



CODE OF CONDUCT
for business partners

Reaching more.

PREAMBEL

The Rudolph Logistics Group develops and implements comprehensive and customised logistics solutions for various industries. As an owner-managed company in its fourth generation, sustainable, economic conduct and the assumption of economic, ecological, social, civil and criminal responsibility are just as much a part of our self-image as compliance with applicable laws and regulations as well as globally valid standards. Our Compliance Guideline obliges our employees to firmly anchor responsible action and integrity in our corporate culture.

We also have this expectation of our business partners. Hence, for a lasting and sustainable relationship, we expect our business partners to comply with all applicable laws as well as the principles set out in this Code of Conduct. In addition, business partners must make an appropriate effort to ensure compliance with the requirements by their business partners and along the supply chain.

The Code of Conduct is based on national and international requirements and conventions and is based, among other things, on the German Supply Chain Sourcing Obligations Act (LkSG).

Compliance with the requirements is considered the basis for a successful business relationship between the Rudolph Logistics Group and its business partners.



1. Principle of action

Business partners respect the dignity of all people and uphold internationally recognised human rights based on the following internationally applicable standards and guidelines

- Universal Declaration of Human Rights of the United Nations (UN)
- The United Nations Guiding Principles on Business and Human Rights (UNGPR)
- The conventions and recommendations of the International Labour Organisation (ILO) on labour and social standards
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

as the highest maxim of all conduct.

2. Compliance with laws and quality standards

International and national laws as well as binding requirements of the countries in which the Rudolph Logistik Gruppe operates must be observed by business partners in their entirety. Legal violations shall not be tolerated under any circumstances.

Business partners must meet the quality standards of the Rudolph Logistics Group.

3. Social responsibility

Working conditions

Business partners comply with all applicable legal requirements regarding working hours as well as remuneration. The closure of employment relationships is based exclusively on valid employment contracts. The payment of social security contributions, of wages and salaries as well as the contractually agreed fringe benefits shall be made in full and on time. All applicable regulations regarding working hours, overtime as well as holidays are complied with. The payment of wages and salaries and overtime shall be at least equal to the statutory minimum wage. The workplaces are clean and there is no health hazard.

Prohibition of discrimination and equal opportunities

Business partners comply with the rules of equality and the prohibition of discrimination. Discrimination on the basis of gender, origin, race, skin colour, religion, age, disability, sexual orientation or other factors is not permitted in any form. A non-discriminatory work culture characterised by mutual respect and trust is promoted. The provisions of the General Equal Treatment Act (AGG) are observed in all phases of the employment relationship. Hiring of staff and promotions are decided on the basis of personal qualifications.

Forced labour and child labour

Business partners are to reject all forms of forced labour, human trafficking and child labour. Every worker shall perform the

work voluntarily and not under threat of punishment. Business partners shall strictly comply with applicable laws and regulations regarding the minimum age for taking up employment or work.

Freedom of association and collective bargaining

Business partners shall support the right of workers or their respective organisations to negotiate and conclude collective agreements at the appropriate levels and, in the event of conflicts of interest, to take collective action to defend their interests, including strike action. Workers may not be discriminated against on the basis of forming, joining or being a member of such an organisation.

Occupational safety and health

Business partners comply with all applicable occupational health and safety laws and regulations. Appropriate occupational safety systems are in place to take necessary precautions against health hazards and accidents.

4. Environment and sustainability

Business partners comply with all national and international laws and regulations on the protection of the environment. The careful use of resources and the minimisation of pollution and waste are essential for responsible conduct. Hazardous substances are properly labelled, used and disposed of. Business partners are expected to identify and minimise potential environmental risks through an efficient system.

5. Handling property, resources and information of the Rudolph Logistics Group

Use of property

The employees of the business partners handle the property of the Rudolph Logistics Group with care and take measures to prevent theft, loss, misuse or unauthorised use.

Subcontractor drivers always follow the general driver's handbook.

Data protection

Business partners process personal data in compliance with the General Data Protection Regulation (GDPR). Furthermore, it strictly complies with all applicable laws and regulations on data protection and information security and, in particular, protects the personal data of customers, suppliers and employees.

Protection of business information

Business partners shall strictly maintain the confidentiality of information of the Rudolph Logistics Group. This shall include financial or pricing data as well as company strategies, for example. Furthermore, the direct or indirect use of confidential business information, such as customer data, for the personal benefit of an employee or third party is prohibited. These con-

Confidentiality obligations do not end with the termination of the employment relationship.

Plagiarism and intellectual property

Intellectual property may be protected by patent or trademark rights, copyrights and trade secrets. Protected property may not be used or passed on to third parties without the owner's authorisation. Business partners respect intellectual property.

6. Dealing with business partners, third parties and government agencies

Relations with business partners and competitors

The Rudolph Logistics Group is committed to open markets and fair competition and undertakes to comply with cartel law regulations. Business partners must therefore behave ethically, honestly and fairly. All practices which may serve to restrict or prevent competition are excluded.

Bribery and corruption

Business partners act honestly, fairly and transparently. We classify as corruption any behaviour in which a person abuses the power or position of trust entrusted to him or her to gain advantages for himself or herself or a third party. In relations with domestic and foreign, public or political officials, representatives of organisations or the private sector, business partners

and their employees are prohibited from offering, promising, providing or receiving anything of value or financial benefits. This includes offering or receiving gifts, entertainment and services when it can be reasonably expected to influence business conduct or transactions. This explicitly prohibits extortion, bribery or acceleration figures.

International trade bans and boycotts

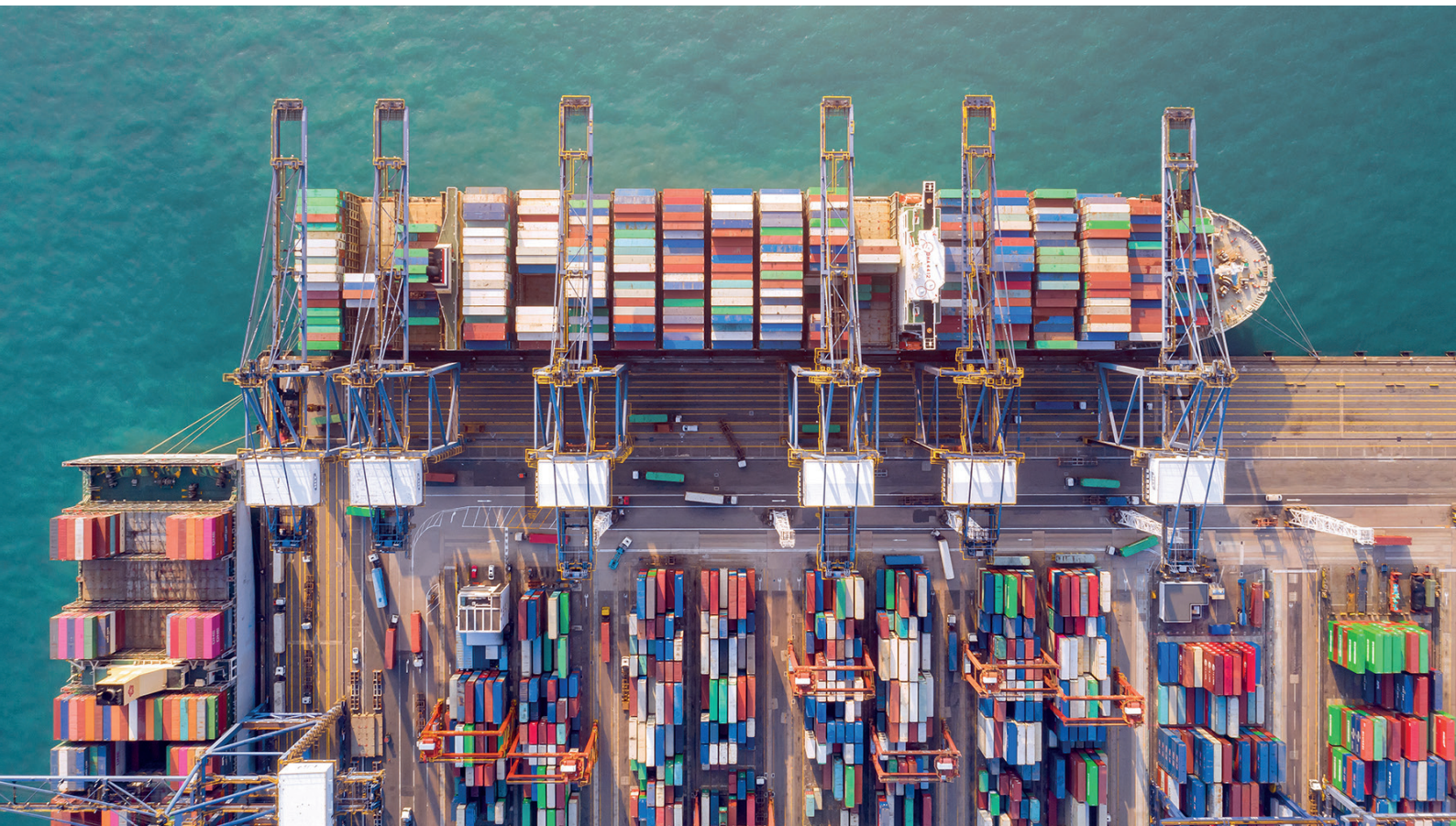
Compliance with national and international trade and boycott regulations for exports, imports, transports and currencies is expected from business partners and their employees.

7. Conflicts of interests

Business partners and their employees must inform the Rudolph Logistics Group if a situation leads or could lead to a conflict of interest.

8. Complaints procedure and whistleblowing system

Business partners are required to have an effective complaints procedure in place. The use of the whistleblowing system must be carried out in a confidential manner and be accessible to all employees. This gives employees the opportunity to report unlawful behaviour and voice complaints without fear of being discriminated against.



Any person who wishes to report a breach of the Code of Conduct or a suspected breach of the law may submit the report to the Rudolph Logistics Group by emailing compliance@rudolph-log.com.

It is within the discretion of Rudolph Logistics Group to forego such consequences and to take alternative measures in lieu thereof if the business partner credibly assures and can prove that it has immediately initiated countermeasures to prevent future similar violations.

9. Verification of compliance with the requirements by the Rudolph Logistics Group

Rudolph Logistics Group reserves the right to verify compliance with the requirements by appropriate means. This review can be carried out using questionnaires / self-report forms or through the use of experts on site.

Such on-site inspection shall only take place after prior notice and in the presence of representatives of the business partner during regular business hours and in compliance with applicable law, in particular with regard to data protection.

Any identified non-compliance with sustainability requirements in a business partner's supply chain will be assessed by the business partner within a reasonable period of time and remedied on its own responsibility without incurring additional costs for the Rudolph Logistics Group.

10. Legal consequences of violations of the requirements

The Rudolph Logistics Group considers compliance with the requirements formulated in this Code of Conduct to be essential for the respective business relationship. If a business partner does not comply with these requirements, the Rudolph Logistik Gruppe reserves the right to take appropriate legal steps, up to and including termination of the business relationship.

City, Date

Name

Signature
