

# DACHSER Code of Conduct

DACHSER Corporate Compliance – Integrity in Logistics



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## 1. Foreword

Dear colleagues,

"Integrity in Logistics stands for our network of employees who bring our values to life in their daily work and shape our compliance culture.

DACHSER regards compliance as an integral part of its entrepreneurship and expects all employees to embody this fundamental principle. We are convinced that integrity and trustworthy behavior are the basis for long-term and successful cooperation.

The protection of human rights and the environment is of great importance to us. We are aware of our responsibility. We ensure that everyone along our supply and value chain is treated fairly and that their fundamental rights are respected.

We place great value on respect, trust, tolerance and fairness in our dealings with each other".



Stephan Maruschke

Corporate Director Corporate Governance | Chief Compliance Officer

## 2. Integrity in Logistics

At DACHSER, we comply with all national and international laws and regulations.

Employees must know and comply with the regulations applicable to their area of responsibility. Additional information and advice should be sought in case of uncertainty. The first point of contact should be the respective supervisor.

This DACHSER Code of Conduct applies to all DACHSER employees and bodies worldwide.

Compliance with the requirements described therein contributes to the long-term success of the company.

Violations of the DACHSER Code of Conduct will not be tolerated and will result in disciplinary action.

Violations of applicable legal norms may also result in criminal and liability consequences.



### 3. Our principles

DACHSER attaches great importance to fair competition. Our employees must comply with all competition laws. This means that agreements with competitors on prices, conditions or market sharing as well as unfair business practices are prohibited. Informal discussions or concerted behavior that restricts competition are also not permitted and are condemned in the strongest possible terms.

All members of the DACHSER family are committed to comply with the following principles:

Safeguarding fair competition

Combating corruption

Dealing with public officials

Avoidance of conflicts of interest

Compliance with national and international principals of trade

Protection of business assets & data protection

Environmental protection

Avoidance of discrimination

Supply Chain Due Diligence

Conscientious use of media

DACHSER takes responsibility for its employees and wants to create and maintain an attractive working environment for its employees. DACHSER respects the right of every employee to form employee representatives and to conduct collective bargaining to always regulate working conditions. DACHSER regards competitive and performance-related remuneration and compliance with relevant working time regulations as a matter of course.

DACHSER rejects all forms of human trafficking, child labor and forced labor.

The health of DACHSER's employees should be maintained and promoted. Therefore, it is the company's goal to ensure a high level of occupational safety at all DACHSER production sites. DACHSER expects its employees, especially its managers, to be always committed to occupational safety.

As a member of the DACHSER family, I would like to support the company in its core values and am committed to complying with this Code of Conduct.



### 3.1 Safeguarding fair competition

As a member of the DACHSER family

- I stand for non-manipulated, fair and unrestricted competition.
- I am committed to comply with the applicable laws and regulating competition.
- I reject any coordinated behavior and informal discussions with one or more competitors that could have the consequence of restricting competition.



### 3.2 Combating Corruption

As a member of the DACHSER family

- I am convinced of the efficiency and quality of our services.
- I firmly reject any kind of influence on business partners with money, valuables, or other benefits of monetary value.
- I do not demand any money or valuables in return for the preferential purchase of products or other services.
- I do not accept any benefits that could give the impression of undue influence.
- I do not accept invitations to events or hospitality that go beyond the usual scope.
- I only accept invitations to events or hospitality that are business-related.

- I reject so-called "facilitation payments" and follow the recommendations of the International Chamber of Commerce in this regard.
- I do not accept any gifts or other benefits more than EUR 35 or EUR 300 (for details, see the DACHSER Conduct Guidelines: Benefits), including via third parties. I observe the same rules when awarding benefits to business partners.
- I am aware that I can accept and give customary courtesy and promotional gifts of less value. The same applies to invitations to events that are directly related to my work at DACHSER.



### 3.3 Dealing with public officials

As a member of the DACHSER family

- I observe the special requirements for contact with public officials.
- I am aware that donations to or any other influence on public officials are prohibited in many countries.

### 3.4 Avoidance of conflicts of interests

As a member of the DACHSER family

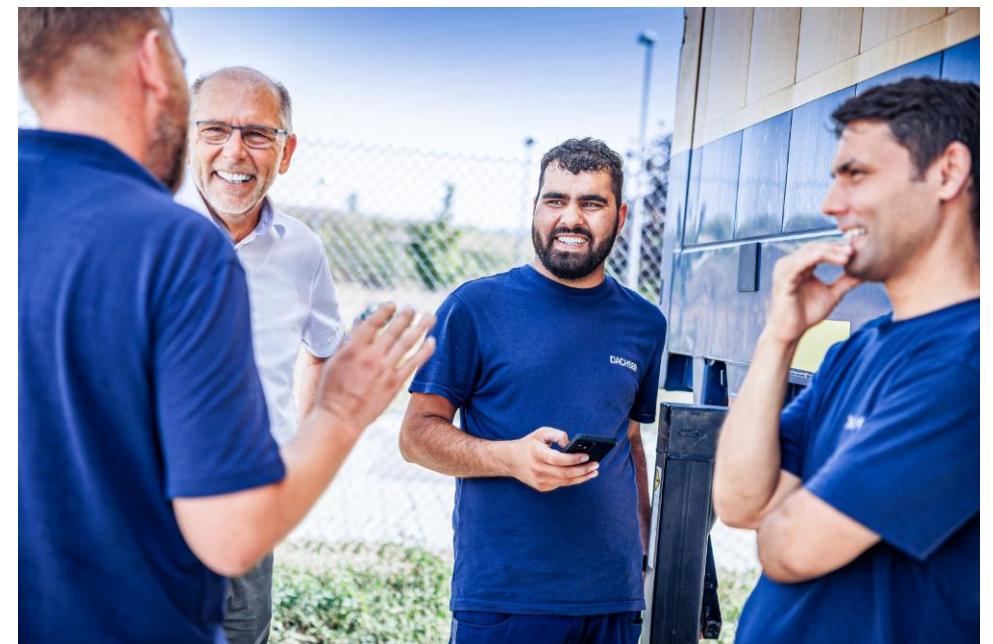
- I avoid conflicts of interest and do not take any activities or tasks that conflict with the interests of DACHSER.
- I do not perform any secondary employment for companies of a competitor, a customer, a partner, or a supplier.
- I am aware that financial interests (greater than 1%) in companies of a competitor, a customer, a partner, or suppliers are only permitted with the written consent of the branch/country management. Irrespective of this, such shareholdings must be disclosed. Such financial interests of close family members must also be disclosed to the branch/country management.
- I ensure that no business partner is favored for private interests. The same applies to my own family members.



### 3.5 Compliance with national and international principles of trade

For DACHSER, compliance with international and national legal requirements and regulations is essential. Compliance with these requirements is not only an obligation for DACHSER, but also stands for the holistic corporate strategy, which also focuses on integrity.

As a member of the DACHSER family



- I adhere to the applicable export and import bans, official approval requirements and customs and tax regulations.
- I am aware of the embargo and sanction regulations relevant to my work at DACHSER and I comply with them.
- I pay particular attention to compliance with anti-terrorism regulations and to compliance with laws to prevent money laundering.
- I do not facilitate any services that may be suspected of supporting illegal transactions.



### 3.6 Protection of business assets & data protection

The protection and conscientious use of business assets are an essential foundation of DACHSER's corporate strategy. DACHSER's success is based on the innovative strength and many years of experience of all its employees.

As a member of the DACHSER family:

- I do not pass on any (company) secrets to unauthorized third parties or use them for my own purposes.
- The protection and conscientious use of handle company assets responsibly and make decisions based on a conscientious and comprehensible risk analysis. This includes checking the integrity of business partners.

- I ensure that all company documents, in particular financial reports, accounting documents and documents relating to other reporting obligations, are correct and transparent.
- I am aware that company assets may not be used for private purposes. I am not permitted to use DACHSER IT systems to view, save or send pages or messages with legally prohibited or offensive content.
- I am aware of the requirements for the use of artificial intelligence in a professional context.
- I comply with all legal requirements regarding data protection.



### 3.7 Environmental Protection

DACHSER contributes to the reduction of greenhouse gas emissions using energy-saving state of the art technologies. DACHSER supports science and practice in the development of new technologies and concepts for emission-free logistics.

As a member of the DACHSER family

- I set a good example when it comes to environmental protection.

- I am actively involved in topics such as waste separation, water conservation, reducing heating costs and using public and/or electric transportation.
- I use resources sparingly, even in everyday life, and comply with all environmental laws.



### 3.8 Avoidance of discrimination

Discrimination of any kind has no place at DACHSER.

As a member of the DACHSER family

- I am actively committed to a working environment in which diversity is valued.
- I respect the dignity, privacy, and personal rights of my colleagues at all times.
- I am guided by objective and comprehensible criteria in my decisions and dealings with others.
- I act free from discrimination, harassment, or disadvantage based on race or ethnic origin, gender, religion or ideology, disability, age, or sexual identity.
- I respect the mutual coexistence of different views of life and cultural and country-specific characteristics.



### 3.9 Supply Chain Due Diligence

As a member of the DACHSER family

- I ensure that applicable laws on due diligence in the supply chain are complied with.
- I take the minimization of risks that may arise from our performance in connection with human rights violations (e.g. forced evictions) and violations of environmental protection very seriously.
- We are committed to ethical and sustainable behavior in the supply chain for which we are responsible.
- I protect our own business activities (if necessary, by using external security forces) in order to prevent human rights violations.

### 3.10 Conscientious use of media

As a member of the DACHSER family

- I am aware that transparent, dialog-oriented, and consistent information to the public - including the media - strengthens DACHSER's global image.
- I therefore only make official statements, especially to the media, after consultation with an authorized manager.

#### 4. Implementation and organization

All DACHSER employees are obliged to behave in accordance with this Code of Conduct.

At DACHSER, we all pull together to bring our Code of Conduct to life and implement it in daily practice. Managers are real role models in this respect: They are not only the point of contact for questions, but also ensure that your employees always have the rules and values in mind.

All employees receive training that is tailored to their tasks and needs.

Our Code of Conduct is always up to date. It is regularly reviewed and adapted if rules or requirements change.

Supplementary codes of conduct have been drawn up for specific areas (e.g. DACHSER Conduct Guidelines: Competition Law), which explain the topic in detail and help employees to comply with internal regulations and country-specific requirements.



#### 5. Whistleblowing

For a functioning compliance management system, it is important to become aware of potential violations at an early stage. This is the only way to identify risks at an early stage and initiate countermeasures.

If employees believe or become convinced that the principles of this Code of Conduct are not being adhered to, they are free to report this via the "DACHSER Integrity Line" whistleblowing system, by telephone, e-mail or in writing to the following contact addresses:

DACHSER SE  
Head Office  
Corporate Compliance  
Thomas-Dachser-Straße 2  
87439 Kempten  
Tel.: +49 831 5916 1010  
[kempten.compliance-office@dachser.com](mailto:kempten.compliance-office@dachser.com)

The whistleblower system complies with all data protection regulations and meets all technical security requirements.

It is ensured that whistleblowers do not have to fear reprisals or other disadvantages.



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