Emons **Verhaltenskodex** Code of Conduct



Foreword

As a leading, highly respected logistics enterprise, Emons Spedition GmbH with all its affiliated companies (collectively referred to as "Emons") is committed to ethical, lawful, environmentally aware and socially responsible enterprise management. "Affiliated companies" are those subsidiaries of the Emons Group in which at least 50 percent of the voting stock is held directly or indirectly by the other company.

We expect the same behavior from all those who do business with Emons.

At Emons, we appreciate people of all genders (m/f/d) equally.

This Code of Conduct describes the standard of behavior that Emons and its general management has chosen to adopt, and which it expects from its employees as well as the subcontractors and suppliers it employs. It reflects the values of Emons and testifies to our commitment to ethical, lawful and responsible behavior. This behavior is a key prerequisite for preserving Emons' high public standing in the global community. Violations of this Code of Conduct can lead to disciplinary action, up to and including termination of employment.

All Emons employees must read and comply with this Code of Conduct.

General behavior

Emons considers itself committed to the goal of exercising its business and social responsibilities in a manner that reflects the utmost integrity and honesty. Our relationships with contract partners, third parties and the public in general have always been based on trust and good will. Only by remaining committed to these principles can we secure the trust, acceptance and goodwill of our contract partners and customers over the long term. Emons' success is the result of the combined efforts of all employees in performing their duties in an ethical manner. In discharging their responsibilities, each employ must constantly strive to:

- Serve our contract parties honestly and fairly, and comprehensively inform them of their rights and obligations.
- Fulfill our contractual obligations and other promises.
- Avoid placing public servants in a compromising position or influencing the judgment of public servants through gifts or payments.
- Promote and sell our services in a responsible and lawful manner.
- Promote the integrity and reputation of Emons by protecting confidential and protected information to which employees gain knowledge in the course of their duties.
- Understand the proper use of our electronic communication systems, including social media.
- And act on behalf of Emons in compliance with all applicable principles, processes, national and international laws and regulations and legal provisions.

Emons expects its subcontractors and suppliers to uphold these standards as well.

Confidentiality and security of information

Our employees recognize that they receive access to confidential and protected information that belongs to Emons, customers, potential customers and business partners in the course of their duties. This information can vary in its nature, including data stored in databases, recommendations and other contents of reports, email messages and attachments, research results, customer lists and details regarding assets, the business operations of customers, personally identifiable information as well as internal documents that relate to the entrepre-neurial approach, strategy and organizational structure of Emons. Regardless of how such information is created, communicated or stored, all employees are responsible for protecting it against unauthorized disclosure, preventing its inappropriate destruction or alteration, ensuring its accessibility and availability on the basis of business requirements, informing Emons in the event of any illegal acquisition or unauthorized access to or use of information. Confidential and protected information may not be used for private purposes, reproduced or unlawfully acquired, and may never be discussed outside the organization or provided to external persons without the express consent of Emons. In this connection, Emons only permits the storage of information on encrypted, portable data media (CDs/DVDs, thumb drives/USB flash drives, portable USB hard drives) to the extent required for business purposes on a case-by-case basis. Downloading to portable data storage can also be monitored.

Furthermore, employees may not copy, retain, access, share or otherwise handle such information following termination of their employment with Emons. All confidential and protected information, including information stored on media, networks or storage locations that do not belong to Emons, must be returned before the end of the employment relationship.

Social and working conditions

Emons' business partners must recognize their employees' basic rights and are obligated to honor these and to treat their employees with respect and dignity in accordance with the understanding of the international community.

In particular, the following standards must be observed, regardless of whether individuals are employed on the basis of fixed-term or indefinite employment contracts, as temporary workers, subcontractors, teleworkers or other forms of employment:

Prohibition of child labor:

The employment of child labor is strictly forbidden under the regulations of the ILO, the United Nations Convention on the Rights of the Child and/or national laws. Children are to be protected from economic exploitation and may not perform work that is dangerous, interferes with the child's education or could endanger the child's health or physical, mental, emotional, moral or social development.

Compensation and benefits:

Emons, its employees and all business partners must comply with all relevant laws, regulations and industry standards governing compensation and benefits. In particular, minimum-wage regulations are to be complied with.

Prohibition of discrimination:

All applicable legal regulations that prohibit discrimination in hiring and employment on the basis of gender, age, religion, political opinion, health status, national or social origins, sexual orientation, ethnicity, skin color and all other legally prohibited differentiations must be complied with.

Health and safety:

All employees must be provided with a safe and healthy workplace that complies with all applicable laws, regulations and industry standards. This applies in particular for building safety, electrical systems, machinery safety measures and personal protection equipment. The processes for identifying risks for health and safety are to be explained to the employees, and the employees are to be actively involved in risk minimization.

Money laundering

It is the responsibility of every employee to be alert and to prevent transactions that could potentially expose Emons to the suspicion of money laundering. Our compliance with the laws on combating money laundering and financing for terrorist and criminal activities in all jurisdictions in which we're active is an expression of our commitment to fair and professional business practices and integrity. Emons is also obligated to take note of and report suspicious transactions or activities. All employees are thus required to report any suspicion or positive knowledge they have of money laundering or financial crime to General Management. Emons also expects its subcontractors and suppliers to comply with the applicable legal provisions for the prevention of money laundering and not take part in money laundering activities.

Environment

Environmental responsibility is essential, and Emons continually strives to improve its environmental performance. Consequently, all employees, and all Emons business partners, are required to comply with all applicable environmental laws, regulations and industry standards. Additionally, guidelines and processes must be implemented to identify, prevent and minimize relevant negative environmental impacts.

Bribery and corruption

Compliance with laws against bribery and corruption throughout the world is not only a legal requirement: it reflects our determination to act according to the highest standards of integrity and honesty. Emons prohibits bribery and corruption in any form. In particular, Emons expects that:

- No person offers anything as a bribe or undertakes to bribe or offers or disburses non-customary or unapproved payments or incentives of any kind in the course of doing business.
- No business is acquired in which a bribe, an off-the-books payment or incentive is offered to customers, prospective customers or third parties.
 All bribes or non-customary payments offered to our own employees in the course of business activities are refused and the offers are reported.
- No funds or assets of Emons are used for any unlawful, impermissible or unethical purpose.

Presents and hospitality, e.g. tickets for sporting events, lunches or dinners can be a normal and customary part of Emons' business operations. However, all elaborate and excessive hospitality or entertainment should be avoided (regardless of whether Emons is the host or recipient). If there is a legitimate business reason for such hospitality or entertainment, it must be approved in advance by the responsible supervisor. Except for promotional items or commemorative objects, employees should avoid giving gifts, regardless of their value. Even modest gifts can be considered a bribe or incentive under applicable laws.

Relationships with third parties

In all cases, Emons expects third parties who work with Emons to comply with all of the principles described above, and in turn communicate these principles to their own subcontractors and suppliers and consider them in the selection process.

Cologne, October 2020

General Management