



# GLS Group Supplier Code of Conduct

## General Principles

GLS believes that adherence to national laws, country-specific regulations, prohibitions and other provisions is a matter of course. These principles are described in detail in the GLS Code of Business Standards.

As a subsidiary of Royal Mail Group we are a signatory of the United Nations Global Compact. This internationally applicable ruleset for human and workers' rights, environmental standards and the fight against corruption constitutes the basis for our Supplier Code of Conduct.

We expect our suppliers to respect the standards laid out in this Supplier Code of Conduct, implement them using appropriate measures and adhere to them in their business activities.

## Human Rights

Our suppliers strictly respect the fundamental and internationally recognized human rights and adhere to them without exception.

## Child Labour

Our suppliers prohibit any kind of child labour within their companies and adhere to the United Nations' code for children and human rights.

If no minimum working age has been defined in a country, workers may not be younger than 15 years of age.

## Forced Labour

Our suppliers strictly prohibit forced labour in any form such as slave, penal, or any other form of forced labour. They ensure that their employees are compensated in accordance with applicable laws and regulations and that no employee is unduly restricted in his or her freedom.

## Compensation & Working Hours

Our suppliers must adhere to all relevant local laws and regulations with regards to working hours, overtime, compensation and social benefits. At minimum, the legally mandated minimum wage has to be paid. Deductions as part of disciplinary measures are impermissible without a corresponding legal basis.

## Freedom of Assembly / Collective Bargaining

GLS respects the right to collective bargaining and freedom of assembly and expects its suppliers to act accordingly.

## Health & Safety

Our suppliers strictly adhere to relevant local workplace safety and health laws. They preclude accidents and occupational diseases through a suitable workplace safety management system.

### Diversity

We expect our suppliers to promote fairness in the workplace and prohibit any form of discrimination with regards to gender, ethnicity, religion, age, disability, sexual orientation or national background. We furthermore expect our suppliers to treat their employees with respect and dignity in order to create a workplace environment which is free from bullying, harassment and intimidation.

### Data Protection

Our suppliers adhere to all applicable laws and regulations regarding data protection and information security, especially with regard to the personal data of customers, consignees and employees. They follow these standards in particular when processing, collecting or otherwise using personal data and ensure that such data is protected from unauthorized access, modification or corruption at any time.

### Intellectual Property

Our suppliers are committed to observing all applicable laws and regulations with regard to copyright law and respect the intellectual property of others. This specifically includes the GLS brand, whose use without prior authorization by GLS is strictly prohibited. Where the GLS brand is used with prior approval, its design may not be altered (e.g. with respect to form, colour or other similar aspects).

### Environment

Our suppliers adhere to all applicable environmental laws, regulations and other provisions. They are mindful when using natural resources and promote an environmentally aware conduct of their employees through self-defined climate goals.

### Anti-Bribery & Corruption

GLS follows a strict zero-tolerance policy with regard to bribery and corruption.

In a similar manner, our suppliers strictly adhere to all applicable national as well as international laws and standards which are aimed at preventing bribery and corruption. They will under no circumstances offer or promise something of value to third parties in order to influence them inappropriately and thus achieve an unfair advantage.

### Sanctions

Our suppliers comply with all applicable trade and import regulations, including trade embargoes, financial sanctions and any other sanctions which may apply to their business activities.

### Money Laundering

Our suppliers take appropriate action in order to combat money laundering in all its forms.

### Competition Law

Our suppliers promote fair competition and adhere to applicable competition and anti-trust laws. They will under no circumstances enter or participate in agreements with competitors which are in breach of competition law or abuse their dominant market position in order to unduly stifle competition.

### Conflicts of Interest

Any actual or potential conflict of interest in relation to the supplier's business dealings with GLS must be disclosed.

Conflicts of interest arise when an individual has a private or personal interest which could unduly influence their business decisions.

### Invitations & Gifts

Our suppliers do not abuse gifts and invitations. In particular, they do not use them to improperly influence another party's business decisions. When gifts and/or invitations are granted to GLS employees or persons closely related to them, they are always appropriate with respect to the type of the gift/invitation and its value.

### Public Officials

Our business partners do not tolerate any form of inappropriate or unlawful tangible and intangible benefits to public officials, irrespective of whether these are made directly or indirectly through third parties.

### Supply Chain

Our suppliers take appropriate measures to ensure that the standards set out in this Supplier Code of Conduct are also met by their own supply chain.

In particular, our suppliers do not tolerate any form of corruption and/or bribery in their supply chain and only conduct business with partners who themselves adhere to all applicable laws and regulations with regards to working hours, overtime, compensation and social benefits.

### Compliance with this Code

GLS reserves the right to review and, if deemed necessary, to terminate contracts with the supplier should a serious violation or continuous non-compliance with this Supplier Code of Conduct occur. This also applies if the supplier fails to implement mutually agreed corrective measures within a defined timeframe.

### Whistleblowers

GLS has established a whistleblowing/Ombudsmann-System in order to enable employees, business partners and third parties to raise concerns in complete confidence.

If you want to report a concern using our Whistleblowing hotline, you can contact the GLS Ombudsman:

Herr Rechtsanwalt Dr. Rainer Buchert  
Bleidenstr. 1  
D-60311 Frankfurt am Main  
Tel.: +49 69 710 33 330 or +49 6105-921355  
Fax: +49 69 710 34 444  
E-Mail: [kanzlei@dr-buchert.de](mailto:kanzlei@dr-buchert.de)

We expect our suppliers to not retaliate against anyone reporting their concerns or violations of this Supplier Code of Conduct in good faith.

Version 1, Status: July 2018

[gls-group.eu](http://gls-group.eu)