



Code of Conduct

Ethics and Compliance

DUVENBECK GROUP

Code of Conduct for Business Partners

Preamble

- I. Objectives and Scope of Application
- II. Environmental Protection
- III. Human Rights
- IV. Business Ethics
- V. Data Protection and Confidentiality of Information
- VI. Protection of Duvenbeck's Property
- VII. Responsible Supply Chains
- VIII. Compliance with Requirements
- IX. Reporting Violations
- X. Sources

Preamble

At Duvenbeck Group (hereinafter referred to as “Duvenbeck”, “we”, “us”, and “our”), responsible and ethically sound behavior towards our employees, customers, suppliers, business partners, society as a whole, and the environment is a fundamental principle. This commitment includes strict adherence to all applicable local, national, and international laws and regulations.

We recognize our responsibility for the economic, environmental and social impact of our actions, and we expect the same from our business partners, suppliers, sales partners and customers (hereinafter collectively referred to as “business partners”). Each business partner is responsible for understanding and adhering to these general principles of conduct, as outlined in the Code of Conduct for Business Partners (hereinafter referred to as the “Code of Conduct”), in addition to complying with legal requirements, regulations and rules of conduct.

I. OBJECTIVES AND SCOPE OF APPLICATION

This Code of Conduct outlines general duties of conduct regarding respect for human rights, environmental protection and legally and ethically impeccable corporate behavior. It does not supersede requirements with stricter standards in individual countries or specific contractual obligations. The Code sets out the philosophy for daily interactions with employees and business partners, applying to all business activities, including areas not explicitly regulated herein.

Duvenbeck establishes standards and expectations for its business partners, making compliance a prerequisite for a successful and trusting business relationship between us and our business partners. It is binding for both parties.

Business partners commit to contractually passing these requirements to their own partners and taking reasonable steps to communicate these obligations throughout the supply chain. They shall implement appropriate control measures to verify compliance.

Business partner managers are responsible for familiarizing their employees with this Code of Conduct and ensuring compliance. Duvenbeck expects the values of these sustainability requirements to be integrated into business partners' daily operations through structured and knowledgeable management. Business partner managers must identify and evaluate legal and other requirements and train employees to ensure compliance with relevant standards.

II. ENVIRONMENTAL PROTECTION

We recognize the importance of natural resources and consistently aim to operate in a resource-efficient and sustainable manner when providing services. Duvenbeck commits itself and its business partners to continuously improving operational environmental protection, seeking to reduce or eliminate environmental impact to the extent possible, using the most economically justifiable practices and the best available technology. Prevention is regarded as the most economical and sensible approach for the environmentally friendly provision of services.

Duvenbeck and its business partners pledge to comply with all legal, public and customer-specific environmental protection requirements. A sense of environmental responsibility must be promoted among business partner employees at all levels. A high level of qualification and motivation among employees is the primary key to environmentally conscious action. We view environmental protection as a shared responsibility, requiring participation from all Duvenbeck employees and those of business partners according to their responsibilities, knowledge, and skills.

Business partners are actively involved in measures to support operational environmental protection.

- We require our business partners to continuously improve operational environmental protection, aiming to reduce environmental impact to the extent achievable with economically justifiable effort and the best available technology.
- Business partners must continuously improve their company's energy efficiency, ensuring the optimal, purposeful and efficient use of natural, non-renewable resources.

- Business partners must regularly review environmental and energy aspects relevant to their activities and location and analyze their environmental impact.
- Based on identified environmental impacts, business partners shall set environmental and energy targets, defining specific measures and steps to achieve these targets in appropriate environmental and energy programs.
- Business partners must promote a sense of environmental responsibility among their employees at all levels.
- A sense of responsibility for the environment must be promoted among the business partners' employees at all levels.
- Business partners shall establish and implement procedures to monitor compliance with their environmental and energy policy.
- Upon request, the public should receive all necessary information to understand the environmental impact of the company's activities, and open dialogue should be maintained with the public.
- Business partners are committed to proactive, environmentally conscious action through an appropriate environmental and energy program with the specific aim of reducing greenhouse gas emissions as much as possible. Maintaining clear air quality is a top priority for business partners. Business partners also commit to handling drinking water, wastewater and energy resources in an environmentally responsible and careful manner. They are required to minimize waste generated in business activities through effective waste management. Business partners are expected to handle chemicals in a safe and careful manner, not only for occupational safety reasons but also to minimize environmental impact.
- Business partners commit to ensuring that their sustainability policies are applied to their own business partners throughout the entire supply chain in an appropriate manner.

III. HUMAN RIGHTS

Business partners commit to complying with the conventions of the International Labor Organization (ILO), as amended from time to time, particularly focusing on fundamental rights at work.

Dealing with Employees

As a logistics company operating throughout Europe, Duvenbeck thrives on cultural interaction between its various branches. The “culture of logistics” has many facets for us, forming a vital aspect of personal interactions and serving as the foundation of many logistics services cultivated for our business partners over the past decades.

Our company does not tolerate discrimination. Respect and mutual regard are core values at Duvenbeck, regardless of an employee’s hierarchical level. We respect all employees equally, irrespective of their gender, age, ethnic origin, skin color, culture, sexual identity, disability or religious affiliation.

We emphasize respectful and tolerant behavior, recognizing the dignity of every individual. Harassment, bullying and intimidation are not tolerated.

We expect our business partners to comply with these codes of conduct, as well as with applicable labor law requirements for their employees, and to respect the rights of their employees.

Health and Safety in the Workplace

Duvenbeck places great importance on ensuring that all employees work in safe and healthy conditions. These conditions are continuously developed and maintained at the highest possible standard based on the latest information. Extensive measures to prevent accidents are key tools in this effort.

Our business partners are expected to implement and adhere to regulations and procedures to ensure the health and safety of their employees and prevent accidents and injuries in the workplace. Business partners must inform their employees about risk-reduction measures and provide appropriate training. They must also supply employees with suitable protective equipment free of charge.

The working and living conditions of employees must comply with the applicable minimum hygiene requirements.

We do not commission or employ private or public security forces to protect business projects if using these forces could lead to human rights violations due to a lack of proper training or company control. Business partners are also required to ensure this standard in their own operations.

Remuneration and Benefits such as Wages and Social Benefits

The wages and social benefits paid for a normal working week at business partners must at least comply with the applicable legal requirements, such as continued payment of wages in case of illness

and the guaranteed minimum wage. They should be based on industry-specific, local wages and benefits, ensuring an appropriate standard of living for business partner employees. Payment must be made directly, in full, and on time.

Working Hours

Business partners must ensure that their employees' working hours comply with respective national legal requirements and ILO minimum standards. Unless otherwise required by law, a regular working week shall not exceed 48 hours or 60 hours in emergency situations, including overtime. Business partner employees shall have at least one day off per seven days.

Freedom of Association

Business partners shall recognize the right of all employees to join and be represented by legally compliant representative bodies to protect and represent their fundamental rights. Employees at all levels must have the right to peaceful assembly and freedom of association. Their right to freedom of expression must not be restricted, especially through threats, intimidation or violence.

Ban on Child Labor

Duvenbeck does not tolerate child or forced labor at its suppliers. Child labor includes employing persons younger than 15 years of age or younger than the statutory minimum age in countries where it is above 15 years. Business partners must ensure that prohibited child labor is not used.

Prohibition of Modern Slavery, Human Trafficking and Unethical Recruitment

Business partners must take appropriate and reasonable measures to prevent debt bondage, forced and compulsory labor and any form of modern slavery and human trafficking in their own business and along the supply chain. Business partners must ensure that employment relationships are voluntary and can be terminated by employees at their own will and with reasonable notice.

Upon recruitment, business partner employees shall receive a contract in a sufficiently documented form (e.g. in writing or electronic form), in accordance with applicable law, written in a language they understand and which truthfully and clearly sets out their rights and obligations.

In addition, business partners must not deceive prospective employees about the nature of the work, charge employees recruitment fees or unreasonable transportation costs, and/or confiscate, destroy, conceal or deny access to employees' passports or other government-issued identification documents. Furthermore, business partners must not restrict employees' freedom of movement or require employees to use company-provided accommodations involuntarily without a valid business reason.

Rights of Minorities and Indigenous People, Land, Forest and Water Rights

We respect and uphold the rights of local communities to adequate living conditions, education, employment, social activities and the right to free, prior and informed consent (FPIC) to developments that affect them and the land on and in which they live. Particular attention is paid to vulnerable groups.

We avoid forced evictions and the seizure of land, forests and waters when acquiring, developing or otherwise using these resources. We expect the same commitment from our business partners.

Physical Integrity

Physical integrity is of paramount importance to our business partners, who take appropriate measures to ensure this legally protected right is respected. Business partners must ensure that their own business operations and supply chain are free from any involvement, complicity or participation in kidnappings, torture, killings or similar acts. Corporal punishment must not be used in disciplinary measures. Furthermore, business partners must ensure that other serious human rights violations and abuses are excluded both in their own business operations and along the supply chain. This includes sexual violence, war crimes or, other serious violations of international humanitarian law, crimes against humanity or genocide.

IV. BUSINESS ETHICS

Prohibition of Corruption

Duvenbeck firmly rejects any form of bribery or corruption in dealings with business partners or public officials. Our business relationships are based solely on objective criteria, including sustainable quality, reliability, competitive prices and compliance with ecological and social standards.

Duvenbeck's business partners and their employees must not offer or grant any advantages to customers, suppliers, other third parties, public officials or Duvenbeck employees to influence their decision-making. Likewise, Duvenbeck's business partners are prohibited from demanding or accepting such advantages in connection with the initiation, award or execution of a contract. This prohibition of corruption applies without restriction, regardless of the country, recipient, or reason for granting or offering an advantage. Business partners and their representatives must comply with global anti-corruption laws in force. This obligation must be passed on to the business partner employees.

Compliance with Antitrust Regulations

Business partners must adhere to rules that ensure fair competition. Prohibited cartel agreements and concerted practices that restrict competition between competitors may not be entered into.

This includes, in particular, price agreements, division of regional markets and the allocation of customers. Similarly, certain “vertical” restrictions on competition between Duvenbeck and business partners may be inadmissible, in which Duvenbeck, therefore does not participate. If the suppliers hold a dominant market position due to their market position, this position must not be abused.

Import and Export Controls

The business partners must strictly observe compliance with all applicable laws for the import and export of goods, services and information. In addition, the applicable sanctions lists must be observed.

Business partners shall ensure that all taxes, duties and royalties levied in connection with the extraction, trade and export of minerals in conflict and high-risk areas are paid in accordance with applicable law.

Avoidance of Conflicts of Interest

Business partners must make decisions solely on the basis of objective criteria without being influenced by extraneous interests or relationships.

Prohibition of Money Laundering and Terrorist Financing

In their business operations, business partners must ensure compliance with applicable legal provisions against money laundering. They must exclude the possibility that their business activities contribute to the direct or indirect support of non-state armed groups.

V. DATA PROTECTION AND CONFIDENTIALITY OF INFORMATION

Duvenbeck treats the confidential and personal data of employees, business partners and other groups of individuals as strictly confidential. We collect, process and use data of our employees and business partners exclusively within the scope of what is permitted by law or contract. Transfer of data to third parties is prohibited unless covered by legal or contractual provisions. Likewise, we expect our business partners to comply with data protection regulations, safeguard business and trade secrets and protect any data entrusted to them. Information about Duvenbeck may not be communicated to third parties unless it is publicly accessible, mandatory to disclose (e.g. an obligation to provide information to authorities) or has been previously agreed upon between the parties. Business partners must also ensure their employees adhere to these requirements. All business partners are obliged to protect Duvenbeck’s business secrets.

VI. PROTECTION OF DUVENBECK'S PROPERTY

The business conduct of Duvenbeck's partners includes the obligation to handle Duvenbeck's property properly and with care. Duvenbeck's property must be protected. Work equipment provided should only be used for business purposes, unless expressly agreed otherwise. This principle also applies to third-party property made available to business partners within the context of the business relationship with Duvenbeck.

Protection of Intellectual Property

Duvenbeck expects business partners to use and protect intellectual property, such as inventions, designs and images of the Duvenbeck group of companies, as well as any intellectual property of customers and third parties, in an appropriate manner. This protection extends to patents, copyrights and trademarks.

Protection Against Counterfeit Parts and Plagiarism

To minimize the risk of using or distributing counterfeit parts or plagiarism, Duvenbeck expects its business partners to comply with methods and processes for detecting counterfeit parts when purchasing products and services.

VII. RESPONSIBLE SUPPLY CHAINS

We aim to promote good working conditions and environmental responsibility throughout the entire value chain.

To identify and minimize sustainability risks in the supply chain, business partners must disclose information about their supply chains to Duvenbeck upon request, as required to fulfill our legal obligations. Business partners are also obliged to impose a corresponding disclosure obligation to their suppliers, which must be passed on at each level of the supply chain.

Specifically, business partners may be required to disclose their supply chain up to the point of origin and provide evidence of management systems or third-party verifications that exclude sustainability risks in the supply chain.

VIII. COMPLIANCE WITH REQUIREMENTS

Duvenbeck reserves the right to verify compliance with sustainability requirements through suitable and appropriate means. This verification may occur before concluding a new contract and throughout the entire business relationship on a regular, random or ad hoc basis.

The review process may include, for example, a risk assessment of the business partners' relevant business area, business partners' self-disclosure and/or on-site expert review. Such an on-site review shall only take place in the presence of business partner representatives during regular business hours and in compliance with applicable law, particularly regarding data protection. Business partners must implement suitable and appropriate measures that grant Duvenbeck the right to conduct such audits at business partner premises, if necessary, to fulfill legal obligations.

In the event of an actual or imminent breach of the business partner's requirements, Duvenbeck is entitled to take immediate and appropriate measures to prevent, end or minimize the extent of the breach.

In this event, business partners are obliged to take all reasonable measures to prevent or end this violation or to minimize the extent of the violation. If the breach cannot be resolved in the foreseeable future, business partners must immediately develop and implement a plan to terminate or minimize the breach (including a specific timetable). If required by law, Duvenbeck shall be appropriately involved in the development of this plan.

Business partners must pass on and ensure these obligations and measures throughout their entire supply chain.

In the event of a breach of the requirements, Duvenbeck reserves the right to terminate the contract, either ordinarily or extraordinarily.

IX. REPORTING VIOLATIONS

Reporting Misconduct

Misconduct must be identified early, addressed and remedied immediately to protect employees, business partners, third parties and Duvenbeck. This requires the attention and willingness of everyone to point out serious breaches of the rules when there are concrete indications.

Business Partner Complaints Procedure

Business partners must establish a complaints procedure appropriate to their company. The system must allow their own employees and other potentially affected individuals to raise concerns about business ethics, human rights or the environment anonymously, confidentially and without fear of retaliation. Business partners must not take any action that hinders, obstructs or impedes access to the grievance procedure. Business partners are required to contractually pass on these obligations to their suppliers and ensure, as far as possible and reasonable, that the obligations are passed on throughout the supply chain.

Düvenbeck Whistleblower System

Düvenbeck values relevant information from business partners, customers and other third parties. We offer all parties the opportunity to report potential misconduct by employees, business partners or their business partners in dealings with Düvenbeck through our whistleblower system, the Düvenbeck Hintbox.

All information and contact options can be found under the “Compliance” tab on our website (<https://www.duvenbeck.de>)

Business partners must ensure that their employees have unhindered access to Düvenbeck’s whistleblower system and must refrain from any action that hinders, blocks or impedes access.

X. SOURCES

This Code of Conduct is based in particular on nationally and internationally recognized standards, such as the Universal Declaration of Human Rights, particularly as outlined in the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights.