

people in logistics

HÖDLMAYR
INTERNATIONAL 

Code of Conduct

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1. Introduction and Objectives

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

Violations of these framework conditions, especially those against the legal system of a country, can cause considerable financial disadvantages for the company and permanently damage the Group's reputation.

The business activities of Hödlmayr International AG and its subsidiaries are characterised by responsible action and the highest ethical principles. In order to continue on our successful course, we must maintain the trust placed in us by our customers, business partners and employees. Violations of the law, on the other hand, lead to serious disadvantages for the company, for example in the form of administrative fines or possible claims for damages. In addition, there is the possibility of reputational damage, which would considerably weaken the Hödlmayr Group as a specialist in vehicle logistics. In many cases, even the mere appearance of a violation of the law can have an unfavourable impact on public attitudes and the attitude of customers, shareholders or business partners.

By complying with applicable legal provisions, each employee acts in the corporate interest of the Hödlmayr Group. Legal prohibitions and obligations must be observed, even if this may appear to be inappropriate or economically unfavourable from the point of view of the individual or the company. In case of doubt, lawful action always takes precedence. Every employee can rely on this principle. It applies even in the case of contradictory instructions from a manager.

This Code of Conduct contains all the requirements for those central topics in which conduct in compliance with the rules is expected. It also describes how to deal with violations. The Code of Conduct set out here forms the basis for morally, ethically and legally impeccable behaviour throughout the Group and is intended to support our employees in the responsible performance of their functions. We, the Board of Directors, as well as each individual employee of the Group are clearly committed to adhering to the principles described in the Code of Conduct.

2. Scope of application

The Code of Conduct applies to all managers and employees of the Hödlmayr Group without exception. In the event of additional business or country-specific requirements, local compliance programmes may supplement it. Furthermore, it is in the interest of the Group that the Group companies also bring the Code of Conduct to the attention of their key business partners (customers, suppliers, consultants, etc.). In any case, we require our business partners to behave with integrity and in compliance with the law in the context of our business relationships.

3. Compliance and implementation responsibility

3.1. General

In principle, each individual employee is responsible for compliance with and implementation of the Code of Conduct. Managers should set an example for their employees in this regard. When interpreting the Code of Conduct, employees must also be guided by "common sense" and question whether, based on reasonable ethical and moral standards, a specific course of action could give rise to criticism. In this context, country-specific standards and practices must be taken into account. In the case of legal regulations, there is no discretionary power.

All employees are required to report verifiable or suspected violations of laws, the Code of Conduct or other internal guidelines and regulations (see chapter 5 "Reporting misconduct").

3.2. Compliance Officer

The board of directors is responsible for ensuring the establishment, maintenance, evaluation and improvement of the compliance management system. Furthermore, the board of directors must define the internal responsibilities and powers and appoint a compliance officer.

The Compliance Officer is responsible for:

- the administration of the Code of Conduct as well as related guidelines (updating)
- answering questions of interpretation
- reporting to the Board of Directors
- Communicating and training employees on the Code of Conduct.

In addition to the direct supervisors, the Compliance Officer is the contact person for all employees if decision-making aids are needed for the correct procedure in certain situations.

In addition, indications of violations of rules can be reported via the e-mail address hia.ccm@hoedlmayr.com. This is possible by stating the name and also anonymously. This is possible by stating the name and also anonymously. A serious breach of the rules occurs when the basic ethical values laid down in this Code of Conduct are substantially violated. Likewise, violations of the law or rules that could seriously damage the reputation or other interests of the company are serious violations of the rules.

1. Code of Conduct

4.1. Compliance with laws and other regulations

In all business actions and decisions, the applicable laws and other external and Group-internal regulations must be strictly observed. All employees are required to inform themselves comprehensively about the laws, other regulations and internal guidelines and rules applicable to their respective areas of responsibility and, in cases of doubt, to contact the responsible bodies (direct supervisors, compliance officers).

Example:

An instruction from a supervisor is not a justification to violate laws and our policies. Report such practices to the contact points at the end of this Code of Conduct.

You can avoid unpleasant situations in advance if you deal with the following questions in your everyday professional life:

- Are my actions legal and do they comply with the guidelines of the Hödlmayr Group?
- Can I in good conscience take responsibility for my actions or what would others say about them?
- How would I react if my behaviour were made public?

4.2. Fair Competition

Transparent and fair conduct on the market sustainably safeguards the interests of both the individual Group companies and the employees as well as the competitiveness of the Hödlmayr Group as a whole. Restrictions of free competition and violations of competition and anti-trust regulations are not compatible with the corporate philosophy and culture as well as the self-image of the Hödlmayr Group.

In the course of their business activities, all employees must comply with the following rules of conduct in particular:

- No unfair business practices may be used or pressure exerted on business partners to distribute products at a certain price.
- No agreements or arrangements may be made to submit sham offers.
- Hödlmayr Group employees are prohibited from discussing confidential matters such as prices and terms of sale, costs or similar confidential information in discussions and contacts with competitors.

Example:

You are at an economic event and talk to an employee of a competitor. In the course of this conversation you notice that he would like to make an agreement with you regarding pricing in tenders.

Make it clear to your interlocutor that you are not interested in such unfair business practices. Subsequently, inform your superior.

4.3. Money laundering

Various countries, including the countries of the European Union, have enacted laws against money laundering. All employees are prohibited from taking actions, either alone or in conjunction with third parties, that violate money

laundering regulations. Money laundering is understood to mean, in particular, the smuggling (e.g. by exchange or transfer) of funds or other assets originating from criminal offences into the legal financial and economic cycle.

4.4. Compliance with human rights, prohibition of discrimination

The Hödlmayr Group respects internationally recognised human rights and bases its actions on the United Nations Guiding Principles on Business and Human Rights. Particular importance is attached to the rights of the International Bill of Human Rights and the core labour standards of the International Labour Organisation (ILO). The Hödlmayr Group rejects any kind of discrimination in employment and occupation, such as slavery, child labour, servitude, forced labour, human trafficking, threats to persons defending human rights and other violations of human rights. Furthermore, the Hödlmayr Group attaches particular importance to the protection of fundamental rights at work. Efforts are made to ensure that not only the Hödlmayr Group but also our business partners follow these principles. The Hödlmayr Group takes appropriate measures and assumes responsibility for human rights due diligence in accordance with the United Nations Guiding Principles. The Hödlmayr Group is also committed to this with its declarations of principles for social responsibility and human rights.

Discriminatory behaviour, such as on the basis of age, disabilities, origin, gender, political stance or trade union activity, race, religion or sexual orientation, is just as little tolerated as sexual harassment in any form. These principles also apply to conduct towards external partners.

Example:

A female colleague confides in me during the lunch break that a colleague is always making suggestive gestures towards her and telling tasteless jokes about her in the department. She feels sexually harassed by him.

How should I behave?

Speak to your colleague - assuming the person concerned agrees - that he/she has not behaved respectfully. If the disrespectful behaviour is repeated, contact one of the possible contact points at the end of this Code of Conduct.

Discrimination, in whatever form, will not be tolerated!**4.5. Conflicts of interest**

In the course of business, employees may find themselves in situations where 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 disclose actual or potential conflicts of interest immediately and in full to their respective supervisor 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 of employees who are employed in the same department. Such family relationships must therefore be disclosed to the superior.

Example:

My company is looking to hire an additional employee for scheduling. My son has finished his training and is now looking for a job. I know the head of the scheduling department very well and he also owes me a favour. I recommend my son to him as a new employee.

The purchasing manager meets with several suppliers to negotiate purchasing conditions. Supplier A promises the purchasing manager a purchasing discount

for his next private purchase from him. The purchasing manager does not decide on the supplier with the best conditions, but on supplier A.

How should I behave?

Make sure that your decision is not influenced by your personal advantage. Decisions in your everyday professional life should be made exclusively on the basis of factual and comprehensible criteria.

If conflicts of interest arise, they should be disclosed to your superior without delay.

4.6. Dealing with company information/intellectual property

Confidential information of any kind obtained in the course of professional activities, which includes information outside the scope of one's own activities, may neither be used for the pursuit of 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 kept secure. If such information must be taken outside the company for official 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 company and business secrets can be derived must also be treated confidentially. The obligation to maintain confidentiality shall also apply 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 as well as of third parties and individuals.

4.7. Working time and remuneration

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

4.8. Health and safety at work

The topics of occupational safety and health management occupy a special position. High technical and operational safety standards are the basis for work. The goal is to prevent occupational accidents 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 are to be pointed out immediately and appropriate preventive measures are to be taken. Managers play an important role as role models. If you receive instructions from your superior 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.

4.9. Environmental protection

Hödlmayr is fully committed to the legal requirements and environmental policy goals. The sustainability strategy of the Hödlmayr Group takes into account the interests of all relevant stakeholders, with whom a continuous dialogue takes place. The accountability and reporting obligations in environmental matters are proactively fulfilled. The measures for environmentally compatible and energy-efficient design cover the entire range of services and products of the Hödlmayr Group.

4.10. Data protection

The protection of customer-related data is just as important as the protection of employee and business partner data. Careful handling of this data and compliance with the relevant legal provisions is practised by all managers and employees. In particular, the Hödlmayr Group is committed to compliance with the General Data Protection Regulation (DSGVO) and the associated obligations. Personal data is only collected, processed or used only if this is legally permitted or if the person concerned agrees to it. The data protection officer (certified data protection officer) of the Hödlmayr Group supports the individual departments and branches in this regard.

Example:

The other day, when I wanted to copy some things, I found a list with employee data and information on wages and salaries at the copier. I am worried that someone other than the HR department might have seen this information.

How should I behave?

Only authorised persons may access personal and company data for business purposes! Make sure that sensitive information does not fall into unauthorised hands. Therefore, report your find to the responsible department or your supervisor.

4.11. Dealing with authorities

Cooperation with authorities is characterised by mutual trust and appreciation on the basis of applicable procedural rules. The Hödlmayr Group strives for a cooperative relationship characterised by transparency with all competent authorities and other sovereign bodies. We attach importance to compliance with the legally prescribed procedures in investigations and other official activities.

5. Reporting of misconduct

It may happen that employees of the Hödlmayr Group discover violations of the Code of Conduct, of other internal guidelines and regulations or of legal provisions. If employees identify 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 compliance officer of your branch office
- Information to the management of the respective Group company
- Information to HIAG's Compliance Officer by e-mail (hia.ccm@hoedlmayr.com)

All reports received will be carefully investigated, may be made anonymously and will be treated confidentially if requested. In order to promote open and trustful communication, it is expressly stated that employees who report identified violations of laws, the Code of Conduct or other internal guidelines and regulations will in no way suffer negative consequences of any kind. This applies equally 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 grossly negligently make false allegations