

DACHSER CODE OF CONDUCT FOR BUSINESS PARTNERS

Dachser Corporate Compliance – Integrity in Logistics

DACHSER Code of Conduct for Business Partners

1. Preamble

DACHSER's motto – "Integrity in Logistics" – represents the company's aspirations with regard to compliance not only for itself but also for its business partners.

DACHSER is convinced that sustainable enterprise depends on integrity in the behavior of every person involved in the process. With honest, reliable and trustworthy conduct, DACHSER hopes to lay the foundation for long-term success in its business relationships.

The Compliance Management System of DACHSER is based on a binding code of conduct and the principles set forth in internationally recognized standards for responsible company management, which should be honored by all participating parties. This commitment must be expressed in our relations with our business partners, too. Therefore, this "DACHSER Code of Conduct for Business Partners" sets compulsory minimum requirements for ethically correct conduct. DACHSER expects its business partners to adhere to and implement these provisions fully.

In concrete terms, DACHSER's expectations of its business partners are as follows:

2. Principles

2.1 Protection of fair competition

As business partners of DACHSER:

- We respect fair competition.
- We adhere to any applicable regulations governing competition. Applicable regulatory provisions generally prohibit agreements and coordination with competitors with regard to prices and terms & conditions, dividing up markets or customers, and other unfair business practices. This includes not only concrete agreements but also any coordinated behavior or informal discussions with the purpose or outcome of restricting competition.
- We acknowledge that exchanging confidential company data under antitrust legislation may impair or restrict competition in an unacceptable manner.

2.2 Controlling corruption

As business partners of DACHSER:

- We guarantee that any applicable anti-corruption laws will be upheld.
- We pledge not to participate in bribery or corruption of any kind.
- We will ensure that any gratuities exchanged within business relationships will be given or accepted only within the limits of the applicable regulatory provisions. In particular, we will see to it that no employee, subcontractor or representative of ours offers, promises or grants benefits to DACHSER employees with the aim of securing orders or preferential treatment.
- We will not assume costs of business entertainment or invitations to events for DACHSER employees beyond what is customary and lawfully permitted.
- We will not offer, promise or grant any such benefits to third parties (such as office-holders) in DACHSER's name.

2.3 Avoiding conflicts of interest

As business partners of DACHSER:

- We will make decisions only based on objective business considerations.
- We will not allow our decision-making to be influenced in an inadmissible manner by personal interests.
- We will avoid situations in which our interests conflict with those of DACHSER.

2.4 Adherence to basic principles of domestic and international trade

As business partners of DACHSER:

- We will adhere to regulations and legislation governing the import and export of goods, products and services.
- We expressly confirm that we are familiar with all applicable statutory obligations – in particular, those pertaining to foreign trade and customs as well as any economic sanctions placed on persons, countries or goods – and that we will abide by them fully and without restriction.

2.5 Creating and maintaining safe and fair working conditions

As business partners of DACHSER:

- We will uphold the regulatory provisions for fair working conditions, including those stipulating fair compensation and reasonable working hours.
- We condemn any form of forced or child labor.
- We will provide our employees with a safe place of work in accordance with international standards.
- We will use objective, reasonable and comprehensible criteria in dealing with our employees and job applicants. As business partners of DACHSER, we guarantee a working environment for our employees in which discrimination or harassment on grounds of race, ethnic background, gender, religion or worldview, disability, age, or sexual identity will not be tolerated.

2.6 Data protection and information security

As business partners of DACHSER:

- We will observe the applicable rules and regulations governing the collection, retention, processing and transmission of personal data and information.
- We will use any information received from DACHSER solely to perform the tasks accruing to us in providing services to DACHSER, and we will protect such information against unauthorized use by internal and external parties.

2.7 Environmental protection

As business partners of DACHSER:

- We commit to conserving natural resources.
- We will avoid any endangerment of persons and or the environment.
- We will adhere to all applicable environmental protection regulations as a matter of course.

2.8 Subcontractors and third parties

As business partners of DACHSER:

- We will communicate the principles set forth in this Code of Conduct to any third parties whose services are needed for us to fulfill our obligations to DACHSER, and we will demand their adherence to these principles.

3. Monitoring

DACHSER reserves the right to verify (itself or using the services of a third party) that the principles set forth in this Code of Conduct are complied with and implemented in the organizations of its business partners. DACHSER will coordinate this process with its business partner in advance.

If the results of such an audit indicate noncompliance with this Code of Conduct, then its business partner is obligated to correct any transgressions without delay.

If no such correction is carried out within a reasonable period, then DACHSER's business partner should expect the cooperation to end.

If DACHSER's business partner should come to be of the opinion that the principles in this Code of Conduct ought not to be observed in its cooperation with DACHSER, then they are free to communicate this via the following channel: *compliance.office@dachser.com*

By signing, DACHSER's business partner confirms having received the Code of Conduct for Business Partners and agrees to comply with the principles set forth herein.

place, date

Stamp, signature

(No signature is necessary if this Code of Conduct for Business Partners is appended to a separate contract.)