

Code of Conduct of the NEXUS SCM GmbH

(mentioned below NEXUS SCM)

1. Principle:

The NEXUS SCM pursues sustainable development that reconciles economic success with ecological and social responsibility. Accordingly, our corporate policy is based on ethical and moral principles that form the framework for our actions.

Environmental protection: Climate protection is an integral part of the business policy and strategic direction of the NEXUS SCM. Far-sighted and considerate use of natural resources is to be ensured. In this context, the NEXUS SCM focuses on reducing CO2 emissions, energy consumption and resource and waste management.

Social sustainability: We are aware that our employees are our most valuable resource and form the basis of our company's success. Uniform ethical principles and rules of conduct help us achieve our goals. They give us the necessary security and orientation in our day-to-day work.

Economic Sustainability: The fundamental elements of NEXUS SCM's economic sustainability are operational efficiency, customer satisfaction and investments in environmentally friendly and sustainable technology. Increasing operational productivity plays a crucial role in customer satisfaction and increasing profitability. To this end, NEXUS SCM is constantly engaged in continuous improvement and development activities.

2. Scope of the NEXUS SCM Code of Conduct :

The NEXUS SCM Code of Conduct is mandatory in all NEXUS SCM country branches. The Code of Conduct aims to inform our employees, customers, suppliers, vicarious agents and other interested parties about our goals and rules.

3. Leadership and Commitment:

The management of NEXUS SCM is responsible for the implementation and effectiveness of the Code of Conduct. At the same time, this code of conduct obliges all employees and business partners to act responsibly, ethically and lawfully.

4. Social Responsibility:

human rights: We respect human rights and conduct our business in a way that makes us a preferred and attractive employer. We are expressly committed to abolishing all forms of forced and child labour. Our commitment to respect human rights applies to all our employees. All employees undertake to behave lawfully towards colleagues, partners and other interested parties. We expect our partners to pass on our commitment to respect human rights to their business partners and to act ethically and with integrity.

child labour: We reject any form of child labour. No person will be employed who is younger than the minimum age stipulated by law. The minimum age for admission to employment must not be lower than the age at which compulsory education ends and under no circumstances under 15 years. National standards for the protection of child and young people employed must be observed, e.g. working hours or working conditions. Young people must be protected from economic exploitation, from carrying out work that is dangerous, that could impair the young person's education or that could endanger the health or physical, mental, spiritual, moral or social development of the young person.

forced labour: We reject any form of forced labour. Work must always be voluntary. We do not tolerate any form of forced labour, including debt bondage, indentured labour, any form of human trafficking, forced marriage, forced prostitution or other forms of modern slavery. Employees must be able to terminate work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual or personal harassment.

prohibition of discrimination; We reject any form of discrimination. Discrimination in the application process, when hiring or during employment in any form is prohibited. This applies, for example, to discrimination based on gender, race, caste, skin colour, disability, political opinion, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and

personal rights of each individual are respected. We value all employees equally. The basis for the selection and promotion of employees are qualifications, performance, individual skills and experience.

freedom of association: The right of our employees to form and join organizations of their choice and to bargain collectively without threat or intimidation must be respected. We recognize and respect the right to bargain collectively within the framework of applicable laws. Employees who act as employee representatives are not disadvantaged or favoured in any way.

working conditions: All applicable laws and regulations (hereinafter collectively referred to as "standards") relating to employees must be complied with without restriction. For example, in Germany these are the standards of the Working Hours Act (ArbZG), the Minimum Wage Act (MiLoG), the Federal Vacation Act (BUrlG), the Continued Remuneration Act (EFZG), the Maternity Protection Act (MuSchG) and the applicable Accident Prevention Regulations (UUV) or professional association regulations (BGV) as well as the Social Security Code (SGB), the Driving Personnel Act (FPersG) and the Driving Personnel Ordinance (FPersV). Compliance with this Code of Conduct must not be circumvented or undermined by employment contract agreements or other measures. Any attempts to circumvent applicable labour and social insurance standards will be punished and can lead to immediate termination of the contract.

Remuneration and additional benefits: NEXUS SCM expressly opposes any kind of dumping wages or immoral wages. Our employees' remuneration complies with local industry and labour market standards as well as minimum wage legislation. We pay employees promptly and clearly communicate the basis on which employees are paid. In particular, we ensure that all taxes and social security contributions are properly paid in accordance with the relevant legal situation. Employees must be granted all benefits required by law. Direct or indirect disciplinary measures in the form of deductions from wages will not be tolerated.

working hours: We comply with all applicable local laws regarding working hours, including overtime, rest breaks and paid vacation time. Overtime is only permitted if it is performed on a voluntary basis and falls within the permissible statutory overtime regulations (ArbZG).

data protection: We respect the privacy of all individuals and the confidentiality of any personal information we hold about them. We ensure that all personal information is kept confidential and not accessible to unauthorized persons.

health and safety at work: We are convinced that the safety and well-being of our employees are essential to our economic success. We attach great importance to compliance with our health and safety guidelines. We strive to promote the physical and mental well-being of our employees in the long term. By constantly optimizing and proactively checking our work

habits (based on BBS - behaviour based safety), we want to identify weak points, discuss possible behavioural changes with those involved and thus further reduce the rate of illness and accidents at work. We promote health as a key element for sustainable productivity and the quality of our services. With our commitment to health and safety, we create shared values. Our health and safety policy at all locations also includes the prohibition of illegal drugs, alcohol in the workplace or the consumption of drugs before and during working hours, which could negatively affect the quality and occupational safety of oneself or third parties.

5. Ethical Business Conduct:

fair competition: We are committed to the principles of the social market economy and fair competition. We conduct our business exclusively according to the performance principle and on the basis of free, unhindered competition. We only employ suppliers, agents or other intermediaries after careful and fair performance assessment.

data protection: Data protection is of great importance to our company. The confidential handling of personal data of employees, customers and interested parties as well as the protection of their integrity are governed by the European Data Protection Regulation. Likewise, technical operating data, order data, customer information and financial data are subject to confidentiality and may not be passed on for personal gain or for the benefit of third parties. Each employee undertakes to maintain confidentiality in writing. This declaration is filed in the personnel file.

intellectual property: Intellectual property rights must be respected; technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected.

Bribery, corruption, granting and acceptance of benefits: Any form of bribery or corruption is not accepted by NEXUS SCM. We have a zero-tolerance policy. Any evidence of corrupt behaviour must be reported to management. Gifts and benefits from business partners are, to a certain extent, in line with normal business practices. However, they may involve a potential conflict of interest and call into question the good reputation of NEXUS SCM. The acceptance of gifts and other benefits is therefore generally prohibited.

conflict of interest

We expect our employees to act ethically when dealing with conflicts of interest. Our employees should inform their superiors about relationships with persons or companies that could lead to conflicts of interest.

money laundering: NEXUS SCM expects all employees and business partners to strictly comply with all anti-money laundering laws and regulations.

export control and economic sanctions: The NEXUS SCM operates in compliance with the criteria for export controls and in compliance with the existing economic sanctions in order to ensure safe trade. The NEXUS SCM rejects trade outside of these regulations.

complaint management: The NEXUS SCM has implemented a documented complaint management system for individuals, companies and other communities who may be affected by negative impacts (e.g. violation of human rights, discrimination...). We encourage our employees to report suspected violations of the rules set out in the Code of Conduct. When violations are reported, we take appropriate measures to ensure proper resolution. The complaint management process as such is subject to regular review.

counterfeit parts: Our clients have their goods transported through the NEXUS SCM. It is important to us to ensure that customer property is handled carefully within our own control area and to prevent unauthorized access/exchange. Internally defined measures prevent counterfeit parts from being put into circulation while in our custody (transport or handling). These security measures must also be implemented and ensured by the suppliers we use.

Whistleblowing: Confidentiality is paramount. Unless prohibited by local law, reports and/or investigations may be made anonymously. All information and the identity of the person reporting the violation will only be disclosed to those responsible for assessing and investigating the situation and taking appropriate action, as strictly necessary for further action. If employees wish to remain anonymous, the Code requires them to report illegal or unethical conduct, unless local law requires otherwise.

protection against retaliation: Retaliation Will Not Be Tolerated We take our commitment to comply with the Code very seriously. Retaliation against an individual who makes a good faith report of a suspected Code violation will not be tolerated. Our Code specifically prohibits any member of our company from being discriminated against or retaliated against for reporting a violation or participating in an investigation. Anyone who retaliates against an individual who reports misconduct will be subject to disciplinary action, up to and including termination. No individual shall be discriminated against, terminated, suspended, threatened, stalked, coerced or intimidated because of a good faith report of unethical conduct or participation in an investigation of Code violations.

6. Ecological Responsibility:

Natural resources are being exhausted, habitats are becoming increasingly scarce, and people are damaging nature more and more every day. The first priority of NEXUS SCM is to achieve sustainable growth through the development of environmentally friendly business processes and projects.

The focus of the NEXUS SCM is on the following core topics:

- reduction of CO2 emissions
- Strict avoidance of soil and groundwater contamination
- Responsible consumption of raw materials and natural resources
- Responsible energy consumption/efficiency
- Raising awareness about the generation/prevention/disposal of waste
- reducing land use and promoting biodiversity
- Responsible Chemicals and Dangerous Goods Management

7. Code of Conduct for Suppliers of NEXUS SCM:

We have defined a code of conduct for our suppliers. The rules of conduct defined therein describe our expectations of our suppliers. By signing this document, the supplier undertakes to act responsibly and to adhere to the principles/requirements listed. The supplier confirms that it effectively communicates the content of this code to employees, agents, subcontractors and suppliers and ensures that all necessary precautions are properly implemented.

8. Training:

We inform and communicate this policy to our employees and partners. We offer our employees and partners specific training on human rights issues. All new employees are instructed on the rules of conduct.

9. Monitoring Code of Conduct:

The NEXUS SCM Code of Conduct is implemented at company locations and must be observed by all employees. If employees identify risks or deviations, they must report them to their direct supervisor or via the “mailbox” complaints management system.

In addition, an annual risk assessment is carried out in each department by the responsible department head.

protection of the whistleblower: NEXUS SCM does not tolerate any action against anyone who reports actual or suspected violations of the Code of Conduct (see also the Protection from Retaliation section). However, we also reserve the right to take disciplinary action against employees who knowingly make false allegations.

Consequences: In the event of violations of laws or internal guidelines, labour law and disciplinary measures will be taken in the interest of our employees and business partners as well as society. In addition, violations of applicable law can result in civil or criminal consequences.

More information: If you have any questions or need further information, please contact the Human Resources Department or Management Representative.