

CODE OF CONDUCT



Logistics Trader

FMC-OTI NO. 024881N

Code of Business Conduct Logistics Trader International

Target audience

All colleagues.

Approver

Founder, General Manager of Logistics Trader International.

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Introduction:

Within foundation, Logistics Trader business practices has been governed by integrity, honesty, fair dealing and in full compliance with all applicable laws national and international. Logistics Trader colleagues have upheld and lived this commitment in their everyday responsibilities ever since.

Logistics Trader Corporate Business Principles prescribe certain values and principles, which the founder has committed to all. This Code of Business Conduct specifies and helps the continued implementation of the Corporate Business Principles by establishing certain non- negotiable minimum standards of behavior in key areas.

The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure questionable activities. Colleagues should seek guidance when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each employee to “do the right thing”, a responsibility that cannot be delegated.

Colleagues should always be guided by the following basic principles:

- avoid any conduct that could damage or risk Logistics Trader and it's partners their reputation;
- act legally and honestly;
- put the Company's and customers interests ahead of personal interests.

1-Compliance with laws, rules and regulations:

“We respect the local and international law at all times”

Logistics Trader and its colleagues are bound by local and international law. Compliance with all applicable laws and regulations must never be compromised. Additionally, colleagues shall adhere to internal rules and regulations as they apply in any given situation. Those internal rules are specific to the Company and may go beyond what is required by the international law.

2-Conflict of interest:

“We will always act in the best interests of our customers and Logistics Trader International”

A Conflict of Interest occurs when personal interests of an employee or the interests Of a third party compete with the interests of Logistics Trader. In such a situation, it can be difficult for the employee to act fully in the best interests of Logistics Trader.

Colleagues shall avoid Conflicts of Interest whenever possible. If a Conflict of Interest situation has occurred or if an employee faces a situation that may involve or lead to a Conflict of Interest, the employee shall disclose it to his or her Manager to resolve the situation in a fair and transparent manner. Although we will do our best to please everyone, always remember that heart is more valuable than currency for Logistics Trader.

3-Families and relatives:

“Our hiring and people development decisions will be fair and objective”

Immediate family members and partners of colleagues may be hired as colleagues or consultants only if the appointment is based on qualifications, performance, skills and experience and provided that there is no direct or indirect reporting relationship between the employee and his or her relative or partner after a tender took place where a minimum of three candidates were presented.

These principles of fair employment will apply to all aspects of the employment, including compensation, promotions and transfers, as well as in case that the relationship develops after the respective employee has joined the Company.

4-Fair dealing:

“We believe in the importance of free competition”

Logistics Trader is prepared to compete successfully in today’s business environment and will always do so in full compliance with all applicable antitrust, competition and fair dealing laws. Therefore, colleagues must at all times adhere to the following rules:

- Commercial policy and prices will be set independently and will never be agreed, formally or informally, with competitors or other non-related parties, whether directly or indirectly;
- Customers, territories or markets will never be allocated between Logistics Trader and its competitors but will always be the result of fair competition;
- Customers will be dealt with fairly and honestly

5-Confidential information:

“We value and protect our confidential information and we respect the confidential information of others”

Confidential information consists of any information that is shared with us and not or not yet public information. It includes business, marketing and service plans, consumer insights, databases, records, salary information and any non-published financial or other data. Logistics Trader continued success depends on the use of its confidential information and its non-disclosure to third parties. Unless required by law or authorized by their management, colleagues shall not disclose confidential information or allow such disclosure. This obligation continues beyond the termination of employment. Furthermore, colleagues must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.

6-Fraud, protecting company assets:

“We insist on honesty and we respect the Company’s assets and property”

Colleagues must never engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of Logistics Trader or any third party. This may not only entail disciplinary sanctions but also result in criminal charges.

Logistics Trader financial records are the basis for managing the Company’s business and fulfilling its obligations to stakeholders.

7-Bribery, gifts and corruption:

“We condemn any form of bribery and corruption”

Colleagues must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party. Moreover, colleagues must refrain from any activity or behavior that could give rise to the appearance or suspicion of such conduct or the attempt thereof.

Colleagues should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient, even if he or she is not a government official, might not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of anything of value for the recipient, including employment or consultancy contracts for closely related parties.

8-Discrimination and harassment:

“We embrace diversity and respect the personal dignity of our colleagues”

Logistics Trader respects the personal dignity, privacy and personal rights of every colleague and is committed to maintaining a workplace free from discrimination and harassment. Therefore, colleagues must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment based on any of the above or any other reason. Colleagues who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with management.

9- Discipline:

- First rule infraction: Verbal counseling.
- Second rule infraction: Written warning.
- Third rule infraction: Suspension from work.
- Fourth rule infraction: Termination.

Logistics Trader is committed to take advance steps in a full coordination with governmental authority and beyond to treasure what is most valuable and that is heart, work and live with our hearts.

Founder, General Manager
M. Bouazani

Logistics Trader International
Mobile, United States