

DACHSER CODE OF CONDUCT

Dachser Corporate Compliance – Integrity in Logistics

DACHSER Code of Conduct

1. Preamble

The foundation for all activities at Dachser is our adherence to legally binding regulations at a national and international level, as well as any obligations entered into on our own free will. All of the employees and organisational units at Dachser are obliged to inform themselves about the rules and regulations applying to their areas of responsibility within the company, to adhere to these, and in case of doubt to obtain more information and advice from the relevant departments or authorities. An employee's superiors should always be the first person of contact.

This Code of Conduct applies worldwide to all employees and organisational units at Dachser. It describes binding principles of conduct which are to be upheld by everyone. This will help to secure the long-term success of our company. Violations of the Code of Conduct will not be tolerated and will lead to disciplinary measures. Furthermore, violations against the applicable laws can lead to consequences resulting from criminal and liability law.

2. Ensuring free and fair competition

Dachser respects free and fair competition. Employees are obliged to adhere to the relevant laws regulating competitive activities. Generally speaking the applicable laws particularly forbid agreements or agreeing on practices with competitors regarding pricing or conditions, with the purpose of dividing up the market or customers and other unfair competition practices.

Not only are actual agreements forbidden, but also agreed-on modes of behaviour and informal discussions aimed at or effecting restricting competition are prohibited.

3. Fighting corruption

Dachser is confident of the quality of its products and services as well as the performance of its employees. Dachser firmly rejects the bribing of business partners with money, objects of value, or other services equivalent to money.

It is forbidden for employees to demand, accept, or accept the promise of money or objects of value in return for the purchase of products or other services.

Giving or receiving donations of any kind is strictly forbidden if it could give the impression of having unauthorised influence or even giving rise to the assumption of an obligation.

This applies also to entertainment, food and drink, and invitations to events over and beyond what is customary and legally acceptable.

Unauthorised donations may not be made or received indirectly through third parties either.

The giving and receiving of the common courtesies and advertising give-aways of low value is permitted, as is the giving or acceptance of business meals and invitations to events with a direct connection to business, to an extent appropriate to the business situation and the position of those involved.

It should be noted, however, that donations and invitations to public officials, representatives of the authorities, or other holders of official positions, are legally forbidden in many countries even if the value is very low.

Dachser rejects the making of “facilitation payments”, and in this regard follows the recommendations of the International Chamber of Commerce (ICC). Facilitation payments are small amounts paid to the representatives of the authorities in order to accelerate official procedures to which one has a right (e.g. customs clearance). These are only permitted if absolutely unavoidable (such as in emergency situations), and only in countries where such payments are permitted. They are then an exception which require approval from one’s superiors, and they must be documented.

4. Avoiding conflicts of interest

Dachser expects its employees and members of its organisational units not to enter into any activities or tasks which violates the interests of the company. Secondary activities for competitors, customers, partners or suppliers, as well as financial participation in such companies which exceeds one per cent, are only permitted with the express written permission of Management. Management must be informed of financial participation (greater than one per cent) on the part of immediate family members. It is forbidden to grant preferential treatment to particular business partners for reasons of private interest – especially family members. Even the appearance of preferential treatment for private interests should be avoided.

5. Compliance with the principles of national and international trade

Dachser complies with all national, multinational, and supranational foreign trade regulations. Employees must abide by these, especially any applicable bans on exports or imports, official authorisation requirements, and applicable customs and tax regulations. Transactions offered by customers which contradict these regulations must be turned down. Dachser may not provide any services or products if a suspicion exists that these could support such illegal transactions. In this context it is especially important to observe the regulations aimed at the prevention of terrorist activities. Dachser also places particular emphasis on adherence to national and international laws for the prevention of money laundering.

6. Creating and maintaining safe and fair working conditions

Dachser takes responsibility for its employees and strives to create and maintain an attractive working environment for them, and to maintain it. Dachser to ensure fair payment and reasonable working hours for its employees in every country, and condemns every form of forced or child labour.

Dachser wants to preserve and promote the health of its employees. For this reason it is one of the company's aims to guarantee a high level of safety at all of its production sites. Dachser expects all of its employees, especially managerial staff, to be committed to uphold on-the-job safety at all times.

7. Protecting company assets

The success of Dachser as a business is based on the innovative capacity of its employees and the knowledge they have acquired over several decades. All employees must therefore ensure that the operational and business secrets of Dachser as well as its business partners do not become known outside of the company. It is forbidden to publicise operational or business secrets without permission, to pass them to third parties, or to utilise them for one's own purposes without permission.

Dachser expects its employees to deal responsibly with the company's assets, and to make business decisions on the basis of risk and benefit analyses that can be followed from a

business perspective. This includes carefully checking the integrity of Dachser's business partners.

Dachser places great value on the integrity of its employees. Depending on the type of business, the place where employees work and the activities they are involved in, it may at times be necessary to assess their financial situation and personal integrity.

All of Dachser's documents – including financial reports (for external use) and accounting documents and invoices (internal use) – must present the relevant factual content correctly and clearly.

Employees are not permitted to utilise operational resources for their own personal purposes, unless this has been expressly allowed in their work contract, or in a separate agreement, or by their superiors. In particular it is forbidden for employees to utilise Dachser's IT systems to view, save or send pages or messages containing legally prohibited or offensive material.

8. Protection of the environment

Dachser considers itself committed to the careful handling of natural resources. It is therefore natural that Dachser should uphold the legal regulations that apply to the protection of the environment.

9. Prevention of discrimination

Dachser follows objective and comprehensible criteria in its dealings with employees and with its business partners. Dachser guarantees its employees a working environment in which discrimination and any type of aggravation or disadvantage on account of race, ethnic origin, gender, religion, worldview, disability, age or sexual identity are not tolerated.

Dachser expects its employees to respect different views on life as well as cultural and national differences in their dealings with other employees, including temporary employees and people employed for training purposes, applicants, former employees, and also business partners.

In addition to this, Dachser expects its managerial staff to make a special effort to promote equality between men and women in professional life.

10. Dealings with the media

Providing the public – including the media – with clear, dialogue-oriented and consistent information strengthens the global image of Dachser. Official statements, especially to the media, may therefore only be made after consultation with the authorised employees.

11. Implementation and organisation

All of Dachser's employees are obliged to abide by this Code of Conduct. Managerial staff play a particularly important role in this. They are role models, they are to be available for any questions regarding the code of conduct and they are responsible for ensuring that within their area of responsibilities, the employees are sufficiently aware of the principles and the other elements of Dachser's system of values.

All of Dachser's employees receive training which is specially designed for their areas of activity and their needs.

The Code of Conduct is reviewed regularly and amended in accordance to the current requirements (changes in law, for example).

If and when required, guidelines will be drawn up to supplement the principles of this Code of Conduct; they will contain detailed instructions for action, and where necessary regulations specific to different countries; and they shall be considered to be binding.

Our business partners will be made aware of this Code of Conduct. We also expect them to behave fairly, with integrity, and in compliance with the law. The version for publication shall be made available to our business partners at a later date.