

Policy

Ethics & Compliance

The deugro group is committed to the highest standards of ethical business conduct and integrity. These standards are mandatory and must be followed at all times by our employees and business partners.

It is deugro group policy that the organization, its people, and its business partners comply with all laws and regulations that are applicable and minimize the risk of non-compliance. Any kind of unethical business conduct is incompatible with the principles of transparency, integrity, professionalism, responsibility, and ethics and will not be tolerated.

Our commitment is lived top down from our CEO, Executive Board and Senior Management, and by each employee worldwide. Our policy is based upon, while not limited to, the United States Foreign Corrupt Practices Act (1977), the UK Bribery Act (2010) and the principles set forth in the United National Global Compact

Our corporate Code of Ethics & Compliance and Anti-Corruption Compliance Policy have been implemented and built upon the following essential pillars of ethical conduct, which must be complied with at all times:

- **Anti-corruption & improper payments.** The deugro group takes a zero-tolerance approach to corruption. Any kind of bribery or facilitation payment is strictly forbidden. Rules regarding the provision of gifts and hospitality, charitable donations, and political contributions inform our commitment to antibribery and corruption and must be followed at all times.
- **Security.** Following the “trust but verify” principle, we monitor operations in our Transport Management System electronically on a 24/7 basis. Business partners are screened against applicable sanction list databases, ensuring that our business is always protected.
- **Business relations.** Ethical business practices are reinforced by providing guidance for employees on essential topics such as competition, anti-trust, conflicts of interest, handling confidential information, data privacy and trade controls.
- **Good workplace.** A first-class work environment is a key condition to economic success. The deugro group does not tolerate any kind of discrimination or harassment in the workplace. Specially trained Local Ethics Officers are available at all office locations to provide guidance, assistance, and a personal reporting channel for our employees.
- **Speak up.** It is mandatory for deugro group employees and business partners to report actual or potential violations of the law, Code of Ethics and Compliance, or this policy. Reports must be made by email, phone call or in person, to either a line manager, Branch Manager, Local Ethics Officers onsite or the Compliance Officer. Reports may be made anonymously; however, our non-retaliation policy guarantees that no one need worry about speaking up.
- **Transparency.** Every employee is required to acknowledge the deugro group Code of Ethics and Compliance and Anti-Corruption Compliance Policy on a yearly basis. Regular circulars and updates regarding our compliance program must be read by employees, officers and directors to fulfil our strategy of “living compliance”.

Any breach of this policy will result in disciplinary action, which may lead to the immediate termination of an employment contract or business partner relationship. Violations may also result in a criminal offence, possibly resulting in imprisonment and fines for the individual involved.

The deugro group works with business partners that are supportive of and committed to our Code of Ethics & Compliance and working with the highest standards of business ethics.

This policy first took effect in December 2014 and is reviewed annually.

Klaus Strahmann
Co-CEO

Hanau, November 2025