



people in logistics

HÖDLMAYR
INTERNATIONAL



Code of Conduct

Table of contents

1. Introduction and objectives	2
2. Area of application	2
3. Compliance and responsibility for implementation	3
3.1. General	3
3.2. Group Compliance Officer	3
4. Compliance rules in detail	4
4.1. Compliance with laws and other regulations	4
4.2. Fair competition, ban on cartels.....	4
4.3. Corruption and Bribery.....	5
4.4. International transport regulations & embargoes, trade controls and sanctions	6
4.5. Money laundering	6
4.6. Compliance with human rights and prohibition of discrimination.....	7
4.7. Conflicts of interest	8
4.8. Dealing with company information/intellectual property....	8
4.9. Working hours and remuneration.....	9
4.10. Occupational safety.....	9
4.11. Climate and environment.....	9
4.12. Data protection	10
4.13. Dealing with authorities.....	10
4.14. Social Media and artificial intelligence.....	10
4.15. Sponsoring and donations.....	11
5. Reporting of misconduct (Whistleblower System)	12
6. Final provisions	13

1. Introduction and objectives

The Hödlmayr Group offers its services internationally and is represented with its companies at locations in over 16 countries. Its activities are subject to a wide range of country-specific and international legal regulations.

That is why the business activities of Hödlmayr International GmbH and its subsidiaries are characterized by responsible and sustainable action in accordance with the highest ethical principles. Ultimately, this is essential in order to maintain the trust that our customers, business partners and employees have placed in us over the decades.

Therefore, this Code of Conduct forms the basis for morally, ethically and legally impeccable conduct throughout the Group and is intended to support our employees in the responsible performance of their functions.

The Board of Directors (BOD), and each individual employee of the Group are clearly committed to complying with the principles described in this Code of Conduct.

2. Area of application

In addition to the other internal guidelines (Group guidelines, circulars, etc.), this Code of Conduct is part of the Hödlmayr Group's Corporate Governance. It therefore applies without restriction to all international employees, including members of the Board of Directors (BOD), General Managers and other leaders (hereinafter referred to as "employees") of the Hödlmayr Group.

It is in the interest of the Hödlmayr Group that morally, ethically and legally impeccable conduct is demanded not only from its own employees, but also from the Hödlmayr Group's global customers, suppliers of goods and services, business intermediaries, consultants and other business partners (hereinafter referred to as "business partners"). For this reason, the employees of the Hödlmayr Group must work to ensure that business partners also accept and comply with this Code of Conduct. The Code of Conduct therefore also applies in full to all business partners.

3. Compliance and responsibility for implementation

3.1 General

All employees of the Hödlmayr Group are obliged to strictly adhere to the provisions of this Code of Conduct. The ultimate responsibility for compliance and implementation at the individual Hödlmayr subsidiaries lies with the General Managers. The management team should be a role model for employees in this regard. In interpreting this Code of Conduct, employees must also be guided by "common sense" and question whether on the basis of reasonable ethical and moral standards, a specific course of action could give rise to criticism. Above all, the country-specific standards and habits must be taken into account. Where statutory regulations exist, there is no scope for discretion.

3.2. Group Compliance Officer

To ensure that the Hödlmayr Group complies with all relevant legal requirements globally, minimizes risks and promotes a culture of integrity and ethical responsibility, the Board of Directors has appointed a Group Compliance Officer.

The Group Compliance Officer is responsible for

- supporting and advising the Board of Directors in the area of Compliance as part of Corporate Governance
- control and monitoring of the Hödlmayr Group's compliance management system, including reporting to the Board of Directors
- training and raising awareness of Compliance issues among all employees
- advising employees on Compliance issues
- Development of policies and procedures and management of existing compliance guidelines
- the Hödlmayr whistleblower system
- internal investigations of Compliance violations within the Hödlmayr Group

4. Compliance rules in detail

4.1. Compliance with laws and other regulations

The applicable laws and other external and internal Group regulations and guidelines must be strictly observed in all business activities and decisions. All employees are required to obtain comprehensive information about the laws, other regulations and internal guidelines and rules applicable to their respective area of responsibility and to contact the responsible bodies (direct line managers, Group Compliance Officer) in cases of doubt.

4.2. Fair competition, ban on cartels

Transparent and fair conduct on the market safeguards the interests of both the individual Group companies and the employees as well as the competitiveness of the Hödlmayr Group as a whole in the long term. Any restriction of free competition and violations of competition and antitrust regulations are incompatible with the corporate philosophy and culture as well as the self-image of the Hödlmayr Group.

Within the scope of business activities, all employees must comply with the following rules in particular:

- Misleading advertising or misleading statements about products or services.
- No unfair business practices may be used or pressure exerted on business partners to sell products at a certain price.
- No agreements or arrangements may be made with competitors on prices, the allocation of customers, regions or markets or on capacities or supply and offer conditions.

4.3. Corruption and Bribery

The Hödlmayr Group fully complies with the relevant national and international anti-corruption regulations (e.g. UNCAC, U.S. Foreign Corrupt Practices Act, UK Bribery Act) and is therefore clearly opposed to any form of corruption and bribery.

All employees are therefore instructed not to accept or grant/offer any gifts, invitations, or other benefits or favors from business partners, customers or other persons, with the exception of those that are socially appropriate and common for the respective country or culture and whose acceptance and value cannot reasonably be expected to influence operational decisions or actions.

With regard to the offering/granting or acceptance of advantages to or by public officials and persons with a political background, however, an amount of EUR 100.00 per person and quarter may not be exceeded.

Accepting or giving/offering cash is generally not permitted.

The acceptance or granting of invitations that include the participation of family members and/or travel and accommodation costs is not permitted without prior check by the Group Compliance Officer and approval by the responsible member of the BOD.

In case of doubt regarding the appropriateness of gifts, invitations, etc., the direct superior or the Group Compliance Officer must always be consulted.

4.4 International transport regulations & embargoes, trade controls and sanctions

International transportation operations are the most important part of the business strategy for all Hödlmayr Group locations. For this reason, it is essential for all Group companies and all employees to act in accordance with and in compliance with relevant international transport, trade control, embargo and sanction regulations. To ensure this, employees take the necessary precautions in each case to prevent violations of these regulations and requirements.

4.5. Money laundering

Various countries, including the countries of the European Union, have enacted laws against money laundering. All employees are prohibited from taking measures that violate money laundering regulations, either alone or in collaboration with third parties. Money laundering is defined in particular as the smuggling (e.g. through exchange or transfer) of funds or other assets derived from criminal acts into the legal financial and economic cycle.

4.6. Compliance with human rights and prohibition of discrimination

The Hödlmayr Group respects internationally recognized human rights and is guided in its actions by the United Nations Guiding Principles on Business and Human Rights. Particular importance is attached to the rights of the International Bill of Human Rights, the core labor standards of the International Labor Organization (ILO) and the European supply chain laws (German "LKSG" and the other "ESG" legislations in force). The Hödlmayr Group is also committed to equal opportunities and gender equality in general.

The Hödlmayr Group rejects all forms of human rights violations, such as all forms of slavery, slavery-like practices, servitude or other forms of domination, forced labor, the employment of a child under the age at which compulsory education ends according to the law of the place of employment, work that is harmful to the health, safety or morals of children, human trafficking, threats to persons defending human rights and other violations of human rights. In addition, the Hödlmayr Group attaches particular importance to the protection of fundamental rights at work. Furthermore, discriminatory behavior such as on the basis of age, disability, origin, gender, political stance or trade union activity, race, minorities (e.g. indigenous peoples), religion or sexual orientation is just as little tolerated as sexual harassment in any form (for example through advances, degrading comments, jokes, foul language, suggestive gestures, etc.).

The same level of rejection of violations of human rights and discrimination is also demanded of the Hödlmayr Group's customers, business partners and supply chains. The Hödlmayr Group therefore only enters into a business relationship with those companies that are just as strictly opposed to discrimination and always ensure compliance with human rights.

4.7. Conflicts of interest

In the course of business activities, it is possible that employees may find themselves in situations in which their personal or economic interests conflict or may conflict with the interests of the Group. All employees are expected to deal transparently with such conflicts of interest. All employees are obliged to immediately and fully disclose any actual or potential conflicts of interest to their line manager without being asked to do so and, if necessary, to request special approval. In particular, conflicts of interest may arise in connection with secondary employment (including participation in supervisory or advisory boards). Economic involvement with competitors or business partners of the Hödlmayr Group - in particular with customers or suppliers - is not permitted. Conflicts of interest can also arise from family relationships between employees who work in the same department. Such family relationships must therefore be disclosed to the line manager.

4.8. Dealing with company information/intellectual property

Confidential information of any kind that is obtained in the course of professional activities, including information outside of one's own area of activity, may neither be used to pursue one's own interests nor made accessible for the use of the interests of third parties. It must be ensured that company information of any kind is always stored securely. If such information has to be taken outside the company for business reasons, it must be secured against inspection or access by third parties. Strict confidentiality must be maintained with regard to all company and business secrets as well as topics relevant to the Group and the company. Information from which trade and business secrets can be derived must also be treated confidentially. The obligation to maintain confidentiality also applies after termination of the employment relationship. In addition, the relevant confidentiality provisions of the respective employment contracts shall apply. Hödlmayr employees shall protect all intellectual property of their own company, its customers, third parties and individuals.

4.9. Working hours and remuneration

The applicable local laws for the determination of and compliance with working hours (including overtime), scheduled days off and paid annual leave must be strictly adhered to. This also applies to compliance with legal requirements regarding wages and salaries, overtime regulations, wage deductions, performance-related pay and other remuneration.

4.10. Occupational safety

Occupational safety and health management are of particular importance. High technical and operational safety standards are the basis for our work. The aim is to prevent accidents at work and work-related illnesses. To achieve this, we rely on the cooperation of our employees. The applicable occupational health and safety regulations must be complied with without exception. Sources of danger must be identified immediately and appropriate preventive measures taken. Managers are important role models in this respect. If you receive instructions from your line manager that do not comply with the quality and safety standards, this must be reported to the possible contact points at the end of this Code of Conduct.

4.11. Climate and Environment

Hödlmayr is fully committed to the legal requirements concerning climate and environmental protection. The Hödlmayr Group's sustainability strategy takes into account the interests of all relevant stakeholders, with whom a continuous dialog takes place. The accountability and reporting obligations in environmental matters are proactively pursued. The measures for environmentally friendly and energy-efficient design encompass the Hödlmayr Group's entire range of services and products.

4.12. Data protection

The protection of customer-related data is just as important as the protection of employee and business partner data. The Hödlmayr Group is committed to complying with all laws regarding the protection of personal data. In particular, the Hödlmayr Group attaches great importance to strict compliance with the EU General Data Protection Regulation as amended (EU GDPR). Personal data is only collected, processed or used if this is permitted by law or if the data subject agrees to this.

4.13. Dealing with authorities

Cooperation with international authorities is characterized by mutual trust and appreciation. The Hödlmayr Group therefore always strives for a cooperative and transparent relationship with all competent authorities and other sovereign bodies.

4.14. Social media and artificial intelligence

The internet, social media channels (e.g. Facebook, Instagram, WhatsApp, LinkedIn) and artificial intelligence (e.g. ChatGPT) are innovative communication media. They serve as a source of information, work support and the exchange of ideas between people. As an international company, the Hödlmayr Group appreciates the advantages of these media and also uses them for (professional) communication and information exchange.

In this context, however, the Hödlmayr Group does not tolerate the exchange or dissemination of indiscreet, offensive, discriminatory, violence-glorifying, sexual, racist or right-wing extremist ideas - in any way whatsoever - by our employees, customers and business partners.

Furthermore, when using these media - in whatever form - it must always be ensured that company-related data, business and trade secrets, personal rights of third parties such as data protection (GDPR), copyrights or license rights are not violated.

The applicable Hödlmayr Cyber Security Guidelines must also be always observed and complied with.

4.15 Sponsoring and donations

Before concluding a sponsorship agreement, it must be verified that the nature of the event is compatible with the Hödlmayr Group's brand image and that the value of the sponsorship is in line with external standards. Furthermore, it must be ensured that the sponsorship does not violate any provisions of this Code of Conduct. Every sponsorship agreement must also be reported to the Group Compliance Officer.

Events that are organized by political parties or state/local authorities and which are dominated by a political nature are generally not sponsored. Exceptions must always be reviewed by the Group Compliance Officer and approved by the responsible member of the BOD.

With regard to donations in cash or in kind, no donations may be made to individuals who are politically active, to political parties or to organizations that are closely linked to political parties.

In all other cases EUR 400.00 per donation per quarter is approved by the BOD. Amounts more than this must be reviewed by the Group Compliance Officer and approved by the responsible member of the BOD.

5. Reporting of misconduct (Whistleblower System)

It may happen that employees of the Hödlmayr Group discover violations of the Code of Conduct, other internal guidelines and regulations or statutory provisions. If employees become aware of such misconduct, they are obliged to report it immediately.

The following options are available for this purpose:

- Information to the direct superior
- Information to the management of the respective Group company
- Information to the Group Compliance Officer by e-mail [\(\[hia.ccm@hoedlmayr.com\]\(mailto:hia.ccm@hoedlmayr.com\)\)](mailto:hia.ccm@hoedlmayr.com) or
- anonymously via the Hödlmayr Group's whistleblower portal [\(<https://www.hoedlmayr.com/hinweisgeber>\)](https://www.hoedlmayr.com/hinweisgeber)

All reports received will be carefully investigated, may be made anonymously, and will be treated confidentially. In order to promote open and trusting communication, it is expressly stated that employees who report identified violations of laws, the Code of Conduct or other internal guidelines and regulations will not suffer any negative consequences whatsoever as a result. This also applies to other persons who contribute important information to the investigation of such misconduct. However, Hödlmayr expressly reserves the right to take disciplinary action against employees who intentionally or through gross negligence make false accusations.

6. Final provisions:

All employees are responsible for implementing and complying with the regulations described above. The Code of Conduct is part of the employment contract. Any breach of the Code of Conduct automatically constitutes a breach of the employment contract.

If violations become known, they can therefore be consistently sanctioned (e.g. termination, dismissal, criminal prosecution, civil liability, etc.).

(General) Managers must fulfill their special role model function and bear special responsibility for communicating, implementing and enforcing this Code of Conduct. In doing so, emphasis must be placed on the national language (translation of the Code of Conduct) and the comprehensive accessibility of the Code of Conduct for all employees. In particular, employees who are new to the company must be given rapid access to this Code of Conduct.