

# SUPPLIER CODE OF CONDUCT



<b>FOREWORD</b> .....	<b>4</b>
SCOPE OF APPLICATION .....	4
<b>1. CORPORATE RESPONSIBILITY</b> .....	<b>5</b>
HUMAN RIGHTS.....	5
EQUAL OPPORTUNITY AND NON-DISCRIMINATION .....	5
RIGHTS OF REFUGEES AND MIGRANTS .....	5
INDIGENOUS PEOPLE AND MINORITIES .....	6
NO CHILD LABOUR AND HUMAN TRAFFICKING .....	6
FORCED AND COMPULSORY LABOR.....	6
FREEDOM OF ASSOCIATION .....	6
PRODUCT SAFETY .....	6
SAFETY IN THE WORKSPACE AND WORKING HOURS.....	6
RENUMERATION AND MINIMUM WAGE .....	7
FINANCIAL RESPONSIBILITY .....	7
<b>2. ENVIRONMENTAL AND CLIMATE PROTECTION</b> .....	<b>7</b>
COMPLIANCE WITH LEGAL PROVISIONS .....	7
IMPLEMENTATION AND APPLICATION OF ENVIRONMENTAL MANAGEMENT SYSTEMS.....	8
INCREASE ENERGY AND RESOURCE EFFICIENCY .....	8
GREEN HOUSE GAS.....	8
WATER CONSUMPTION .....	8
WASTE .....	8
HAZARDOUS SUBSTANCES .....	9
<b>3. TRANSPARENT BUSINESS RELATIONSHIPS</b> .....	<b>9</b>
AVOIDING CONFLICTS OF INTEREST .....	9
PROHIBITION OF CORRUPTION .....	9
GIFTS, HOSPITALITY AND INVITATIONS .....	9
STATES AS CUSTOMERS AND DEALING WITH AUTHORITIES.....	10
CONSULTANTS AND AGENTS.....	10
<b>4. FAIR MARKET CONDUCT</b> .....	<b>10</b>
FREE COMPETITION .....	10
EXPORT CONTROL.....	10
MONEY LAUNDERING .....	10

TRANSPARENT BUSINESS REPORTING.....	11
CONFLICT MINERALS .....	11
<b>5. PROTECTION OF DATA, BUSINESS SECRETS, AND COMPANY ASSETS.....</b>	<b>11</b>
DATA PROTECTION .....	11
INFORMATION SECURITY.....	11
INTELLECTUAL PROPERTY AND RIGHT.....	12
SECURITY OF THE INTERNATIONAL SUPPLY CHAIN .....	12
REPORTING AND WHISTLEBLOWING .....	12
EMERGENCY PREPAREDNESS AND BUSINESS CONTINUITY .....	12
<b>LEGAL CONSEQUENCES OF VIOLATING THE SUPPLIER CODE OF CONDUCT.....</b>	<b>13</b>
ACKNOWLEDGEMENT OF THE RÖHLIG SUPPLIER CODE OF CONDUCT .....	13

## FOREWORD

Röhlig Logistics and its subsidiaries form a global enterprise that is steeped in tradition and operates in many areas within the Freight Forwarding Business. Being such a global company means Röhlig Logistics and its subsidiaries have a responsibility towards their customers, employees, stakeholders and the environment.

This corporate responsibility has propelled Röhlig Logistics and all its global partners to set forth principles and guidelines that are key for economic, social, and environmental sustainability to ensure long-term success of its stakeholders.

These principles and operational guidelines include but are not limited to compliance with all applicable laws and regulations in various jurisdictions across the globe, conducting business in an ethical manner and acting with integrity.

As such, where applicable and required by Röhlig Logistics all Suppliers and Business Partners are required to adhere to the principles embodied in this Supplier Code of Conduct and to use reasonable efforts to ensure that their own suppliers will also comply with these principles and guidelines.

## SCOPE OF APPLICATION

In line with the corporate responsibility strategy pursued by Röhlig Logistics and its subsidiaries, the company expects its Suppliers (i.e., all contracting parties that supply Röhlig Logistics and its subsidiaries with services) and Business Partners (including those with an intermediary and/or representative function acting in the legal interests or on behalf of Röhlig Logistics and its subsidiaries and their employees) to act responsibly and undertake to observe the basic principles outlined in this Supplier Code of Conduct.

In the event Suppliers or Business Partners commission third parties (e.g., subcontractors or representatives) in their dealings with Röhlig Logistics and its subsidiaries, Röhlig Logistics and its subsidiaries expect those third parties to also observe the principles laid down in this Supplier Code of Conduct.

Röhlig Logistics and its subsidiaries reserve the right to send experts to inspect the business premises of its Suppliers and Business Partners for compliance with the requirements listed below on a case-by-case basis. (Advance notification will be given of such inspection) The inspection will take place during normal business hours in the presence of a representative from the Supplier or Business Partner and in strict compliance with all applicable laws, particularly with data protection laws.

# 1. CORPORATE RESPONSIBILITY

Corporate responsibility involves a duty to comply with all rules and regulations in force within a given jurisdiction. Röhlig Logistics and its subsidiaries expect its Suppliers and Business Partners to adhere to such laws and observe the basic principles listed below regarding.

## HUMAN RIGHTS

Suppliers and the Business Partners of Röhlig Logistics and its subsidiaries must respect and protect the regulations in force worldwide to protect human rights as a fundamental and general requirement. This also involves Röhlig Logistics and its subsidiaries, Suppliers and Business Partners refraining from employing forced or child labor.

All people who carry out services for Röhlig Logistics and its subsidiaries, whether directly as employees of Röhlig Logistics and its subsidiaries or indirectly as employees of our Suppliers and Partners, must be treated decently and with dignity.

Suppliers and Business Partners should also be committed to the United Nations' international code of human rights, the "UN Guiding Principles on Business and Human Rights," the ten principles of the "UN Global Compact," and the internationally recognized standards of the International Labor Organization (ILO).

## EQUAL OPPORTUNITY AND NON-DISCRIMINATION

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must not discriminate on grounds, for example, of ethnic, national, or social origin, race, gender, religion, views, age, disability, sexual orientation, political views insofar as they are based on democratic principles and tolerance toward those of a different opinion, or any other legally protected characteristics.

As a Supplier or Business Partner, you must recognize and support equal human rights and adopt a stand on discrimination, differential treatment, harassment, inappropriate or unreasonable interference with work performance, whether based on nationality, race, disability, or gender, including gender identity or gender expression, sexual, religious, or political orientation, ethnic or social background.

Suppliers and Business Partners must provide a workplace free of harassment and discrimination and take any incidences of such nature seriously when they do occur and discharge the appropriate disciplinary action accordingly.

## RIGHTS OF REFUGEES AND MIGRANTS

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must stand firmly for the rights and dignity of refugees and migrants and treat all individuals, regardless of their origin or status, with respect and fairness. We support policies and practices that promote inclusivity, equality, and the protection of vulnerable populations.

## **INDIGENOUS PEOPLE AND MINORITIES**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners are to treat minorities and indigenous people equally in their individual and collective rights; cultural rights and identity; rights to education, health, employment, language, and others. Röhlig and its subsidiaries outlaw discrimination against indigenous people and promote their full and effective participation in all matters that concern them.

## **NO CHILD LABOUR AND HUMAN TRAFFICKING**

Child labor and human trafficking in all their forms is condemned. Röhlig Logistics and its subsidiaries, Suppliers, and Business Partners must pledge to adhere to international labor standards and local laws that prohibit child labor and human trafficking and commit to the abolition of child labor within the entire sphere of influence.

## **FORCED AND COMPULSORY LABOR**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must not engage in, knowingly complicit in or knowingly benefit from the use of forced or involuntary labor whether bonded, imprisoned, or indentured, including debt servitude and human trafficking. They must categorically reject forced and compulsory labor in all forms. They must commit to the abolition of forced and compulsory labor within our entire sphere of influence. All work must be voluntary, and employees must have the option to terminate the work or employment relationship at any time. No employee shall be subjected to unacceptable treatment or harassment.

## **FREEDOM OF ASSOCIATION**

The basic right of all employees to form trade unions and employee representations and to join them is recognized. In countries where this right is restricted by local laws, alternative legitimate options for employee participation are to be supported. Employee representatives must be protected from discrimination. They shall be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner. The Supplier and Business Partner shall respect the right of employees to freedom of association, to join trade unions, to appoint representatives and to join works councils in accordance with applicable local laws. It must be possible for all employees to communicate openly and without fear of reprisals or harassment.

## **PRODUCT SAFETY**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must comply with all applicable legal product safety regulations and requirements, particularly legal requirements pertaining to the safety, labelling and packaging of products, as well as the use of dangerous substances and materials.

## **SAFETY IN THE WORKSPACE AND WORKING HOURS**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must comply with the relevant legal regulations for health and safety in the workplace. They must therefore support the further development and improvement of working conditions.



Suppliers and Business Partners are expected to ensure that they have implemented procedures to ensure a healthy and safe physical and psychological working environment and have taken appropriate measures to prevent the use and abuse of alcohol, drugs, or other unlawful substances by its personnel during working hours and at any of their premises. By setting up and using suitable occupational health and safety systems, the necessary preventive measures are taken against accidents and damage to health that may occur in connection with activities at the workplace. Employees are regularly informed about the applicable health and safety standards and measures and are trained accordingly.

Working hours must correspond at least to the respective national legal standards or the minimum standards of the respective national economic sectors.

### **RENUMERATION AND MINIMUM WAGE**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners ensure that employees are commensurately remunerated, corresponding at the very least to the legally valid and guaranteed minimum rates. Where legal or collective bargaining agreements do not exist, compensation and benefits are based on industry-specific collective agreements customary to the respective location that ensure an appropriate standard of living for the employees and their families. If the wage is not sufficient to cover the usual cost of living and at the same time provides the employee with a minimum level of savings, the Supplier and Business Partner is obliged to increase the employee's wage to reach a level sufficient for this purpose. All benefits required by law shall be provided to employees. Wage deductions as a punitive measure are not permitted.

### **FINANCIAL RESPONSIBILITY**

Suppliers and Business Partners shall maintain detailed records that accurately record all financial transactions and information regarding their business activities.

## **2. ENVIRONMENTAL AND CLIMATE PROTECTION**

Röhlig Logistics and its subsidiaries are keen to make a significant contribution to environmental and climate protection and have a group-wide Environmental Policy. Röhlig Logistics and its subsidiaries expect their Suppliers and Business Partners to observe the basic principles that follow.

### **COMPLIANCE WITH LEGAL PROVISIONS**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must take responsibility when it comes to environmental protection concerns and comply with all applicable legislation relating to the environment and its sustainability including any management and reporting obligations.

## **IMPLEMENTATION AND APPLICATION OF ENVIRONMENTAL MANAGEMENT SYSTEMS**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must continuously improve their environmental performance. Suppliers and Business Partners are encouraged to implement suitable environmental management systems (e.g., in accordance with ISO 14001 or the EMAS Directive of the European Union).

When Supplier or Business Partner undertake contractual obligations on behalf of Röhlig Logistics and/or its subsidiaries, it is expected to assume part of a common responsibility for the general upkeep of the environment.

## **INCREASE ENERGY AND RESOURCE EFFICIENCY**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must strive to use natural resources sparingly and minimize environmental pollution in their processes and products. Where applicable Suppliers and Business Partners, just like Röhlig Logistics and its subsidiaries, must endeavor reducing their energy consumption and CO2 emissions. Energy consumption is to be monitored and documented.

## **GREEN HOUSE GAS**

Greenhouse gas (GHG) emissions are one of the most significant aspects of corporate environmental impact. As the largest contributors to global GHG emissions, businesses, particularly the transport, energy, and industrial sectors, have a responsibility to track and reduce their emissions.

The GHG Protocol classifies GHG emissions into three scopes:

Scope 1 (direct emissions)

Scope 2 (indirect emissions)

Scope 3 (indirect emissions)

Röhlig Logistics and its subsidiaries are committed and expects from its Suppliers and Business Partners to align with the EU aim to be climate-neutral by 2050 and to strive to develop a sustainable decarbonization strategy.

## **WATER CONSUMPTION**

Clean water is a limited natural resource that requires conservation. We require Röhlig Logistics and its subsidiaries, Suppliers and Business Partners to improve measures to increase water efficiency, waste avoidance and awareness to help to reduce water consumption.

## **WASTE**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners are expected to involve in a common and structured way to focus on waste reduction, waste segregation, selection of waste disposal suppliers and measuring business waste according to the Waste Framework Directive of the European Commission.



## **HAZARDOUS SUBSTANCES**

Chemicals and other materials that pose a risk if released into the environment shall be identified and managed in a manner that ensures the safe handling, transportation, storage use and recycling or disposal of these materials. To avoid contamination of soil and water, appropriate emergency measures must be prepared. The responsible personnel must be regularly trained about the handling of hazards and countermeasures.

## **3. TRANSPARENT BUSINESS RELATIONSHIPS**

Openness and transparency are key to building credibility and cultivating trust in business practice. Röhlig Logistics and its subsidiaries expect Suppliers and Business Partners to observe these basic principles.

### **AVOIDING CONFLICTS OF INTEREST**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must take decisions based solely on objective criteria and not to allow themselves to be guided by personal interests or relationships.

Conflicts of interest may include outside business activities, personal financial interest, inside information, employment of, buying from, or selling to family members and close personal friends.

Conflict of interest between a Supplier, a Business Partner and employees of Röhlig Logistics and its subsidiaries must be avoided.

### **PROHIBITION OF CORRUPTION**

Röhlig Logistics and its subsidiaries have a zero-tolerance approach towards bribery and corruption and complies with all applicable anti-bribery and corruption legislation in all the countries they operate in.

It is therefore imperative that Suppliers and Business Partners, likewise, must do not tolerate any form of bribery or corruption. Suppliers and Business Partners must ensure that their employees, subcontractors, or representatives do not grant, offer, or accept any bribes, kickbacks, inadmissible donations, payments, or benefits to or by customers, officials or other third parties including so-called “facilitation payments” (e.g., illegal payments to accelerate administration matters that are routinely encountered).

### **GIFTS, HOSPITALITY AND INVITATIONS**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners do not offer Röhlig Logistics and its subsidiaries employees or third parties any inappropriate benefits either directly or indirectly in the form of gifts, hospitality, or invitations to unduly influence them. Neither do they ask for, nor accept such benefits.

## **STATES AS CUSTOMERS AND DEALING WITH AUTHORITIES**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners consistently comply with the strict legal provisions when dealing with governments, authorities, and public institutions. When taking part in a public solicitation for bids, they comply with legal regulations and abide by the rules of free and fair competition.

## **CONSULTANS AND AGENTS**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners only employ consultants or agents in line with the applicable laws. They take particular care to ensure that consultants or agents are only remunerated for consulting and agency services rendered.

## **4. FAIR MARKET CONDUCT**

Röhlig Logistics and its subsidiaries are a fair and responsible market participant and are committed to always complying with all applicable competition and anti-trust legislation.

Röhlig Logistics and its subsidiaries also expect their Suppliers and Business Partners to exercise the same degree of diligence and must not conclude any contracts or agreements, formal or informal, with the purpose or likely effect of substantially limiting competition. Suppliers and Business Partners are expected to observe the basic principles such as the following.

### **FREE COMPETITION**

Röhlig Logistics and its subsidiaries will always comply with the anti-trust legislation in force in any countries that we operate in. Likewise, Röhlig Logistics Suppliers and Business Partners are expected to comply with all applicable competition and anti-trust legislation. This means, among other things, not to engage in price fixing, market sharing, bid rigging or customer allocation.

Suppliers and Business Partners are expected not to enter into any anti-competitive agreements with competitors, suppliers, or customers and if they are in a dominant position on the market, they do not abuse that position.

### **EXPORT CONTROL**

Röhlig Logistics and its subsidiaries, Suppliers and Business Partners must make sure that they comply with all applicable legal provisions for importing and exporting goods, services, and information. Röhlig and its subsidiaries further adhere to applicable national and international foreign trade control laws pertaining to business transactions with countries, companies, and persons (sanctions), and the transfer of goods and services, software, or technology between countries (export control).

### **MONEY LAUNDERING**

Röhlig Logistics and its subsidiaries, only conduct business relationships with those business partners whose integrity of which they are convinced. The Business Partner and Supplier must

10

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ensure the applicable legal money-laundering provisions are not breached. Therefore, Röhlig Logistics and its subsidiaries call upon all Suppliers and Business Partners not to engage in or partake in any activity that facilitates money laundering.

#### **TRANSPARENT BUSINESS REPORTING**

Röhlig Logistics and its subsidiaries publish business information and report on their business activities truthfully and in line with the applicable laws.

#### **CONFLICT MINERALS**

Suppliers and Business Partners of Röhlig Logistics are obliged to comply with all relevant laws and due diligence requirements related to the sourcing of minerals and materials from conflict-affected and high-risks regions. This includes measures to prevent contributions to human rights abuses, corruption, financing of armed group. This commitment promotes responsible mineral sourcing and supports of peace and stability in conflict-affected regions.

## **5. PROTECTION OF DATA, BUSINESS SECRETS, AND COMPANY ASSETS**

Confidential data, business and trade secrets, and company assets must be protected at all times. Röhlig Logistics and its subsidiaries do and expect their Suppliers and Business Partners to follow applicable data protection laws and regulations in their respective regions and to observe the basic principles stated below.

#### **DATA PROTECTION**

To comply with data protection obligations, Röhlig Logistics, and its subsidiaries, have issued binding corporate rules ensuring that collected personal data is not corrupted, copied, stolen, disclosed, misused, or made accessible to persons without adequate authorization and approval.

Röhlig Logistics Suppliers and Business Partners are mandated to observe and adhere to all data protection laws in force in their jurisdictions to protect the personal data of employees, customers, suppliers, and other parties concerned.

#### **INFORMATION SECURITY**

Data that are processed in IT systems must be protected in the best way possible and at least sufficiently to meet legal requirements. Röhlig Logistics Suppliers and Business Partners must be aware of the importance of information assets and must ensure their appropriate technical protection against unauthorized access. Data and information must be secured against alteration, falsification or loss and the systems and processes must be regularly checked for any need for action.

## **INTELLECTUAL PROPERTY AND RIGHT**

Röhlig Logistics and its subsidiaries, respect the know-how, patents, trade, and business secrets of all its stakeholders and do not pass such information onto third parties without their express prior written consent.

Likewise, Suppliers and Business Partners of Röhlig Logistics and its subsidiaries are not allowed to disclose any confidential or proprietary information received during or after collaboration with Röhlig Logistics and its subsidiaries to unauthorized individuals or any external parties.

All Suppliers and Business Partners should be guided by the Non-Disclosure Agreement (NDA) they signed with Röhlig and adhere to the relevant contractual obligations.

## **SECURITY OF THE INTERNATIONAL SUPPLY CHAIN**

Suppliers and Business Partners must ensure that the business premises, the loading, and shipping areas where cargo is stored, prepared, loaded, and transported are protected against unauthorized access.

In efforts to create a secure supply chain, all Röhlig Logistics Suppliers and Business Partners are expected to employ trusted employees and should undertake all efforts necessary to maintain a secure supply chain.

## **REPORTING AND WHISTLEBLOWING**

Reporting and mitigation of issues and concerns may be filed per our whistleblowing reporting and investigation process 1009-3 according to SOP 1009. The whistleblower can make a report concerning Röhlig using a secure, anonymous reporting route via <https://rohlig.iwhistle.de/> which allows reports to be made 24 hours a day, 7 days a week.

Röhlig Logistics follows harassment-free workplace principles and follows a no retaliation policy. It is expected that Supplier and Business Partner establish an effective complaint mechanism for employees who may be affected or have become aware of possible violations of applicable laws and standards. Employees who file a complaint about applicable laws shall not be subject to disciplinary action in any form and shall be enabled to anonymously complaints if required.

## **EMERGENCY PREPAREDNESS AND BUSINESS CONTINUITY**

Suppliers and Business Partners of Röhlig Logistics must maintain robust emergency preparedness and business continuity plans to mitigate risks like natural disasters, cyber threats, disease outbreak or other disruptions in the supply chain. These plans should prioritize personnel safety, asset protection, and minimal operational disruption during emergencies. Suppliers and Business Partners must promptly notify Röhlig Logistics of any supply chain affecting emergencies and provide regular recovery updates. This commitment ensures the integrity of our supply chain and safeguards against potential disruptions.

## LEGAL CONSEQUENCES OF VIOLATING THE SUPPLIER CODE OF CONDUCT

The Business Partner is not only expected to accept the standards defined in this Supplier Code of Conduct, but also to implement management systems in order to ensure compliance with all applicable laws and standards set forth in this Supplier Code of Conduct. Employees, suppliers and subcontractors along the supply chain must be informed in an accessible manner about the content of this Supplier Code of Conduct. Obligations arising from this Supplier Code of Conduct or from national and international statutes may not be circumvented by contract, actively misleading employees or other comparable measures.

If any Supplier or Business Partner does not observe the basic principles laid down in this Supplier Code of Conduct, Röhlig Logistics and its subsidiaries have the right to terminate the business relationship with the Supplier or Business Partner for cause. It is within the discretion of Röhlig Logistics and its subsidiaries to forgo such consequences and, instead, to take alternative measures if the Supplier or Business Partner provides credible assurance and can prove that it has immediately initiated countermeasures to remedy the situation and to prevent comparable violations occurring in the future.

**Any non-compliance with this Supplier Code of Conduct must be reported to Röhlig Logistics or the subsidiaries' contact person.**

### ACKNOWLEDGEMENT OF THE RÖHLIG SUPPLIER CODE OF CONDUCT

As a Röhlig Logistics supplier, we act according to the ethical and legal principles defined in this Supplier Code of Conduct. These requirements are also cascaded by us within our supply chain. We hereby acknowledge the Röhlig Logistics Supplier Code of Conduct and confirm that we will comply with the aforementioned principles and requirements by applying an internal, equivalent Code of Conduct within our company.

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Date / supplier signature and stamp or digital signature/authentication