

A black and white photograph of a ship's deck. In the foreground, a large cylindrical metal structure, possibly a propeller or a large pipe, is visible. The deck is made of wooden planks and metal railings. In the background, the ship's superstructure is visible, featuring various levels, ladders, and metal beams. The image has a grainy, high-contrast look.

**Code of  
Conduct**

# Contents

# What we Stand for...

Our Code of Conduct reflects our corporate values "Respect & Results".

The rules and standards outlined here serve as an "ethical compass" that guides our employees worldwide in their day-to-day work. In all business units and regions, the conduct of managers and employees, both toward each other and toward business partners, customers and investors, is characterized by mutual respect.

Respect also means observing applicable legal regulations in all regions and countries in which we operate. For us, there is no alternative to conducting our business in a responsible, fair and ethically irreproachable way. The Code of Conduct is binding for all regions and business units of EzzyShip®

We are aware of our special corporate responsibility toward the environment, society and our employees, and we demonstrate this clearly in our business practices and our daily work.

Overall, our Code of Conduct describes behaviors, beliefs and standards that we aspire to and view as the basis of our established practice. It is an indispensable part of our corporate identity, reflects our corporate values and pays into our customer promise "Excellence. Simply Delivered."

The Board of Management endorses the values outlined in this Code of Conduct and expects all employees, executives and managers to be role models in their daily work and to contribute to a corporate culture characterized by respect.



# Our Code of Conduct

# Our Responsibility

**All employees, executives, managers and Board Members are called on to breathe life into the Code of Conduct and thus contribute to the success of our company:**

- Familiarize yourself with its standards and values and stay up to date, for example by taking part in training sessions.
- Be engaged and report any violations.

**Our executives, in particular, act as role models for integrity and respect. As an executive, you have a special role to play in implementing the Code of Conduct:**

- Create a culture characterized by mutual respect, openness and trust.
- Do everything you can to promote the implementation of the Code of Conduct.
- Ensure that the employees under your supervision comply with the Code of Conduct and be a role model of these values in your daily work.
- Inform and advise your team about the standards and values set out in the Code of Conduct.
- Provide opportunities for others to voice concerns openly and directly

# Our Conduct

**When confronted with a difficult situation, consider these questions:**

1. Is my action or decision legal?
2. Does it comply with the values and standards of EzzyShip and other its other policies?
3. Is it free of personal conflicts of interest?
4. Could my action or decision withstand public review?  
What would it look like in the Media?
5. Will my action or decision protect EzzyShip's reputation as a company with high ethical standards?

If the answer to each question is "yes", your action or decision is most likely correct and compliant with the following principles of conduct. If you are not sure, ask. And keep asking until you are sure! If in doubt, contact your manager, the responsible HR or legal department, or the compliance officer.

Always bear in mind that a violation of our standards may not only cause our company considerable financial damage but can also have a serious impact on our image and lead to a loss of confidence on the part of our customers, employees and shareholders.



# Our Standards of Working Together

# Sustainable Employee engagement

We firmly believe that the motivation and engagement of our employees are an important differentiating factor in our industry and make an essential contribution to our business success. It is for this reason that mutual esteem and respect are part of our shared values. We are committed to fair and open discussions and to dealing constructively with different opinions to ensure that we reliably achieve our common objectives.

## Here is what you can do:

- Use our annual Employee Opinion Survey (EOS) as an invitation and starting point to open dialogue within your teams.
- Promote long-term employee engagement by knowing and understanding the tools and measures relevant to your area so that you can design and implement successful activities in cooperation with employees and managers.
- Foster team spirit and engage for example in Group-wide or local initiatives and events such as Global Volunteer Day

# Our corporate Responsibility Standards

## Human rights

Respect for human rights is a cornerstone of our activities. As a signatory, we are committed to the principles of the United Nations Global Compact. We also respect the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work in accordance with national law and practice. Within our sphere of influence, we respect human rights in accordance with the Universal Declaration of Human Rights and the UN Guidelines on Business and Human Rights. We expressly reject all forms of forced or compulsory labor and child labor. Our employees are free to join or not to join a union or employee representation body of their choice, free from threat or intimidation. We recognize and respect the right to collectively bargain in accordance with applicable law.

## Here is what you can do:

- Speak up if you feel that human rights are not being observed.
- Contact your manager or your HR department.

What is the significance of human rights for a global enterprise?

In today's globally interconnected economy, respect for human rights has become a basic value for all businesses. Our customers, investors and employees all over the world expect us to adopt a clear stance.

In 2006, we committed ourselves to supporting the protection of international human rights as one of the ten principles of the UN Global Compact. Our training courses and workshops help to raise awareness of respect for human rights as a common practice

### **Health and safety at work**

The safety, health and well-being of our employees are top priorities for us, so we place great importance on compliance with our occupational health and safety policies and with legal regulations and industry standards. To promote physical and mental well-being over the long term, we expect our managers to provide for a healthy working environment. At the same time, all employees are likewise called on to take personal responsibility in this regard.

#### **Here is what you can do:**

- Adhere to the existing occupational health and safety policies. They are there to protect you!
- Familiarize yourself with our Safety First Framework, which defines Groupwide standards for occupational health and safety.
- As a manager, ensure that employees can participate in all required health and safety trainings.
- Take advantage of the preventive and precautionary healthcare measures.

How can I get involved in workplace health and safety?

You can participate in various activities in your business unit to prevent workplace accidents and work-related illnesses, or simply learn to give first aid.

### **Environment and Climate protection**

Due to the size of our company and its significance for global commerce, we have a particular responsibility with respect to the environment. Our business activities are primarily guided by our commitment to minimize the impact on the environment and the climate. Our Group-wide environmental and climate protection program is predominantly aimed at preventing and reducing emissions of greenhouse gases and air pollutants. Here too, the following applies: Every single contribution made by our employees helps to reduce our carbon footprint.

### Here is what you can do:

- Train yourself to adopt good environmental habits: Switch off equipment when it's not in use and print only when necessary ("paperless office").
- Arrange video or online conferences more often instead of going on business trips.
- As a buyer, make "greener" purchase decisions.
- Get involved in our environmental and climate protection activities.
- Take the initiative and suggest more environmentally friendly solutions wherever possible.

What contribution to reducing our logistics-related greenhouse gas emissions is a warehouse worker like me expected to make?

Every one of us can make a contribution in our everyday lives. Ensure efficient power consumption when using equipment



# Our Standards for Business Activities

# Working with Suppliers

We are in dialogue with our suppliers around the world and share with them our basic principles of ethical behavior, compliance with legal standards and respect for the environment. We expect them to base their actions on the same principles.

In our Corporate Procurement Policy we commit to buy products and services from suppliers and subcontractors in accordance with our standards, which include our EzzyShip Group Supplier Code of Conduct.

## **Here is what you can do:**

- Refer to our Corporate Procurement Policy and our Supplier Code of Conduct.
- Order in accordance with our Corporate Procurement Policy, including our EzzyShip Group delegation of authority guideline and a clear segregation of duties.
- When selecting suppliers, use standardized processes, which are aligned with the divisional Purchase-to-Pay process owners and Corporate Procurement.

# Accounting and Reporting

The correctness and accuracy of accounting and financial reporting records provide the basis for our decision-making processes. We expect all business transactions in our accounting and reporting systems to be reported in a timely, accurate and complete manner in accordance with established procedures and applicable accounting standards. Documents and reports must contain the necessary information about all transactions and be stored in accordance with corporate guidelines and relevant laws and regulations.

## **Here is what you can do:**

- Observe our accounting-related internal control system (ICS) that is intended to ensure the correctness of our (consolidated) accounting and financial reporting.
- Accounting errors are to be strictly avoided and material appraisal errors promptly and transparently reported.

# Anti-Corruption and Anti-Bribery

Corruption harms both our company and the countries in which we operate. We do not tolerate corrupt behavior. In our relationships with business partners and public officials, we do not provide or accept payments or benefits that are intended to, or might appear to, influence business decisions or to otherwise gain an improper advantage. This includes so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.

We are actively involved in the fight against corruption, for example through our support of the United Nations Global Compact. Compliance with applicable anti-corruption laws is indispensable in all of our business activities.

## **Here is what you can do:**

- Observe our Anti-Corruption and Business Ethics Policy.
- Take preventive measures by avoiding all forms of potential corruption and bribery. Corruption is illegal. It can result in fines or prison sentences and loss of employment.
- If you have any questions, contact your manager, your Business Unit Office or the legal department.

**During a tender process I received a call from the customer's procurement manager. He said the contract could go my way but on one condition: If I provide him – under the table – with a cash "incentive" he will award the contract to EzzyShip instead of one of the competitors. It would mean I hit my targets and even with such a payment to the customer's manager this is still very profitable for EzzyShip. Can I go ahead?**

**No, this would be a breach of the Code of Conduct. Accepting such a demand would qualify as an act of corruption and could result in criminal proceedings and even loss of your employment. Report the situation to your manager and involve the relevant Compliance Office. They will support you in handling the matter appropriately.**

# Gifts, Hospitality and other Benefits

Gifts, hospitality and other benefits are only permitted in day-to-day business as long as they are within socially accepted norms. In particular, they may not be, nor give the impression of being, able to influence current or future business decisions.

Only gifts, hospitality or other benefits that comply with the principles of our Anti-Corruption and Business Ethics Policy may be given or accepted. If necessary, obtain the approvals listed there. Particularly strict rules apply if you have business dealings with public officials. Be sure that you are familiar with and adhere to the guidelines set out in the Anti-Corruption and Business Ethics Policy when interacting with public officials.

## Here is what you can do:

- Observe our Anti-Corruption and Business Ethics Policy. It includes clear criteria for determining what gifts, hospitality and benefits may be given or accepted and whether approval is required.
- If in doubt, decline gifts, hospitality or other benefits or contact your Business Unit Compliance Office.

**A supplier invited me to a game in which my favorite team is playing. I would really like to go because I would finally get to see the VIP area. Am I allowed to go?**

**Always consider whether the invitation might involve return favors. Check the criteria in the Anti-Corruption and Business Ethics Policy and determine whether you need approval from your manager or your Compliance Office. The actual value of the invitation is also a factor**

# Free Competition

We are committed to the principles of free enterprise and open competition. Company business must be conducted on the basis of merit and open competition. We hire third parties, such as suppliers, consultants or other intermediaries, only after careful and fair assessment. We are legally bound to make business decisions in the best interests

## Here is what you can do:

- Observe our Competition Compliance Policy. Compliance with it is mandatory.
- Inform your manager in the event that competitors express an interest in reaching agreements on matters such as pricing, allocation of customers/ markets, or bids.
- Do not exchange information with competitors on matters such as prices, margins, customer information (including revenue and discounts) or strategy.

**Am I permitted to use publicly available (price) information from competitors?**

**The key issue is whether the information is publicly available. Antitrust law allows the free use of information available from annual reports, online reports, trade journals or press releases.**

# Conflicts of interest

We expect you to maintain high ethical standards in dealing with conflicts of interest. A conflict of interest exists if your private activities or relationships could, or could appear to, result in you no longer being able to perform your duties for EzzyShip independently and objectively. Relationships that could lead to a conflict of interest include family ties, partnerships with business partners and competitors, or shares or investments in their companies.

## Here is what you can do:

- Observe our Anti-Corruption and Business Ethics Policy. It also includes clear criteria regarding conflicts of interest.
- Notify your manager of any existing and potential conflicts of interest immediately. Measures to deal with the conflict of interest will be taken and documented in consultation with the responsible HR department.

**Soon I will be negotiating with various suppliers. I am related to the managing director of one of the suppliers. Can I award her the contract without reservations if she provides the best quote?**

**You need to inform your manager about this relationship. Your manager will arrange the necessary measures with the HR department. These could include ensuring that you are not involved in the selection process.**

# Customs, Export Controls and Sanctions

In the interest of responsible and ethically sound business practice, we always act in accordance with legal regulations and international conventions. We comply with the applicable laws and regulations on export controls, sanctions and customs clearance in all regions and countries. These relate not only to the movement of goods, they can also have an impact on things such as financial transactions, the use of technology, procurement, or the hiring of personnel.

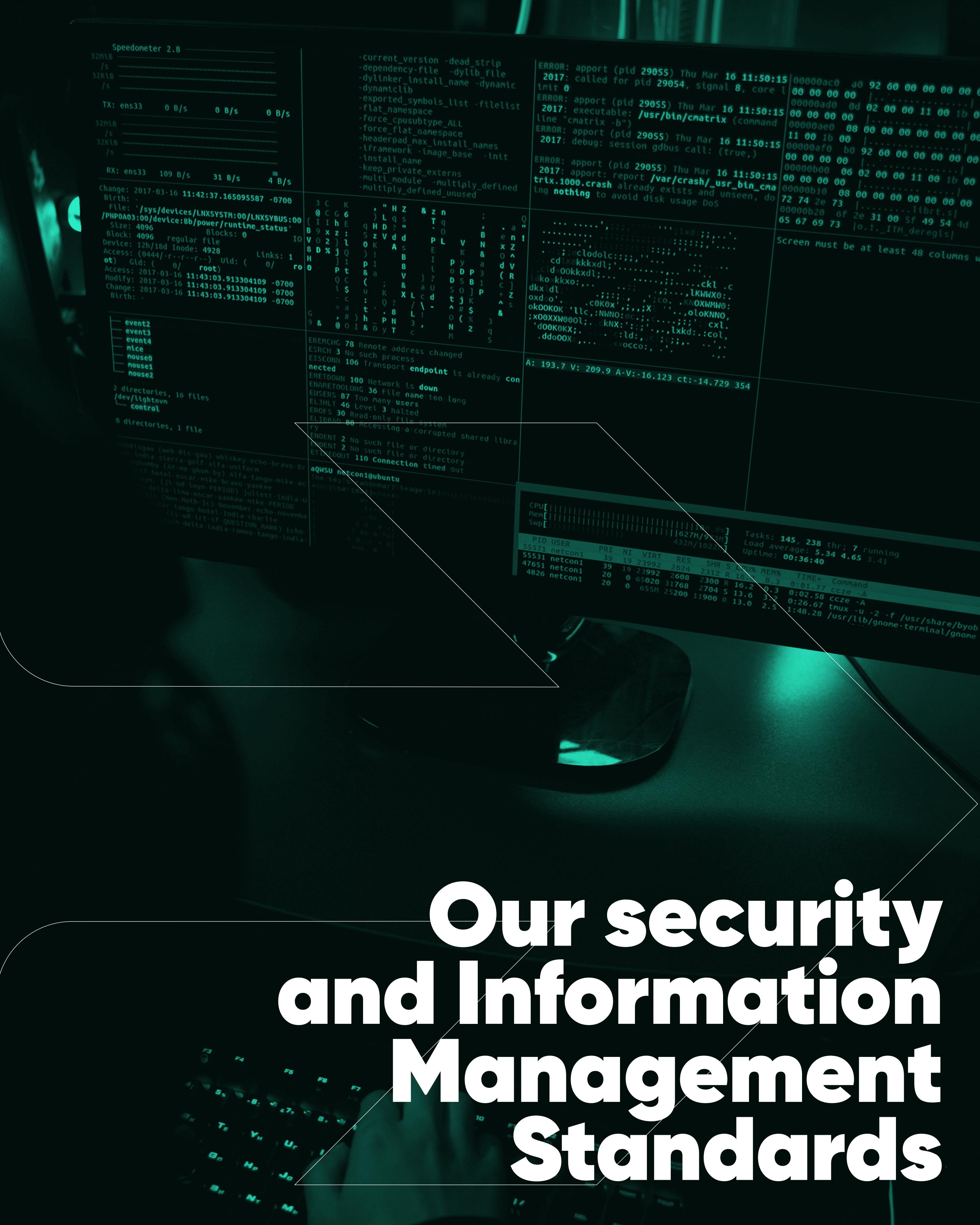
## Here is what you can do:

- Comply with all regulations governing export controls, sanctions and customs clearance.
- Always observe all corresponding internal regulations and guidelines.
- Do not hesitate to consult your manager, Divisional Export Control Officer (DECO) or your legal department immediately if questions, legal uncertainties or suspicions arise.

**I work in Procurement. Do I also need to comply with the laws and regulations governing export controls and sanctions?**

**All EzzyShip Group departments conducting business with third parties must comply with foreign trade regulations. This applies all the more if goods and technologies are being procured and used for the Group's own purposes**

# Our security and Information Management Standards



# Company Property

All of us have a responsibility to safeguard and properly use EzzyShip property. The use of company property (including labor, supplies, equipment, buildings or other assets) for personal benefit is prohibited where not explicitly allowed by special agreements.

We attach great importance to the protection of intellectual property from unauthorized use or disclosure. Such property includes trade secrets; confidential information; copyrights; rights to trademark, patent and design protection; customer lists; business opportunities; and product specifications. This applies whether these intellectual property rights are held by a EzzyShip company, affiliated companies or business partners.

**I noticed an unusual use of the EzzyShip brand. What can I do?**

**Document the situation carefully and contact Corporate Communications or the appropriate marketing department. They will verify legitimate use of the brand.**

## **Here is what you can do:**

- Inform yourself about the intellectual property situation with respect to patents, utility models or trademarks. If you have questions, contact the legal or patent department.
- Always respect confidentiality as stipulated in contracts or employment agreements.
- Report inventions developed during your work to your manager or HR department without delay

# Data Protection

Our data protection management system guarantees appropriate, compliant and careful processing of personal data. A key component of this system is the EzzyShip Data Privacy Policy, which lays down minimum standards for cross-border data transfer and the protection of data subjects during cross-company processing of personal data within the Group. This includes all information that gives insight into the identity of a natural person, such as name, address, telephone number, e-mail address, date of birth or social security number.

## **Here is what you can do:**

- Do not disclose any personal data unless you are legally permitted to do so.
- If you are unsure whether you are permitted to process certain personal data, ask the data protection officer at your location or contact the Global Data Protection department.

**My department would like to roll out a new IT system. What do I need to consider with regard to the processing of personal data in this system?**

**Before rolling out or updating an IT system, ask yourself what purpose the system serves and what personal data you really need to collect to fulfill that purpose (data minimization). Check the relevant legal basis for the processing of personal data. If in doubt, contact your local data protection officer or talk to the Global Data Protection department.**

# Information Security

Digitalization is a strategic imperative for enhancing the dialogue with our employees and customers and improving our operational efficiency. Safeguarding our IT infrastructure against tampering and unauthorized access is therefore a high priority for the Group. Strict information security standards that we use to protect information relating to our company and our customers, business partners and employees are essential to our business success. They enable us to maintain confidence in our services and safeguard our business continuity

## **Here is what you can do:**

- Be wary of any e-mails from unknown external sources. Often they may appear to be from a trustworthy source but are designed to trick you into revealing important data (phishing) or downloading malware.
- The risk of being deliberately targeted by cybercriminals seeking to gain access to confidential company information is high.

**What should I pay particular attention to in order to protect myself from cybercrime?**

**Think before you click! If you think an e-mail looks suspicious or might be a phishing attempt, report it.**

# Social Media

Respect, tolerance, honesty and integrity toward employees, customers and the general public also apply to our use of social media. As employees of the company, we must always express ourselves in a respectful and professional manner. Misuse of intellectual property or publication of confidential or internal data and information is prohibited.

## **Here is what you can do:**

- Internal matters must remain internal. Without exception, treat all sensitive information and business secrets pertaining to our company, our partners and our suppliers as strictly confidential. Do not mention clients, partners or suppliers without their consent.
- Information that is posted on our internal social networks is confidential. Do not share it on public social networks without consent

**Can I write comments on behalf of EzzyShip?**

**Only authorized personnel may post official statements, announcements and publications from EzzyShip online. If you make remarks about EzzyShip, go ahead and openly state your affiliation with the company. Be sure to write in the first person and, in doing so, make it clear that what is being said is your own opinion and not that of the company**

# Corporate security and crisis management

Security is our common asset! We provide a safe working environment for our employees and comprehensive protection against security threats and risks for our financial interests and our tangible and intangible assets. Essentially, this involves implementing crime prevention measures to protect our customers' infrastructure, processes, information and goods, as well as constantly monitoring the global security situation and reviewing our travel security standards. Our crisis management capabilities also help to ensure business continuity even in emergencies.

## **Here is what you can do:**

- Maintain confidentiality and integrity when handling information and trade secrets. Our customers and investors rely on us to exercise this responsibility conscientiously

**I am planning a business trip to a country where there has been recent unrest, and I am concerned about my personal safety. Where can I get advice and assistance?**

**Before leaving on a business trip, you can consult an information portal for up-to-date information and security advice for individual countries. If you have any questions, contact the Corporate Security & Crisis Management department.**



**Have  
Questions?**

# If you have Questions

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