Business Ethics: Code of Conduct
Flying Tiger Copenhagen
Business Ethics: Code of Conduct

Introduction

Acting responsibly and with integrity is deeply engrained in the Flying Tiger Copenhagen organisation and identity. We believe a responsible behaviour in all aspects is key for being successful as a business. This belief has implications for how we source our products, treat our employees and run our business.

Corruption obstructs equal treatment of people and equal access to public goods. It is one of the most severe obstacles to the rule of law and sustainable economic growth and social development. We have a zero-tolerance policy on bribery and corruption and we are committed to conduct our business in an honest and ethical manner in all our business dealings and relationships wherever we operate.

This Code of Conduct communicates our policy commitment and helps guide us and those working for us in living it by explaining the principles and the required actions.

The Code of Conduct applies to all individuals at all levels working at Flying Tiger Copenhagen. It also applies to third party and intermediaries and other persons acting on behalf of us or any of our partners or their employees.

All individuals are expected to read, understand and comply with the Code of Conduct. Individuals with managerial responsibilities are required to ensure that the people they are responsible for understand and comply with the Code.

Please be aware that the Code does not cover every situation that can arise and it cannot substitute sound judgement and common sense. If you are in doubt about any aspect of the Code or find yourself in an ethical dilemma, always seek guidance from your manager, manager’s manager or the Sustainability & Compliance department at Zebra.
Bribery, corruption and extortion

What is bribery?

A bribe happens when a financial or other advantage is given, promised, offered, accepted, requested or received with the attempt to affect a person’s actions or decisions to gain or retain a business advantage.

This means that a bribe is not just cash in an envelope, it also includes an advantage or anything of value such as gift cards, home repairs, tickets to a theatre or a sporting event, a no-bid job, a summer job for a teenage family member, favourable contracts etc.

Facilitation payments or ‘grease payments’ are also considered a bribe. Typically, they constitute small unofficial payments made to facilitate or expedite a routine government action by a government official. This can be obtaining an ordinary licence or business permit, processing government papers, such as visas, providing telephone, or loading or unloading of cargo.
What is our position?

At Flying Tiger Copenhagen, we do not tolerate any form of bribery whether directly or indirectly via third-parties. This prohibition covers interactions with public officials and individuals in the private sector and all types of facilitation payments. And it covers all from soliciting, arranging or accepting bribes or any advantage intended for the employee’s benefit or that of the employee’s family, friends, associates or acquaintances.

Facilitation payments are only permissible in exigent cases when the health, security or safety of an employee is at risk. In this case, the incident must always be reported to CSR & Compliance.

What does this mean to you?

You must never directly or indirectly promise, give or receive bribes and never engage in any improper payments, including facilitation payments. Also, even though such payments are customary in the market where you operate. If a bribe is offered or requested, you must always refuse by referring to this Code of Conduct and report the incident immediately to your manager.

Flying Tiger Copenhagen can be held responsible for acts carried out on our behalf, e.g. via agents. This means that you must always clarify our position on bribery and corruption to business partners or others acting on our behalf.
Gifts and hospitalities (meals and entertainment)

What is meant by gifts and hospitalities?

In most countries, gifts, hospitalities, meals and entertainment play an important role in business etiquette and customs to build business relationships. At Flying Tiger Copenhagen, we value close relationships with our business partners and it is part of our business culture to be hospitable.

What is our position?

Gifts, entertainment and hospitality are acceptable if they are reasonable, proportionate and made in good faith. However, they must not be made in a way to improperly influence or reasonably be perceived to improperly influence, the outcome of a business transaction. For instance, accepting gifts from suppliers that exceed triviality limits may compromise our buyer decision-making objectivity and may create expectations that we will favour a supplier over another based on the gift and not the product/service they sell.
The following constitute some of the key rules to apply when offering or receiving gifts, hospitalities and entertainment. They have to:

- be reasonable and have a legitimate business purpose
- not be made with the intention of interfering with the exercise of independent judgment in the best interests of Flying Tiger Copenhagen
- be occasional, transparent and given openly
- comply with the law
- be consistent with local custom and practice
- not violate the giver’s or receiver’s policies on the matter
- never be cash or equivalent to cash (e.g. gift card)

**What does this mean to you?**

You must never, directly or indirectly, request or accept a gift, participate a dinner or entertainment that does not adhere to the above guidelines or has not been approved by your manager or CSR & Compliance. To guide you, we have defined a set of limits that should be complied with. However, always use your sound judgement to assess if the offered gift, meal/restaurant/event is of reasonable value and within triviality limits. The limits are enclosed as an appendix to this Code.

If in doubt, always consult your manager, manager’s manager or the Sustainability & Compliance Department.
Conflict of interests

What is conflict of interest?

Conflict of interests may arise if your personal interests compete or conflict with the interests of Flying Tiger Copenhagen. It might appear when dealing with companies in which you have a personal stake and when employing or placing orders with friends or relatives.

What is our position?

Business decisions must be made in the best interest of Flying Tiger Copenhagen and not for personal gain. As a general rule, you should not use your own company, or a company controlled by a related party (spouse, sibling, children, or close friend) to supply goods or services to Flying Tiger Copenhagen. Also, you or a related party to you should not have interests in competing companies with which Flying Tiger Copenhagen has a significant business relationship. Any deviance from these general rules must always be approved by your manager.

What does this mean to you?

Always consult with your manager if you find yourself in a situation that could be perceived as a conflict of interest. For instance, if you need to place an order with friends or relatives, you must get approval. Also, you may refer friends and relatives to seek a job at Flying Tiger Copenhagen, but the employment process must always be handled by an independent person who can ensure fairness.
Fair competition

What is competition law?

Competition law, or anti-trust law, is designed to promote healthy competition by ensuring fair rules for all and preventing agreements (formal and informal) and practices between competitors, suppliers, distributors and customers that can restrict free trade and competition between businesses. Examples of prohibited agreements include price fixing agreements and carving up markets to abuse a dominant market position.

What is our position?

At Flying Tiger Copenhagen, we compete fairly and we respect international and national competition law and do not engage in any activities regarding pricing, customer handling or competition that is in breach with such laws.

What does this mean to you?

You must never discuss, exchange or agree prices or terms with competitors or in any way disclose this information. Competitive information regarding products or pricing must always be found via publicly available sources. Always be careful when discussing market situations in general, e.g. when attending trade fairs. If a discussion comes close to a prohibited subject, then stop the situation immediately.
Donations, contributions and sponsorships

What are donations, contributions and sponsorships?

Supporting local communities and giving donations to charities is good citizenship. It can take the form of product donations, fund-raising activities, awareness-raising campaigns etc. Often the activities will take place in collaboration with local or global charity organisations. Donations can, however, be seen as inappropriate and even considered bribery if not conducted properly and with transparency.

What is our position?

We want to demonstrate good citizenship and we engage in a number of collaborations with both local and global charities to support people in need. Below we have listed 3 key principles to apply when giving charitable donations:

• They must be legal under local laws.
• They may not be linked to any tender or sales process; donations must never be made to encourage the recipient or in any way be made with the expectation of any gain; financial or otherwise.
• We do not make donations and contributions, directly or indirectly, to political parties, organizations, or individuals publicly engaged in politics as this can be seen as a way of obtaining unfair advantage in business transactions.

The Guidelines on Charitable Giving (to be found in the Cooperation Manual) detail the above and provide further guidance.

What does this mean to you?

Whenever you receive a request regarding a donation, contribution or sponsorship, ensure that they adhere to above principles as a first step. If yes, then consult the Guidelines on Charitable Giving.
Books, records and financial reporting

At Flying Tiger Copenhagen, we keep books and records that accurately and completely reflect the company’s transactions and assets. This means that we keep financial records and have appropriate internal controls in place, which evidence the business reasons for making payments to third parties. No undisclosed or unrecorded company funds must be established for any purpose.

Also, we deliver fair and accurate reporting of our financial results in compliance with EU and other national laws and good practice.

What does this mean to you?

You must familiarize yourself with all relevant policies regarding financial transactions, such as reimbursement of business expenses, and comply with these. If in doubt how to handle financial transactions and records and acceptable accounting, always consult with your manager or the Finance Department at Zebra.
Compliance with this policy

Violations of this Code of Conduct or any anti-corruption laws may result in disciplinary action. This may involve civil or criminal penalties or termination of employment at Flying Tiger Copenhagen. All breaches or suspension of breaches of this Code of Conduct should be immediately reported to the one of the following:

1. Manager or manager’s manager
2. The Sustainability & Compliance Department

Any form of retaliation against employees who reports a breach or a suspected reach of this Code of Conduct is strictly prohibited.

If you are in doubt about anything explained in this Code of Conduct or have any questions, please consult the Sustainability & Compliance department at Zebra or write to ethics@flyingtiger.com
Appendix 1 - limits for gifts and hospitalities

Gifts, entertainment and hospitality are acceptable if they are reasonable, proportionate and made in good faith. Below we have defined a set of limits that should be complied with. The limits are global and apply in all countries, which means that in some countries the limit will be of higher market value compared to other markets. For that reason, always use your common sense in the individual situation and always adjust to local practice. And always ask your manager if in doubt.

**Gifts:**

- We only offer gifts of symbolic value and only gifts from Flying Tiger Copenhagen.
- We only accept gifts of symbolic value and if they fall below 500 DKK or a similar amount established by local law. 500 DKK is the amount in DK where you legally can accept gifts without registering the gift as personal income. Other countries may have lower/higher limits that will have to be consulted. We will not accept higher limits, but lower if this is defined in local law.

**Hospitalities:**

- We participate in social events and dinners, however the amount (per occasion, per person) may not exceed 100 EURO.
- We offer hospitality (breakfast, lunch, dinner) to relevant third parties, however the amount (per occasion, per person) may not exceed 100 EURO.

In case any of the above limits are exceeded by up to 100%, approval from your manager is required. If the limits are exceeded by 100% and more, approval from Sustainability & Compliance is required.
Commitment

I have read and understood the content of this Code of Conduct and commit to complying with the principles and standards of the Code.

Date and place ............................................................................................................

Name .........................................................................................................................

Signature ....................................................................................................................