



COMPLIANCE GUIDELINE

for employees

Reaching more.

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FOREWORD

by the Executive Board

The Rudolph Logistics Group was founded in 1946 under the name J. Rudolph & Söhne OHG as a transport company in Baunatal near Kassel in Hesse. Today, the company is an international logistics service provider with over 5,200 employees at 45 locations in Germany, Europe, the USA and on the Arabian Peninsula. We develop and implement comprehensive and customised logistics solutions for various industries. We focus on the business fields of automotive, system transport, industry and trade. The spectrum of services is centred on contract logistics. Our service portfolio includes production, warehouse and spare parts logistics as well as procurement and distribution logistics. We master both complex and related logistic tasks as well as tasks that are not typical for logistics, such as (pre-) assembly activities along the entire value chain.



Dr. Torsten Rudolph



Edzard Oltmanns



Robert Just



Peter Weide

Our Philosophy

How we serve our customers:

- By implementing **expert**, high-performance logistic solutions. These solutions are the product of a dynamic interplay between our experience, the expertise of our employees, and a deep engagement with our customers.
- By seeking out new approaches with passion and curiosity. We carefully examine existing structures and make what's working well work even better. At the same time, we take a **dynamic** and **creative** approach to innovation – while keeping a careful and pragmatic eye on the overall objectives.
- By viewing each new task as a unique and individual challenge. As an owner-run company, we combine swift and flexible decision-making with openness and integrity in our business practices. And get **exceptional** results.

As an owner-managed company in its fourth generation, sustainable economic practices and the assumption of economic, ecological, social, societal, civil and criminal responsibility are part of our self-image. We have laid down the principles for this in our management manual as well as in this policy declaration. As management, we are committed to continuously developing and improving the effectiveness of the established Integrated Management System through:

- Legal conformity
- Respect for human rights

- Establishing and monitoring the compliance policy and objectives,
- Identification and evaluation of customer, legal and regulatory requirements,
- Provision of the necessary personnel and financial resources
- Performance of management assessments (management reviews)

Due to our international business activities, legal regulations from different countries must be taken into account. In case of conflict with national regulations, the Compliance Officer is to be consulted.

The integrity of the company grows out of the integrity of each individual employee. For this, it is essential that we always and everywhere behave in accordance with the rules. In addition to the legal framework, we would like to use this policy statement to create a guideline that concretely and comprehensibly defines our principles for acting responsibly and with integrity within the Rudolph Logistics Group. Violation of legal and internal requirements will not be tolerated.

Only if all employees regard these principles as a self-evident basis for their daily work, and if we manage to build and maintain the trust of our customers, suppliers and partners in us, can the success of the Rudolph Logistics Group be secured in the long term. Management commits itself and all employees to behave ethically. The stipulations in the Compliance Policy and in this Guideline are to be used as a guideline. Each employee is personally responsible for compliance.

Gudensberg, January 2023

Dr. Torsten Rudolph

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1. Principle of action

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

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

as the highest maxim of all conduct.

2. Quality standards

The success of the Rudolph Logistics Group is inextricably linked to a high standard of service quality. To achieve this, the Rudolph Logistics Group has developed and implemented an Integrated Management System (IMS). It is based on the ISO 9001, ISO 14001, ISO 50001, ISO 45001 and VDA 6.2 standards.

The certifications achieved here and their long-term maintenance are mandatory for the provision of our service. All employees undertake to conduct themselves in accordance with the principles, process descriptions, procedural and work instructions and all other applicable documents. We are constantly developing our quality management and looking for new solutions.

3. Lean Management

LEAN management forms a cornerstone of sustainable further development in the company. This is especially true for ourselves and our processes. The focus is on customer and employee satisfaction, quality improvement and alignment with value creation. Regular, personal communication, on-site leadership, training and operational process metrics are the basis for continuous improvement. This makes it possible to support the high quality standards to which we are committed.

4. Compliance with laws

International and national laws as well as binding requirements of the countries in which the Rudolph Logistics Group operates must be observed by all employees in their entirety. Each employee is responsible for knowing and applying the legal requirements that are relevant to his or her area of activity. Legal violations shall not be tolerated under any circumstances. The management of the Rudolph Logistics Group supports the employees in complying with the law. The appropriate and necessary information is provided and regular staff training is conducted.

5. Social and environmental responsibility

The Rudolph Logistics Group has established a risk management system to identify human rights and environmental risks at our sites as well as at our direct suppliers. We assess identified risks based on various factors and take appropriate measures to avoid or minimise the risks. The risk analysis is carried out annually and on an ad hoc basis. In the event of actual indications of risks at our indirect suppliers, we carry out an event-related risk analysis.

Work conditions

The Rudolph Logistics Group is aware of its responsibility as an employer and always fulfils the obligations arising from such. These include in particular:

- Full and timely payment of wages and salaries and contractually agreed fringe benefits
- Payment of wages and salaries comply at least with the conditions of the legally applicable specifications
- Payment of social security contributions
- Conclusion of employment relationships exclusively on the basis of valid employment contracts
- Compliance with all applicable regulations regarding working hours and holidays
- Workplaces that are clean and do not pose a health hazard

Non-discrimination and equal opportunities

Equality and the prohibition of discrimination is important to us.

- We promote a non-discriminatory work culture characterised by mutual respect and trust.
- We promote diversity, equality and inclusion for an open corporate culture and are committed to the individuality of each person. We comply with the provisions of the General Equal Treatment Act (AGG) in all phases of the employment relationship.
- We protect and respect the rights of minorities and indigenous people.
- When hiring employees and promoting them, we make decisions on the basis of personal qualifications. Discrimination on the basis of gender, race or other factors is prohibited.

Forced labour and child labour

We reject all forms of forced labour and human trafficking. Every worker shall perform the work voluntarily and not under threat of punishment.

We condemn child labour and strictly comply with applicable laws and regulations concerning the minimum age for admission

to employment or work.

Freedom of association and collective bargaining

The company supports the right of workers or their respective organisations to negotiate and conclude collective agreements at the appropriate levels and to take collective action to defend their interests, including strikes, in the event of conflicts of interest.

Commissioning of security forces

Where we engage security forces, whether private or public, we will ensure that they are carefully selected, trained and supervised and that they respect the rights and standards set out in this Code of Conduct.

Prohibition of unlawful evictions

We respect the prohibition of unlawful forced evictions and the unlawful taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person.

Environment, sustainability, health and safety

The Rudolph Logistics Group gives high priority to the protection of the environment and the health and safety of all employees. This is expressed in our environmental management system, which is certified according to ISO 14001 at selected locations. Environmental aspect identification and subsequent environ-

mental status analysis are an essential part of our environmental management system. Within the status analysis, we consider the following factors in particular: Water, soil, air, climate and resource availability. The responsibilities for implementation lie with the respective locations. We list waste and hazardous substances in cadastres in accordance with the statutory regulations at our sites with a direct influence on disposal in order to classify, test and dispose of them properly.

In addition, the established rules from the area of occupational health and safety take effect. Certification to ISO 45001 is also in place at some sites. All laws, regulations and guidelines on environmental protection and occupational safety must be complied with. In addition to the specialists or representatives employed, every employee is jointly responsible for making his or her contribution to the protection of people and the environment. Likewise, the Rudolph Logistics Group is committed to sustainable, resource-conserving and environmentally compatible services.

6. Respectful interaction with and between employees

- We support an exchange of views between staff and management.
- We treat others with respect, even if we disagree.
- We deal openly with criticism.



- We act appropriately, carefully and reliably.
- We do not tolerate undesirable behaviour towards colleagues or violence in the workplace. This includes threats, harassment, intimidation or similar behaviour.
- The purchase, sale, use, transfer, possession and consumption of drugs is prohibited on company premises and during working hours.
- The consumption of alcohol is prohibited on company premises and during working hours.

7. Dealing with the company's property, resources and information

Use of information technology

All internal regulations governing the use of Rudolph Logistics Group's hardware, the Internet and software at the workplace must be observed and complied with by all employees. Employees are required to protect the Rudolph Logistics Group's networks and to prevent criminal offences and the misuse of equipment or software. This is fully ensured by the extensive specifications of the internal control system of the IT department. Appropriate authorisation and access restrictions are set up, managed, controlled and validated.

Data protection

We protect the personal data and privacy of our employees, customers and all persons who fall within the scope of the GDPR. In addition to the legal requirements, the guidelines on data protection apply to the handling of personal data, as set out in the Data Protection Handbook in its current version. The data protection coordinators are available to answer any questions.

Use of property

Rudolph Logistics Group's employees handle company property with care and take measures to prevent theft, loss, misuse or unauthorised use.

Drivers shall treat the property of the Rudolph Logistics Group with care and always observe the general driver's handbook. These are internal regulations that must be complied with.

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.

The Rudolph Logistics Group respects intellectual property. We do not tolerate infringements of intellectual property rights. We expect our employees to respect the protection of intellectual property in all areas of work.

Protection of business information

An integral part of the continuous improvement process is the permanent further development of the Rudolph Logistics Group and its services. This also requires the protection of trade secrets, confidential information, property and ideas. Each employee must strictly maintain the confidentiality of information internally and towards third parties, for example customers or suppliers 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. Employees must not exploit business opportunities that arise for their own interest. We are always impartial. These confidentiality obligations do not end with the termination of the employment relationship with the Rudolph Logistik Gruppe. This is documented, among other things, by a corresponding confidentiality agreement.

Finances and accounting

Every business activity of the Rudolph Logistics Group must be properly authorised and fully and accurately accounted for in the books and records in accordance with applicable accounting principles (GoB). False or misleading entries in the books, records and any official applications are not permitted. This is ensured by the internal control system (ICS), which is reviewed annually by an auditing company and confirmed in an attestation regarding its effectiveness.

8. 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. Employees shall conduct themselves ethically, honestly and fairly. All practices which may serve to restrict or prevent competition are excluded. Employees must take care not to disclose any information, especially in contact with the competition, that has to do with corporate strategy, market behaviour or the service portfolio (unless publicly available).

Bribery and corruption

The Rudolph Logistics Group acts 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, our employees are prohibited from offering, promising, providing or receiving anything of value or financial benefit. This includes offering or receiving gifts, entertainment and services when it can be reasonably expected to influence business conduct or transactions. Rudolph Logistics Group's employees may accept gifts with a value of up to € 35 per gift twice a year as long as it does not affect business. Gifts up to a value of € 50 must be agreed with the superior and may only be accepted once a year. Monetary gifts are excluded from this and are generally not permitted. The common hospitality in business transactions remains unaffected. All employees take care not to become dependent on customers or suppliers. This means that extortion, bribery or acceleration rates are expressly prohibited!

Insider information and trading

We understand insider information to be all information that is not publicly known and that can have a significant influence on the price development of a security. These include, among others, major orders or research successes of a company, but also financial results such as unexpected profit declines or insolvency applications. This insider information must be treated as strictly confidential by all employees. Employees are prohibited from trading in shares or other securities affected by such inside information until such inside information has been made public. The provisions of Section 14 of the German Securities Trading Act (WpHG) are applicable to the handling of this information within the Rudolph Logistics Group.

International trade bans and boycotts

The employees of the Rudolph Logistics Group respect national and international trade and boycott regulations for exports, imports, transports and currencies.

9. Conflicts of interests

Any conflict of interest that could arise from their own personal, family or financial activities colliding with the objectives of the Rudolph Logistics Group shall be avoided by the employees. If an employee plans to take up secondary employment that is likely to cause a conflict of interest, such as consultancy contracts, he or she must contact the Compliance Officer.

10. Measures for implementation

With this policy declaration, we commit ourselves to complying with due diligence obligations and assume responsibility. Accordingly, we have adapted our processes. In the event of a breach, we will take reasonable steps to minimise or prevent the breach. All measures are reviewed for their effectiveness. Local implementation of the policy declaration is the responsibility of those responsible for the respective site.

We sensitise our employees by means of training to comply with human rights and environmental due diligence obligations as well as our compliance guideline.

With our Code of Conduct for Business Partners, we address our expectations and also pass on responsibility to our business



partners. We monitor our business partners' compliance with the Code of Conduct through appropriate auditing measures and take action if there is a breach.

Compliance with due diligence requirements is regularly documented and reported to the management on an annual and ad hoc basis. The annual report is published on our homepage.

11. Whistleblowing system and complaints

Every employee of the Rudolph Logistics Group is subject to a duty to report:

- Criminal conduct
- Violations of the Compliance Guideline or other internal company policies
- Unethical and inappropriate behaviour
- Violations of legal regulations
- Fraud or wilful misconduct
- Other situations that involve negative consequences for the employees or the company

Information can be reported by telephone, in person or by using the whistleblower form via email to the Compliance Officer or the supervisor. The corresponding procedural instruction on the whistleblower system must be complied with.

If the supervisor receives a tip-off, he or she must immediately inform the Compliance Officer. The reports will be treated confidentially. Adverse measures based on the reporting of a violation are prohibited. If a tip-off is made with malicious intent against an individual, this will result in disciplinary action being taken against that individual.

In addition, the Federal Office of Justice has set up an external reporting office to which information can be reported.

The employees are asked to give priority to reporting to the internal reporting office, so that it is ensured that the report is effectively addressed.

12. Expectations of the employees

The company expects its employees to contribute to the Rudolph Logistics Group to the best of their ability and skills. The reputation of a company arises from the behaviour of the people who are employed there. Therefore, it is even more important that the company's policy is in line with the behaviour of its employees. This Compliance Guideline defines a code of conduct to which all employees must adhere and which applies directly to all employees. Supervisors are to act as role models. In the event of violations of the Compliance Guideline, the employee may be subject to disciplinary measures and sanctions under labour law, up to and including termination of employment.

If you have any questions about the Compliance Guideline or

need assistance in interpreting or applying the Code of Conduct, please contact your supervisor or the Compliance Officer.

Contact information for Compliance Officer

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