

CODE OF CONDUCT

For Suppliers and Business Partners

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 in order 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 Partner are required to adhere to the principles embodied in this Supplier and Business Partner 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 and Business Partner 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 and Business Partner Code of Conduct.

Röhlig Logistics and its subsidiaries reserve the right to send experts to inspect the Business premises of its Suppliers and Business Partner 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 Partner to adhere to such laws and observe the basic principles listed below regarding.

HUMAN RIGHTS

Suppliers and Business Partner 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 Partner must also comply with the rules laid down in the ILO Conventions 138 and 182 concerning the minimum age of employment for children.

EQUAL OPPORTUNITY AND NON-DISCRIMINATION

Röhlig Logistics and its subsidiaries, Suppliers and Business Partner must not discriminate on grounds of ethnic, national, or social origin, race, sex, 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 Partner 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.

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.

PRODUCT SAFETY

Röhlig Logistics and its subsidiaries, Suppliers and Business Partner 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 WORKPLACE AND WORKING HOURS

Röhlig Logistics and its subsidiaries, Suppliers and Business Partner 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 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.

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

MINIMUM WAGE

Röhlig Logistics and its subsidiaries, Suppliers and Business Partner ensure that their 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.

2. ENVIRONMENTAL AND CLIMATE PROTECTION

Röhlig Logistics and its subsidiaries are keen to making 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 Partner to observe the basic principles that follow.

COMPLIANCE WITH LEGAL PROVISIONS

Röhlig Logistics and its subsidiaries, Suppliers and Business Partner 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.

INCREASE ENERGY AND RESOURCE EFFICIENCY

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

IMPLEMENTATION AND APPLICATION OF ENVIRONMENTAL MANAGEMENT SYSTEMS

Röhlig Logistics and its subsidiaries, Suppliers and Business Partner must continuously improve their environmental performance. Suppliers and Business Partner with production sites 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.

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 Partner to observe these basic principles.

AVOIDING CONFLICTS OF INTEREST

Röhlig Logistics and its subsidiaries, Suppliers and Business Partner 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 Partner, likewise, must do not tolerate any form of bribery or corruption. Suppliers and Business Partner 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 Partner 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 Partner 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.

CONSULTANTS AND AGENTS

Röhlig Logistics and its subsidiaries, Suppliers and Business Partner 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 complying with all applicable competition and anti-trust legislation at all times.

Röhlig Logistics and its subsidiaries also expect their Suppliers and Business Partner 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 Partner 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 Partner 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 Partner 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 Partner must make sure that they comply with all applicable legal provisions for importing and exporting goods, services, and information.

MONEY LAUNDERING

Röhlig Logistics and its subsidiaries, only conduct Business relationships with those Business partners whose integrity they are convinced of. This goes to the root of ensuring that the applicable money laundering provisions are not breached.

Therefore, Röhlig Logistics and its subsidiaries call upon all Suppliers and Business Partner not to engage in or partake in any activity that facilitates money laundering

BUSINESS INFORMATION

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

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 also expect their Suppliers and Business Partner 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 Partner are mandated to observe and adhere to all data protection laws in force in their jurisdictions in order to protect the personal data of employees, customers, Suppliers, and other parties concerned.

PROTECTION OF KNOW-HOW, PATENTS, TRADE AND BUSINESS SECRETS

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 Partner 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 Partner 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 Partner 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 creating a secure supply chain, all Röhlig Logistics Suppliers and Business Partner are expected to employ trusted employees and should undertake all efforts necessary to maintain a secure supply chain

LEGAL CONSEQUENCES OF VIOLATING THE SUPPLIER AND BUSINESS PARTNER CODE OF CONDUCT

If any Supplier or Business partner does not observe the basic principles laid down in this Suppliers and Business Partner 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 and Business Partner Code of Conduct must be reported to your Röhlig Logistics or the subsidiaries' contact person.

Declaration by the Supplier or Business partner.

We have received a copy of the Röhlig Logistics Supplier and Business Partner Code of Conduct and hereby commit ourselves, to comply with its principles and requirements.

We acknowledge the mandatory request made by Röhlig Logistics to make sure that our operations and all our endeavors when dealing with Röhlig Logistics and its subsidiaries will remain in compliance with all applicable laws.

Location / Date

Company Name & Seal

Bremen, March 2023