is proud to accompany, professionally train and ensure the progression of its teams throughout their careers. This is at the core of the Group's strength.

ADHESION TO INTERNATIONAL STANDARDS

The LVO Group Code of Conduct is in compliance with international standards regarding ESG compliance. The Group undertakes to integrate in its commercial strategy, its culture and its daily operations, the 10 principles of the World Pact regarding human rights, labour norms, the environment and the battle against corruption.



RESPECT FOR OVERALL CONFORMITY

It is the responsibility of each collaborator, employee, representative and commercial partner of the Group's entities, to adhere to this Code. LVO Group will not tolerate any infringement of this Code and encourages all concerned to bring to our attention any contrary behaviour or actions (See the "Alert" section). Those responsible for any infringement will be subject to disciplinary sanctions or legal prosecution according to the relevant law.

UNDERTAKINGS AND RESPONSABILITIES

Fight against corruption

Essential principles

The LVO Group firmly condemns all forms of corruption and influence peddling. Corruption represents a major obstacle to durable growth and to the socio-economic development of all countries. All individuals acting on behalf of the Group must refrain from proposing any type of advantage to a person (particularly to public officials) in exchange for the accomplishment or the non-accomplishment of an act under their authority, or in order to obtain a decision favourable to any entity of the Group.

EXAMPLE : The offering of a gift to a commercial partner/professional collaborator

A good client, with whom I have had a good working relationship for many years, is on the eve of retirement. I would like to offer him a gift or invite him to the restaurant. Unfortunately, this coincides with the finalisation of a call to tender to which I have submitted a bid.

Conduct to adopt : Under certain circumstances, it is possible to offer gifts or invite clients/prospective clients to events in order to maintain good commercial relations. However, these gifts must be declared, authorised and registered. Offering (or receiving) a gift must always remain a reasonable and uninterested gesture, with no intention to influence its recipient. In this case, by reason of the imminence of the final decision concerning the call to tender, the gesture is not appropriate and would not be in compliance with the Group's policy.



FIGHT AGAINST ANTITRUST PRACTICES

Essential principles

A healthy competitive environment enables the offering of best services to our clients. The LVO Group does not partake in any practice tending to falsify, block, suppress or abusively restrain open and free competitiveness. Such practices notably include price fixing or market sharing arrangements and calls to tender.

EXAMPLE : Market sharing arrangements

My company has meetings with other entities of our business sector once a month. During one of these meetings, the participants engage in collusion talks regarding an important call for tenders, talks aiming at fixing bids tendered so that all participants be selected to share a specific part of the of the targeted market.

Conduct to adopt : Collaboration with other entities of the same business sector can undoubtedly be useful in solving problems common to the sector, such as regulations , geopolitical issues, merchandise security, etc. However, if matters such as price fixing, market sharing , or calls for tender are brought up, it is important to immediately leave the meeting and ensure that your departure is duly recorded. You must then bring this incident to your hierarchy's attention or launch an alert through the Group's alert mechanism.

COMPLIANCE TO INTERNATIONAL SANCTIONS

Essential principles

The LVO Group complies to all sanctions emanating from the UN Security Council, the European Union and the United States of America, whether such restrictive measures are taken against a State, an individual or an organisation.

Any person acting on behalf of the Group or any entity thereof must abstain from participating in operations which could contravene an embargo, sectorial sanctions or the freezing of assets.

EXAMPLE : Request to export goods with no of insufficient details concerning the nature of the merchandise.

A client wishes to export merchandise to country X. This client is trustworthy and well known, but does not wish to indicate the precise nature of the goods. This way of doing business is not in conformity with the Group's Code and the nature of our business.

Conduct to adopt : Certain sanctions programs prohibit or require a preliminary authorisation for operations involving a country or a specified economic sector. When in doubt, it is necessary to require as much information as possible regarding the merchandise



and to verify if the country of destination X is the object of any particular sanctions, and to contact, if need be, the sanctions conformity delegate within your work perimeter.

PROTECTION OF FREEDOM OF EXPRESSION AND ASSOCIATION

Essential principles

The LVO Group promotes the right to freedom of expression, association and collective representation, and undertakes to guarantee an open dialogue under all circumstances. All individuals acting on behalf of the Group must refrain from all forms of pressure, exaction or behaviour aimed at altering or impeding the free association and expression of employees.

EXAMPLE : Employee demands

I manage a Group entity in a country where labour Unions are not protected by law. Certain employees wish to form a Union in order to express their labour demands.

Conduct to adopt : The LVO Group undertakes to facilitate free expression and guarantees against discrimination all employees of any entity in the Group involved in any type of employee representation organisation. Within the scope of local laws, the employees must be received and their demands taken into consideration. Please contact our Human Resources department in order to put in place the mechanisms and procedures allowing for the gathering of employee demands and guaranteeing free expression.

FIGHT AGAINST FORCED LABOUR AND TRAFFIC OF HUMAN BEINGS

Essential principles :

The LVO Group firmly opposes all forms of modern slavery and the traffic of human beings. All individuals acting on behalf of the Group must refrain from participating or contributing, directly or indirectly, to any situation involving forced labour. Forced labour is defined as any work carried out against the will and under the constraint of any form of threat, including violence, intimidation, debt manipulation, withholding of salary or identity documents, and the menace of denunciation to immigration authorities. Traffic of human beings often involves the exploitation of individuals by way of forced labour, often involving the transport of these individuals within a country or extra-territorially.

EXAMPLE : Dangerous working conditions involving a sub-contractor

During a visit to a worksite, I realise that some employees hired by a sub-contractor have been sleeping on the site parking lot and are working without the proper equipment. Certain workers accuse the employer of withholding their salaries in order to force them to



continue working under these dangerous conditions, thereby preventing them from leaving their job.

Conduct to adopt : If this situation is confirmed, it is imperative to immediately inform your hierarchic superior or your RSE representative, or to bring it to our attention via our professional alert mechanism. Verifications will then be carried out with the subcontractor and corrective actions should quickly be enacted.

FIGHT AGAINST CHILD LABOUR

Essential principles :

In conformity with ILO (International Labour Organisation), the LVO Group prohibits the use , directly or indirectly, of child labour. Furthermore, in addition to complying with the local legislation regarding the minimum age required to access employment, the Group prohibits the employment of all children under the age of 15 for work of any nature, as well as the employment of all children under the age of 18 for any type of work deemed “dangerous”.

EXAMPLE: Young looking individuals hired by a sub-contractor

In the country where my entity is established, employment of children under 15 is not prohibited. During a visit to a worksite operated by a sub-contractor, I notice that certain employees appear to be quite young.

Conduct to adopt : If you are a witness to the use of child labour, or if you suspect such a practice by one of your suppliers or sub-contractors, you must bring this situation to your hierarchic superior or your RSE representative, or utilise our professional alert mechanism. In jurisdictions where the legislation or local practices leave an opening to suspected risks of encroachment, the recruiting and the use of sub-contractors must be the object of increased scrutiny. You must verify all employee identity documents and demand the same rigor of all your commercial partners.

RIGHTS OF LOCAL COMMUNITIES AND NEIGHBOURING POPULATIONS

Essential principles :

With regard to local regulations and international standards, the LVO Group undertakes to respect and promote the rights of local communities, and neighbouring populations capable of being impacted by its activities.

EXAMPLE : Accusations of pollution by neighbouring populations

The entity where I work is next to an urban area. The local residents complain about the presence of discarded palettes and dangerous products, close to water sources and roads, thereby accusing the entity of being the responsible perpetrator.

Conduct to adopt : It must first be determined if the indicated pollution results from the inappropriate behaviour of an employee or commercial partner of the entity, or from the non-compliance of internal environmental management processes. If you witness or suspect non-complying behaviour within the entity, you must bring it to the attention of your hierarchic superior or your RSE environmental representative, or utilise our professional alert mechanism. In jurisdictions where solutions for the proper management of waste are inexistent or weak, it is imperative to put in place adapted solutions to prevent, correct or compensate the risks of pollution.

ENACTMENT OF OUR CODE OF CONDUCT

Mechanism for the enactment of the Code of Conduct :

The Group will not tolerate any infringement of its Code of Conduct and undertakes to take all necessary measures to prevent and sanction all contrary behaviour, established through the appropriate contradictory procedures. Any individual contravening the Code exposes himself to disciplinary sanctions, according to the procedures provided by the internal regulations, or to legal prosecution under the relevant laws.

Compliance to the undertakings of the LVO Group is based on an efficient and coherent system, ensured by various bodies :

- the Surveillance Council
- the General Directorate/ CODIR
- the Ethics Committee – CSR Report and anti-corruption
- the RSE Department and surety
- the Human Resources Directorate
- the Information Systems Directorate
- the Finance Directorate

These bodies ensure the correct understanding and the compliance to the Code of Conduct. Their members are subject to the obligation of confidentiality and have the authority, the competence and the means necessary to carry out their mission.

Functional organisation :

The enactment of the Code of Conduct is structured as follows :

- CSR report : fixes the global undertakings of the Group in favour of a durable and inclusive development.
- Code of Conduct : details the principles, the regulations regarding conduct and the behaviour to be adopted.



- Policies and regulations regarding conduct : covers the conformity areas, human resources, the protection of personal data, etc.

SENSITIZATION AND PROFESSIONAL TRAINING

The LVO Group will deploy as of 2024, mechanisms of sensitization and professional training to ensure that all its employees, collaborators and commercial partners clearly understand the Code of Conduct and can thereby comply in their daily activities. Employees specifically designated as at risk workers will be entitled to additional complementary professional training.

PROFESSIONAL ALERT MECHANISM

The professional alert mechanism completes the classic modes of information feedback, such as the typical hierarchic way. Accessible via the mail address alert@leonvincent.fr, it enables the signalling of a presumed infringement to the Code of Conduct which you are personally aware of. The Group ensures confidential follow-up of the signalling and protection for the signaller(s) of good faith against any form of reprisal. However, any type of abuse of this mechanism can expose the signaller to disciplinary sanctions as well as legal prosecution.