

# **CODE OF CONDUCT**

Code of Conduct for Business Partners  
of nox Germany GmbH

# PREFACE BY THE EXECUTIVE BOARD

Dear business partners,

our business activities should provide added value for society, the environment and our fellow human beings. 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 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 for Business Partners defines the minimum requirements for social, environmental and ethical challenges as well as human rights obligations. It forms the basis for a business relationship with us.

This Code of Conduct is based on the following guidelines:

- ▶ Principles of the United Nations Universal Declaration of Human Rights (<https://www.un.org> and <https://www.menschenrechtserklaerung.de>)
- ▶ United Nations Global Compact (Code of Conduct for a Globalised Economy) (<https://www.globalcompact.de> and <https://sdgs.un.org>)
- ▶ Supply Chain Act on Corporate Due Diligence Obligations
- ▶ Core labour standards of the International Labour Organisation (ILO) (<https://www.ilo.org>)

▶ UN Convention on the Rights of the Child (<https://www.unicef.de>)

▶ UN Convention on the Elimination of All Forms of Discrimination against Women (<https://www.unwomen.de>)

We therefore expect our business partners to comply with the laws and regulations of the countries in which they operate, as well as with the standards set out in this Code of Conduct. We expect you to train your employees on these principles and to encourage and promote compliance at all times. We expect our business partners to identify risks with regard to their supply chains as well as to take appropriate measures. In the event of suspected violations as well as to safeguard supply chains with increased risks, we require our business partners to immediately communicate to us the identified violations and risks and the measures taken.

We reserve the right to adjust these requirements appropriately in accordance with the laws currently in force. We will report any changes on our homepage. 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.

We understand that achieving these standards is an ongoing process and requires continuous improvement. Nevertheless, a violation of this Code of Conduct may be grounds for us to terminate the business relationship.

**Many thanks for the good cooperation!**



Alexander Kohnen  
CEO

# **YOU HEREBY EXPRESSLY UNDERTAKE TO COMPLY WITH THE FOLLOWING PRINCIPLES:**

## ***Respect for human rights, anti-discrimination, harassment and women`s right***

- ▶ You respect the personal dignity, privacy and other rights of all employees and are not complicit in human rights abuses. Your employees must not be physically punished or physically, sexually, psychologically or verbally harassed or abused.
- ▶ You promote equal opportunities and equal treatment for all employees and are committed to anti-discrimination. You make your business decisions regardless of gender, national, ethnic or social origin, skin colour, disability, health status, political beliefs, ideology, religion, age, pregnancy or sexual orientation. You 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.
- ▶ You recognise the principle of equal pay for men and women and always take into account only the skills and qualifications of employees in your business decisions, especially in recruitment, promotion, remuneration, special benefits, training, dismissal and termination.
- ▶ You comply with the legal requirements of the Minimum Wage Act (MiLoG) and all other components of the employment contract.
- ▶ You exclude forced labour of any kind as well as forced prison labour, servitude and the like.
- ▶ You respect the right of your employees to freedom of association and collective bargaining within the framework of national laws.

## ***Prohibition of Child Labour***

- ▶ You ensure that your employment practices are free from any form of child labour. Unless local law sets a higher age limit, do not employ a person who is of compulsory school age or younger than 15 years (exceptions according to ILO Convention 138). You ensure that employees under the age of 18 do not carry out dangerous work and work only limited hours at night, taking into account the requirements of their training.

## ***Conflicts of interest***

- ▶ You shall disclose any potential or actual conflict of interest (e.g. due to personal dependencies based on family relationships) that could improperly influence the business relationship with nox Germany GmbH.



## ***Prohibition of Corruption and Bribery***

- ▶ You refrain from any form of corruption or bribery and promote fair competition in the market. You protect themselves and others from all forms of anti-competitive practices, bribery and corruption.

## ***Health and Safety of Employees***

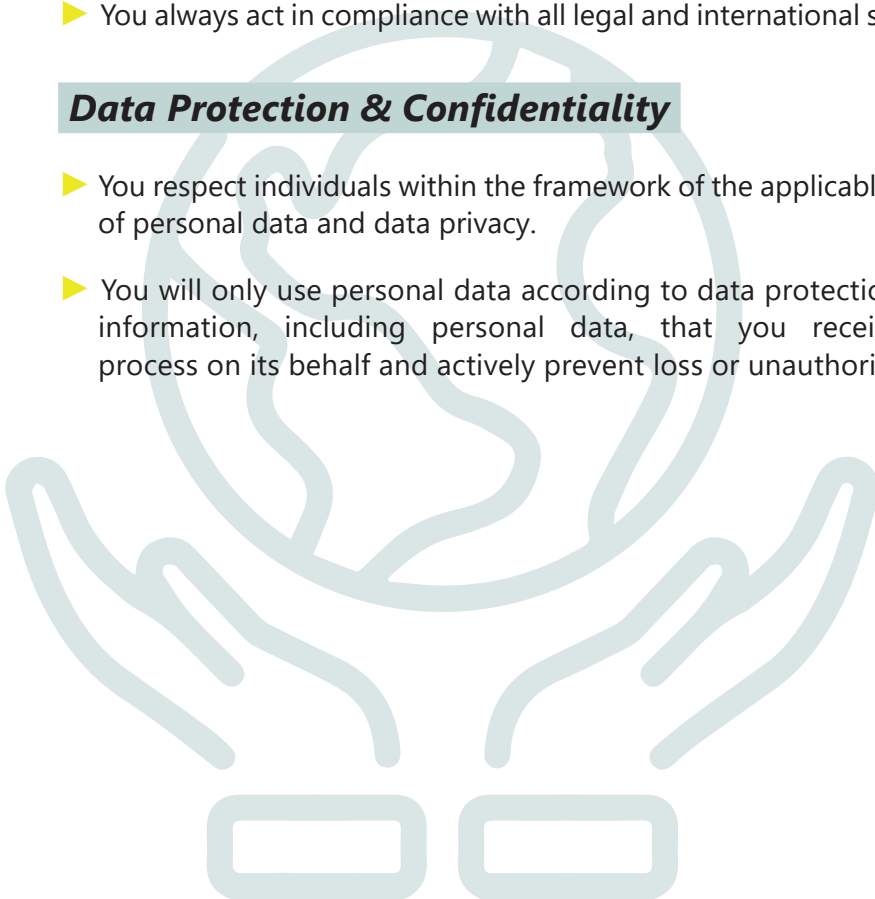
- ▶ You take responsibility for the health and safety of your employees and ensure a safe and healthy working environment.
- ▶ You control any risks and initiate the best possible precautions and measures to actively prevent accidents and occupational diseases.
- ▶ You ensure that your employees are informed about applicable health and accident prevention matters through appropriate training.

## ***Contribution to Environmental Protection***

- ▶ You comply with the principles of the UN Global Compact and related laws and combat inappropriate and unlawful behaviour.
- ▶ You make an active contribution to environmental protection and help to reduce the consumption of raw materials and energy, conserve natural resources and reduce waste disposal.
- ▶ You oblige to be responsible, committed and transparent with regard to the continuous improvement of your obligation to sustainable development.
- ▶ You always act in compliance with all legal and international standards on environmental protection.

## ***Data Protection & Confidentiality***

- ▶ You respect individuals within the framework of the applicable legal requirements for the protection of personal data and data privacy.
- ▶ You will only use personal data according to data protection guidelines and protect confidential information, including personal data, that you receive from nox Germany GmbH or process on its behalf and actively prevent loss or unauthorised access.



## **Export controls and economic sanctions**

- ▶ You 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.

## **Intellectual property and counterfeits**

- ▶ You respect the rights of intellectual property. You ensure that the exchange of technology and knowledge takes place in such a way that intellectual property rights and customer information are protected. Counterfeit products may neither be circulated nor acquired.

## **Financial responsibility**

- ▶ You ensure accurate accounting and record keeping. You comply with statutory requirements on accounting and generally recognised accounting principles.

## **REPORTING PROCEDURE FOR VIOLATIONS OF THE CODE**

- ▶ If employees of yours suspect that employees of nox Germany GmbH or a person acting for or on behalf of nox Germany GmbH have engaged in illegal or otherwise unauthorised activities, report this immediately to nox Germany GmbH.
- ▶ We guarantee confidentiality and, if desired, of course anonymity of the reporting persons and circumstances. For this purpose, please contact nox Germany GmbH and inform us, in as much detail as possible, about possible violations.



### **WOULD YOU LIKE TO REPORT AN INCIDENT?**

Then use our digital whistleblower portal (QR code) to report it or send us an e-mail to: [compliance@nox-nachtexpress.de](mailto:compliance@nox-nachtexpress.de)

By mail to the following address:

**CONFIDENTIAL / Compliance**  
nox Germany GmbH  
Katzbergstraße 3  
40764 Langenfeld

[www.whistleblowersoftware.com/  
secure/group-nox](http://www.whistleblowersoftware.com/secure/group-nox)

