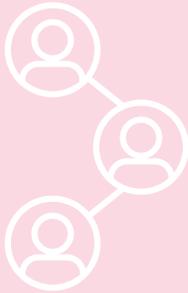




Compliance Compact



GLS.

What is Compliance?

Compliance is the adherence to all relevant laws and internal regulations.

Each GLS employee is responsible for ensuring that within their area of responsibility all applicable laws and regulations are complied with.

1. Acting responsibly

If you make a decision on behalf of GLS, ask yourself the following questions:

- Do I have doubts about the legality of the proposed action?
- Does it shed a bad light on me or GLS?
- Could I face problems defending my decisions in public?
- Are colleagues or clients negatively affected by my decision?
- Is there a better alternative approach?

If you can answer each of these questions with "No", you can generally assume that you are acting in conformity with the Compliance requirements of GLS.

2. Getting Help and Reporting Concerns

Do you have any questions or doubts regarding appropriate behaviour? Ask us! We are also available if you notice a possible Compliance violation. You can report your concerns through our different reporting channels such as:

Helpline

Your Compliance Manager:
Dawnette Coltrin

Tel.: (800) 322-5555 x15310

Email: compliance@glus-us.com

EQS Integrity Line

<https://glus.integrityline.app/>



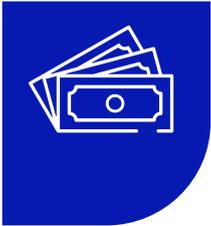
In addition, you may report to the designated external authority as stated on GLS official website.

3. Core principles of the GLS Compliance Program



We are open to free and honest competition and strictly adhere to the rules stipulated in Competition law.

- Do not exchange any sensitive or confidential data with competitors.
- Never reach an agreement with a competitor without first obtaining legal advice.
- Never ask customers or suppliers for confidential information about competitors.
- Seek advice from your Compliance Manager before taking part in benchmarking activities.
- Attendance at industry meetings, at lobbying groups or at any other platform where competitors will also be present must always be approved by the management in advance. Consult your Compliance Manager on the correct behavior at such meetings.



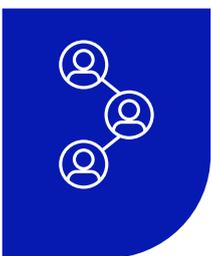
We follow a strict zero-tolerance policy regarding Bribery and Corruption.

- Never extend personal favors in order to induce an improper conduct.
- Never accept a personal favor that is used to induce improper conduct.
- Stick to the defined limits on gifts and hospitality as well as all approval procedures.
- Promptly make any necessary entries in the gifts and hospitality registry.
- Observe the strict regulations governing cooperation with public officials.
- Note that even so-called "facilitation payments" are considered Corruption.



We handle potential conflicts of interest transparently to avoid any semblance of impropriety.

- Conflicts of interest arise when an employee's private interests conflict with GLS' business interests. Typical examples include personal workplace relationships (e.g., hiring or supervising a closely related person) or awarding contracts to business partners in which a decision maker or an associated person has financial interests (e.g., awarding a contract to a company in which the decision maker has a majority shareholding).
- If you become aware of a potential conflict of interest, immediately disclose it to your line manager.
- Your line manager and your Compliance Manager will work with you to resolve the conflict situation and ensure an unbiased decision.



We do not tolerate Bribery and Modern Slavery practices in our supply chain. We rigorously tackle non-Compliance.

- Ensure careful selection of all business partners working on behalf of GLS.
- Apply the Business Partner Approval Process with due care and chose business partners in line with the GLS Compliance standards.
- During the course of the business relationship, monitor business partners so that red flags indicating Modern Slavery risks are recognized and acted on.
- Take red flags seriously and report them immediately.



4. Always remember

If you are unsure about how to behave in a specific situation, talk to your line manager or your Compliance Manager.

If you believe that something already has gone wrong, keep calm and contact your Compliance Manager. He/She will help you limit possible damage or even prevent it.

Taking notice of this document does not replace the reading of Compliance Policies.

