

**Code of Procedure**

**Notification System “DACHSER Integrity Line”**

DACHSER Corporate Compliance - Integrity in Logistics

## 1. Submission of complaints

### a. Who should make a complaint?

Our motto "Integrity in Logistics" reflects our expectation that employees, business partners and the public openly raise potential concerns with us about critical activities or serious misconduct within, as well as related to, our company.

Every employee of the DACHSER Group as well as any other third party can submit information to the DACHSER Compliance Office.

### b. Why should you make a complaint?

DACHSER always has the expectation that all business transactions and services are carried out in a legally sound manner and aligns its business activities with the relevant requirements. For this reason, compliance with legal regulations, especially with the DACHSER Code of Conduct and value management, is a top priority.

Only by adhering to these principles it is possible to ensure good corporate governance, prevent misconduct and thus avoid damage to the DACHSER company, its employees, business partners, third parties and the environment.

Information can help to counter serious violations at an early stage. This aims not only to protect individuals but also to protect our company and our business partners.

### c. Which facts can be reported?

Notifications or complaints in connection with DACHSER's compliance management system and the requirements of the LkSG may be made if the possibility of a violation is identified by a whistleblower.

These include:

- violations of competition law
- criminal property offenses
- violations of human rights
  - types of slavery or forced labor
  - child labor
  - non-compliance with occupational health and safety regulations
  - prevention of the right of employees to form associations
  - discrimination based on ethnic origin, gender, religion or belief, disability, age, sexual identity or similar
  - no adequate remuneration of the employee

- violations of environmental regulations
  - water pollution
  - soil contamination or adverse soil changes
  - air pollution
  - harmful noise emissions
  - excessive water use (to the extent that natural livelihoods, such as drinking water, supplies or food, are potentially affected as a result).

Certainly, complaints resulting from the combination of violations can also be submitted.

## 2. Which office can you contact?

If a potential rule violation has been observed or if someone is possibly affected by it himself, a report should be made about it.

It is possible to submit information by telephone, e-mail or in written form to the address given below. Alternatively, the "DACHSER Integrity Line" complaint procedure can be used.

### DACHSER SE

#### Head Office | Corporate Compliance

Thomas-Dachser Str. 2

87439 Kempten

Phone: +49 (0)831 5916 1010

E-mail: [kempten.compliance-office@dachser.com](mailto:kempten.compliance-office@dachser.com)

### "DACHSER Integrity Line" | Compliance Reporting at DACHSER

With "DACHSER Integrity Line", an accessible system is available at all times to submit a report to the Compliance Office. The highly secure system offers full anonymity and complies with all relevant data protection requirements. "DACHSER Integrity Line" can be reached from anywhere at any time via [www.dachser.com](http://www.dachser.com), as well as via the respective country websites.

Regardless of whether DACHSER employees or external persons, there is always the possibility to submit information about possible compliance violations in the company or indications of such violations within DACHSER's business network.

As a matter of course, anyone is free to provide information anonymously. However, it should be noted that reported matters can usually be processed more quickly and effectively if complete contact data.

The information will, of course, always be treated as strictly confidential.

To process the report carefully and purposefully, it is important to submit it as precisely and conclusively as possible. All facts should be presented objectively, accurately, and completely. It is helpful if the questions "Who?", "What?", "When?", "How?" and "Where?" are considered.

### **3. What happens to the information?**

The information will be handled by the Compliance Office with regard for confidentiality and the relevant data protection regulations. In individual cases and depending on the type and severity of the potential offense, we expressly reserve the right to involve the relevant law enforcement authority in the investigation. It may also be necessary in individual cases to involve other employees in the clarification process to ensure that the information is processed carefully.

The report should always be made in good faith. If the review of the report shows that there is no reasonable suspicion or that the facts are not sufficient to justify a suspicion, no disciplinary or criminal measures are to be feared. This does not apply if the platform is deliberately misused for false or misleading reports.

### **4. How are reports processed?**

The reports are processed by the Compliance Office.

The Compliance Office acts:

- independently
- impartially
- under professional supervision
- free from conflicts of interests
- with staff trained to process reports, particularly in connection with the LkSG, and with the necessary time resources to do so.

As far as the whistleblower gives the possibility to contact him via the system, he will receive a confirmation about the receipt of the report.

The Compliance Office, in cooperation with the respective department, examines the facts on a case-by-case basis.

If (imminent) violations of human rights or environmental aspects are discovered, measures to avert or eliminate the damage are initiated immediately.

The measures and their effects are recorded in a report.

## 5. Am I protected as a whistleblower?

If desired, complete anonymity and confidentiality will be maintained. The whistleblower is free to choose whether to publish contact information or to report anonymously.

The name or circumstances of which conclusions about the identity could be drawn, will neither be disclosed to persons who may also be involved nor to the public.

During the entire examination, tips are treated as strictly confidential. Names, personal data or other information that could lead to conclusions about the identity of the person providing the information will not be passed on without good reason.

Personal data will only be processed with the consent of the whistleblower and exclusively for the purpose of processing the notification.

The whistleblower can decide which data he would like to provide. The collection and storage of contact data, the description of the facts and related documents or further information is voluntary. The data is stored for the duration of the processing of the report.

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