

## Objective of the Code of Conduct within the Rieck Logistics Group

The Code of Conduct serves as an "orientation framework" to communicate the internal principles and regulations of our organizational structure to new and long-standing employees alike.

All employees are obliged to comply with the guidelines listed here, to follow them and to communicate them internally. Managers have a special role to play here. They act as role models, are the point of contact for all questions and should ensure that the employees in their area of responsibility are adequately informed about the Rieck Group's Code of Conduct.

## I. PRINCIPLES

The Rieck Logistics Group offers its customers and business partners logistics solutions that are always economical, socially responsible and environmentally friendly. As a family-owned company, Rieck sees it as its duty to always conduct all business activities in a legally and ethically impeccable manner.

This Code of Conduct applies to all employees of the Rieck Group and is regularly reviewed and adapted to current requirements (e.g. changes in the law). This helps to ensure the long-term success of the company. Violations of the Code of Conduct will not be tolerated and will result in disciplinary action. Violations of applicable legal norms may also result in criminal and liability consequences.

## II. SAFEGUARDING FAIR COMPETITION

Rieck respects fair and equitable competition. Employees are obliged to comply with the relevant laws regulating competition. In general, the applicable legal provisions prohibit in particular agreements or concerted practices with competitors with regard to prices or conditions, market or customer allocation as well as unfair competitive practices. Not only a specific agreement, but also concerted behavior and informal discussions that have the purpose or effect of restricting competition are prohibited.

## III. FIGHTING CORRUPTION

Rieck is convinced of the quality of its services and the performance of its employees. Rieck firmly rejects the bribery of business partners with money, valuables or other benefits of monetary value. Employees are prohibited from demanding, being promised or accepting money or valuables in return for the purchase of products or other services.

The giving and receiving of benefits of any kind is strictly prohibited if they could give the impression of undue influence or even obligation.

This also applies to hospitality and invitations to events that go beyond customary and legally permitted practices.

Impermissible contributions may also not be made indirectly via third parties.

It is permissible to give and accept customary courtesy and promotional gifts of low value as well as business meals and invitations to events with a direct business connection within a framework appropriate to the business situation and the position of the parties involved.

## **IV. AVOIDANCE OF CONFLICTS OF INTEREST**

Rieck expects its employees and board members not to perform any activities or take on any tasks that run counter to Rieck's interests.

Secondary employment for companies of a competitor, a customer, a partner or a supplier as well as financial interests in such companies that exceed the limit of one percent are only permitted with the express written consent of the management. Financial interests (greater than one percent) of close family members must be reported to the management. Preferential treatment of certain business partners for private interests, in particular preferential treatment of family members, is prohibited. The appearance of preferential treatment for private interests must also be avoided.

## **V. COMPLIANCE WITH THE PRINCIPLES FOR NATIONAL AND INTERNATIONAL TRADE**

Rieck complies with all national, multinational and supranational foreign trade regulations. In particular, employees are obliged to comply with the applicable export and import bans, official approval requirements and the applicable customs and tax regulations. Customer transactions that conflict with these regulations must be rejected. Rieck may not provide services if there is a suspicion that they could support such illegal transactions. In this context, particular emphasis must be placed on compliance with regulations to prevent terrorist activities. Rieck attaches particular importance to compliance with national and international regulations to prevent money laundering.

## **VI. PROTECTION OF BUSINESS ASSETS**

Rieck's business success is based on the innovative strength of its employees and the knowledge they have acquired over many decades. All employees must therefore ensure that Rieck's trade and business secrets, as well as those of its business partners, do not become known outside the company. It is prohibited to disclose trade or business secrets without authorization, to pass them on to third parties or to use them for one's own purposes without authorization.

Rieck expects its employees to handle the company's assets and inventory responsibly and to make business decisions on the basis of commercially viable risk and benefit analyses.

Employees are not authorized to use company resources for personal purposes unless their use for personal purposes has been expressly permitted by their employment contract, separate agreement or by their supervisor. In particular, employees are prohibited from using Rieck's IT systems to view, save or send pages or messages with legally prohibited or offensive content.

## VII. ENVIRONMENTAL PROTECTION & SUSTAINABILITY

Rieck feels obliged to treat nature's resources with care. It therefore goes without saying that the legally applicable environmental protection regulations must be complied with. In addition, employees and managers are expected to work in an environmentally friendly manner. This includes minimizing printing, separating waste and saving water and energy.

Rieck undertakes to publish the applicable legal standards and provisions in accordance with the publication obligation depending on the size of the company from 2026 annually in the form of a CSRD sustainability report in accordance with the ESRS standard, and to actively work on and implement improvement measures.

The sustainability data is based, among other things, on the measurement and publication of CO<sup>2</sup> emissions, energy consumption, waste volumes and their development trends.

## VIII. HUMAN RIGHTS

In the formal guidelines on human rights and working conditions, Rieck publishes the generally agreed minimum requirements so that every person can preserve their dignity.

Rieck is guided by objective and comprehensible criteria in its dealings with employees and in its cooperation with business partners. Rieck guarantees its employees a working environment that complies with EU standards and in which discrimination and any kind of harassment and disadvantages based on nationality, place of residence, gender or national or ethnic origin, religion, skin color, ideology, disability, age or sexual identity are not tolerated.

In addition, Rieck expects its employees to respect different views of life, disabilities and cultural and country-specific characteristics in their dealings with business partners and other employees. This also includes employees employed temporarily or for training purposes, applicants and former employees.

Rieck also expects his managers to promote equality between men and women in professional life and to uncompromisingly avoid or clarify any kind of discrimination.

## IX. OCCUPATIONAL HEALTH & SAFETY

The protection of employees is a top priority at the Rieck Logistics Group. The details are documented in the occupational health and safety guidelines.

Certified safety experts train all employees annually on the following topics:

- Occupational health and safety, including guidelines on personal protective equipment
- Emergency preparedness
- Behavior in case of fire incl. exercises
- Workplace ergonomics

Depending on the area of application, specific training courses cover requirements (e.g. load securing).

Comprehensive measures such as: documented inspections, assessment of workplaces and equipment, technical inspections, measurements of environmental factors (e.g. noise, dust) oblige managers and employees to comply with legal and internal company requirements.

## X. external impact and media relations

Transparent, dialog-oriented and consistent information to the public - including the media - strengthens Rieck's global image. Official statements about the Rieck Group, in particular to the media, may therefore only be made after consultation with the Marketing department. Advertising material such as flyers and customer folders must also be created/approved by the marketing department in accordance with the corporate design concept.

Employees influence the public image of the Rieck Logistics Group. Rieck therefore expects its employees to treat customers and business partners in a friendly, courteous and service-oriented manner at all times. To ensure a uniform appearance, all employees must adhere to the work instructions for e-mail correspondence and conduct on the telephone.

## XI. COMPLAINT MANAGEMENT

Rieck undertakes to promptly review all reported, personalized or anonymous information and messages. The complaints management policy applies.

Rieck Logistics Group

A handwritten signature in blue ink that reads "Ph. Strenge".

*Philipp Strenge Managing Partner*

*Status: 09/2024*