

CODE OF CONDUCT

Code of Conduct for the
employees of nox Germany GmbH



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FOREWORD BY THE MANAGEMENT

Dear colleagues,

the objective of our business activities at nox Germany GmbH is to offer our customers added value and, in doing so, to take account of the concerns of society, the environment and our fellow human beings in every respect and at all times.

We therefore bear a special corporate responsibility and are convinced that holistic thinking and action, taking into account social, ecological and economic challenges, form the fundamental basis for value-creating and sustainable growth.

Our business practices cultivate a responsible approach to nature and its resources. We attach great importance to respectful, fair and cooperative dealings with our employees and business partners. Our Code of Conduct therefore defines the minimum requirements for

social, environmental, ethical and human rights obligations.

This Code shall apply for an indefinite period. However, we reserve the right to adjust these requirements appropriately in accordance with the laws currently in force. In such a case, we expect the adapted principles to be respected. Furthermore, we reserve the right to conduct unannounced visits and investigations regarding compliance with the Principles.

Achieving these standards is an ongoing process and requires continuous improvement. We are therefore dependent on continued good cooperation and would like to thank all our colleagues for their important contribution to the success of our company.

The Management



Alexander Kohnen
CEO



OUR CODE OF CONDUCT

OBJECTIVE

Our Code of Conduct defines our daily business behaviour and is based on our corporate mission and culture. It forms a concrete framework for action for all employees. Compliance with the Code sustainably strengthens the employees' identification with nox Germany GmbH and promotes the development of a positive corporate image. The defined principles ensure compliance with applicable laws, regulations, standards, contractual obligations and other binding obligations.

SCOPE

The Code of Conduct applies to all employees at all locations and organisational units of nox Germany GmbH. The defined rules are equally binding for all, regardless of function or area of responsibility.



BASIS

Our Code of Conduct is based on the principles of the United Nations (UN) Universal Declaration of Human Rights as well as the UN Global Compact (Code of Conduct for a Globalised Economy), the core labour standards of the International Labour Organisation (ILO) and Supply Chain Act on Corporate Due Diligence Obligations.

REPORTING OBLIGATION IN CASE OF NON-COMPLIANCE & SANCTIONS IN CASE OF VIOLATION

If employees become aware of violations of the Code of Conduct, we encourage them to report them immediately.

The whistleblower portal (see QR code) or the e-mail address compliance@nox-nachtexpress.de can be used for this purpose. Employees can also find further information in the whistleblowing policy. All communications will be treated confidentially. Violations of the provisions of this Code of Conduct, of laws or internal company rules will not be tolerated and may have consequences under labour law, criminal law but also civil law.



www.whistleblowersoftware.com/secure/group-nox

DO YOU HAVE ANY QUESTIONS?

If you are uncertain about the application of the Code of Conduct or have questions about its potential impact on our business or our ethical objectives, please contact your direct manager or senior management.

OUR ETHICAL OBLIGATION

APPLICABLE LAW & ETHICAL PRINCIPLE

It is a matter of course for us that all employees of nox Germany GmbH adhere to all legal regulations applicable to our business activities and ensure that they are complied with. Every manager is therefore obliged to know the applicable laws, regulations and internal rules and to set an example by complying with them.

We do justice to the different interests of our business partners and customers by behaving honestly, fairly and with integrity.

HUMAN RIGHTS

The principles of the United Nations Global Compact serve as our orientation and we pay attention to the observance of human rights within our sphere of influence at all times. We do not support or tolerate any form of child or forced labour. Taking into account the applicable national law, we respect the principles of the International Labour Organisation (ILO) on fundamental rights and principles at work.

We comply with the provisions of the Minimum Wage Act (MiLoG) and ensure that our employees within the scope of the Minimum Wage Act are paid at least the applicable statutory minimum wage where they fall within the personal application area of the Act.



OUR PRINCIPLES

EQUAL OPPORTUNITIES & DIVERSITY

We do not tolerate any unlawful discrimination against employees, irrespective of skin colour, national or social origin, culture, religion, gender, age, sexual orientation, disabilities, political or philosophical convictions or other characteristics and undertake to firmly oppose any form of discrimination, harassment, threats or mistreatment. We distinguish ourselves by living diversity in our cooperation and this is an important basis for a customer-oriented, successful service company. We reject any kind of discrimination, exclusion or restriction that leads to or has the goal to impair or prevent the equal rights of men and women in the recognition, utilisation or exercise of human rights and fundamental freedoms for women.

TRANSPARENCY, COMMUNICATION & FREEDOM OF ASSOCIATION

We respect the privacy, personal dignity and personal rights of all employees equally. Our dealings with our employees are characterised by openness and honesty as well as mutual respect, responsibility and trust. We respect the fundamental right of our employees to freedom of association and collective bargaining.



QUALITY, EFFICIENCY AND CUSTOMER SATISFACTION

The fundamental basis for valuecreating and sustainable growth is our corporate responsibility and our holistic thinking and actions, taking into account social, ecological and economic challenges.

Our customers' quality expectations of our service have the highest priority for us within the framework of our network integrity and therefore it is our claim to promote a continuous improvement of our processes and services. We believe in partnership and therefore involve our customers in the development of new products and services.

HEALTH & SAFETY CONDITIONS

Our employees make a significant contribution to the economic success of our company. Therefore, the wellbeing and safety of our employees is very important to us.

Compliance with the applicable occupational health and safety laws as well as internal occupational health and safety guidelines with regard to working hours, occupational safety and health protection are a matter of course for us. We promote appropriate and fair remuneration. We are constantly working to develop appropriate procedures and protective measures to ensure health and safety at work and carry out prevention work within our area of responsibility.

The consumption and carrying of drugs at the workplace is strictly prohibited throughout the company. Any form of alcohol consumption that interferes with work performance, safety or the well-being of other employees will not be tolerated.

During working hours, all employees are required to be in a state that enables them to perform their tasks in a safe and productive manner.

Through effective risk and emergency management, we safeguard our processes and the health and safety of our employees against hazardous situations.

ENVIRONMENTAL PROTECTION & SUSTAINABILITY

As part of our responsibility, we take an integrated approach to sustainability and environmental protection. Our integrated management system supports us in analysing potential environmental impacts so that we can effectively counteract negative effects on our environment. The objective is to create a balance between ecological, social and economic sustainability. Through effective stakeholder management, we combine maximum customer benefit, sustainable economic growth, the highest safety standards and the greatest possible environmental and climate compatibility.



OUR BUSINESS PRACTICES

FAIR COMPETITION

Our long-term objective is to secure and sustainably expand our market position. We always comply with the applicable rules of free and fair competition and antitrust law and carefully select our transport partners and suppliers. We always make sure that all stakeholders involved in the value chain can be successful.

CONFLICT OF INTEREST

We expect our employees to act ethically at all times so that no personal dependencies, obligations or other conflicts of interest arise. Therefore, business relationships with relatives or other related persons should be avoided. Our employees are obliged to recognise any conflicts themselves, to actively counteract them and to report them immediately to their direct manager.

EXPORT CONTROLS AND ECONOMIC SANCTIONS

We comply with all applicable laws and regulations of national and international law on import and export controls, sanctions, embargoes and restrictions on the (re-)export of goods to certain countries.

FINANCIAL RESPONSIBILITY

We ensure for accurate accounting and record keeping. We comply with statutory requirements on accounting and generally recognised accounting principles.



BRIBERY, EXTORTION AND CORRUPTION

Any form of bribery, corruption, extortion or embezzlement, as well as the attempt thereof, is prohibited. As a matter of principle, our employees avoid conflicts between personal interests and professional duties and they do not grant, request or accept any improper benefits, gifts, payments or other inducements of any kind that do not comply with the law. Gifts and invitations are only accepted if they comply with the politeness, customs or practices of the respective country and, in case of doubt, require the approval of the respective manager.

DEALING WITH BUSINESS PARTNERS

All employees represent the products and services of nox Germany GmbH in their dealings with business partners. Therefore, the principles of the Code of Conduct must be observed at all times. We always act with integrity in our business relationships. We therefore also expect our business partners, suppliers, subcontractors and consultants to comply with applicable laws and the principles of this Code of Conduct. Details are set out in our Supplier Code of Conduct. We always deal with governments, authorities and political interest groups in a transparent and honest manner, taking into account the applicable law.

DEALING WITH COMPANY

PROPERTY

As a matter of principle, we handle company property, intellectual property or other assets of nox Germany GmbH in a responsible manner. We use the company property exclusively for the intended business purposes.

Misuse for other purposes, e.g. for inappropriate personal or illegal purposes, is prohibited.

DATA PROTECTION, CONFIDENTIALITY

& INFORMATION SECURITY

As a matter of principle, we comply with the applicable legal requirements with regard to company and IT security as well as data protection. All employees are responsible for data protection, confidentiality and information security in their daily work and are aware of this responsibility. Transparency about the purpose and effect of the data collection as well as the storage in the handling of data play an important role for us.

Through appropriate technical and organisational measures, we ensure compliance with applicable laws and protect our company from risks and threats. All employees protect confidential information and information subject to the Data Protection Act from unauthorised access and do not use it to promote their own interests. This duty of confidentiality applies to all company and business secrets and remains in force even after termination of the employment relationship and also applies when communicating with colleagues. Unless the information is directly required for the work, the disclosure of such information constitutes a breach of the duty of confidentiality. If confidential information has to be passed on to external partners (e.g. management consultants), a confidentiality agreement must be signed.

INFO SHEET

CODE OF CONDUCT

PRINCIPLES OF THE UNITED NATIONS UNIVERSAL

DECLARATION OF HUMAN RIGHTS (UN)

The United Nations Universal Declaration of Human Rights, which consists of 30 articles, is about the fundamental rights that every human being should be entitled to. Many states have included human rights in their constitutions. In Germany, human rights are enshrined in the Basic Law of the Federal Republic of Germany.

(Sources: <https://www.un.org> and <https://www.menschenrechtserklaerung.de>)

UNITED NATIONS GLOBAL COMPACT

(UN GLOBAL COMPACT)

This is a global pact concluded between businesses and the UN. Businesses are called upon to align their strategies with the 10 principles of the UN Global Compact and the 17 Sustainable Development Goals (SDGs) and to promote measures to implement them so that globalisation benefits all the people of the world.



THE 10 PRINCIPLES OF THE UN GLOBAL COMPACT:

Human rights

- 1 Businesses should support and respect the protection of international human rights.
- 2 Businesses should ensure that they are not complicit in human rights abuses.

Labour standards

- 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- 4 Businesses should work for the elimination of all forms of forced labour.
- 5 Businesses should work for the abolition of child labour.
- 6 Businesses should work to eliminate discrimination in employment and occupation.

Environment

- 7 Businesses should follow the precautionary principle in dealing with environmental problems.
- 8 Businesses should take initiatives to promote greater environmental awareness.
- 9 Businesses should accelerate the development and diffusion of environmentally friendly technologies

Prevention of corruption

- 10 Businesses should work against all forms of corruption, including extortion and bribery.

(Sources: <https://www.globalcompact.de> and <https://sdgs.un.org>)



CORE LABOUR STANDARDS OF THE INTERNATIONAL LABOUR ORGANISATION (ILO)

The core labour standards of the International Labour Organisation are 5 basic principles that aim to ensure decent working conditions and adequate protection. The concrete formulation of the basic principles can be found in 10 conventions, which are referred to as core labour standards.

5 Basic Principles:

- ▶ Freedom of association and right to collective bargaining
- ▶ Elimination of forced labour
- ▶ Abolition of child labour
- ▶ Prohibition of discrimination in employment and occupation
- ▶ A safe and healthy working environment

The 10 Conventions:

- ▶ Convention 87: Freedom of Association and Protection of the Right to Organise (1948)
- ▶ Convention 98: Right to Organise and Collective Bargaining (1949)
- ▶ Convention 29: Forced Labour (1930) and of 2014 on the Forced Labour Convention
- ▶ Convention 105: Abolition of Forced Labour (1957)
- ▶ Convention 100: Equality of Pay (1951)
- ▶ Convention 111: Discrimination in Employment and Occupation (1958)
- ▶ Convention 138: Minimum Age (1973)
- ▶ Convention 155: Occupational Health and Safety (1981)
- ▶ Convention 182: Prohibition and immediate action for the elimination of the worst forms of child labour (1999)
- ▶ Convention 187: Promotional Framework for Occupational Health and Safety (2006)

(Source: <https://www.ilo.org>)

UN CONVENTION ON THE RIGHTS OF THE CHILD

The UN Convention on the Rights of the Child is a set of rules of the United Nations that emphasises the needs and interests (e.g. right to education or also right to protection from violence) of all children worldwide. Every child needs special protection and care to develop healthily.

(Source: <https://www.unicef.de>)

UN CONVENTION ON THE ELIMINATION OF ALL FORMS OF DISCRIMINATION AGAINST WOMEN

The UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) is a United Nations international convention on the elimination of all forms of discrimination against women. This is the most important international convention for the protection of the rights of girls and women.

(Source: <https://www.unwomen.de>)

SUPPLY CHAIN ACT ON CORPORATE DUE DILIGENCE OBLIGATIONS

The Supply Chain Act on Corporate Due Diligence Obligations stipulates that companies concerned must strive to ensure that there are no human rights violations in their own business operations and in the supply chain

(Source: <https://www.taylorwessing.com/>)

More informations:
<https://www.csr-in-deutschland.de/DE/Wirtschaft-Menschenrechte/Gesetz-ueber-die-unternehmerischen-Sorgfaltspflichten-in-Lieferketten/gesetz-ueber-die-unternehmerischen-sorgfaltspflichten-in-lieferketten.html>



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