

CODE OF CONDUCT

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1. Scope

This Code of Conduct primarily deals with the question „How do we want to work?“. The rules and standards of conduct described therein apply without exception to all managing directors, executives and employees of the cargo-partner group as well as directly and indirectly held affiliates. It also applies to people who are equated with our employees, such as temporary staff. The commitment to ethical behavior is based on reciprocity between the company and each individual. The Code of Conduct must be followed by each employee, who in return may trust in the adherence of these rules towards him. This includes all official business matters as well as those in which the employee is perceived as representative of cargo-partner and is especially true for social media.

The Code of Conduct defines minimum standards that apply uniformly to the entire cargo-partner group. If foreign subsidiaries deviate from these due to national particularities when implementing the Code of Conduct, they must notify Corporate Compliance thereof in writing. The present document seeks to be a global standard for compliance with legal standards and obligations on the one hand and our value judgments on the other hand, and to assist employees in their actions. Only through compliant behavior and the integration of main behavior patterns in our daily processes and activities, we achieve compliance and thus form the basis for even stronger and more sustainable business relationships. Partners with whom we cooperate are required to comply with all applicable compliance rules. If business relationships are based on competing clauses, we seek to act in accordance with our behavioral norms or no business relationship is established.

All further internal regulations, which can also take into account industry or country-specific circumstances, are drafted on the basis of the principles of this Code of Conduct.

2. Behavioral norms in detail

I. Behavior in dealing with third parties

Integrity and ethical behavior is indispensable in order to sustainably survive on today's market. We abide by all relevant laws and regulations and act as we would expect others to do in situations where such rules don't exist: **Integer, honest, fair, responsible and respectful**. We treat our customers and business partners the way we want to be treated.

1. Conflicts of interest

A conflict of interest occurs when an employee's obligations and interests when acting on behalf of cargo-partner conflict with his or her personal interest. It is crucial that employees conduct business activities in the best interest of cargo-partner, therefore we expect our employees to avoid actual or potential conflicts of interest. This includes all relationships with customers, suppliers, competitors or private individuals that may influence cargo-partner decisions.

We always act objectively and do not let our decisions be influenced by private interests or personal relationships. Criteria for a factual decision include price, quality or the existence of a grown, fair cooperation. Personal monetary or non-cash benefits must never be grounds for concluding a contract or affecting the continued existence or termination of a business relationship. cargo-partner encourages every employee to volunteer, provided that such activity is compatible with the fulfillment of the contractual obligations to cargo-partner and applicable labor law.

In the event of an actual or potential conflict of interest, the affected employee must immediately contact his line manager and/or the Corporate Legal Department to jointly work out a solution.

1.1. Conflicts of interest from secondary employment

We may not engage in paid or unpaid secondary activities, as long as substantial interests of the cargo-partner group could be impaired. Monetary secondary employment must be reported to the responsible HR Business Partner and can be prohibited if the company sees its material business interests affected. This also includes supervisory or service activities in non-group entities or independent secondary activities.

1.2. Private investments

In case an equity investment in business partners is made by our employees or one of their related relative (spouse, partner, children, siblings, parents), this must be disclosed and notice thereof has to be given to the respective superior.

1.3. Conflicts of interest due to personal ties

Close relationships (spouse, partner, children, siblings, parents) to potential business partners must be reported to the respective superior at the latest at the beginning of contractual negotiations.

1.4. Employment of related parties

There must be no direct or indirect reporting relationship between related parties employed by cargo-partner. This refers to all stages of employment, from the time of appointment and if the relationship develops after joining the company. Appointing or keeping related parties in the same branch, even if there is no direct or indirect reporting relationship, should always be carefully considered. Appointments and all other aspects of the employment must always be based on qualifications, performance, skills and experience.

2. Ethical business practices

Decisions are made in individual cases on the basis of factual criteria. We deliberately refrain from dependency relationships or counter-sales according to the motto „You scratch my back and I'll scratch yours“.

Invitations by our business partners are only accepted in accordance with our General Directive “Anti-Corruption”. A commercial purpose must always outweigh pleasure. The invitation or gift must also be appropriate for the business partner and the invited person as well as their hierarchical position and must not exceed the scope of usual hospitality.

3. Fair competition

It is essential for cargo-partner to be confident that every employee acts in accordance to antitrust and trade laws, pricing, competition and consumer protection laws in order to avoid potential penalties. cargo-partner does not tolerate any unfair agreements with business partners or competitors, such as price fixing, secret agreements on products and services or the distribution of markets. Even acts that create the appearance of such are stringently to be avoided. In case of uncertainty or doubt, it is the duty of every employee to involve the Corporate Legal Department.

4. Corruption and Bribery

In our decisions, we always act objectively and are not influenced by private interests or personal relationships. Criteria for factual decisions include price, quality or the existence of a grown, fair business relationship. Negotiations and decisions are not promoted by small gifts or other illegal acts. cargo-partner makes all decisions with integrity and honesty.

We are interested in sustainable business partnerships as part of our success. The maintenance of such partnerships, however, does not operate in legal gray areas, nor is it carried out with improper means. Employees of cargo-partner neither directly nor indirectly accept bribery nor do they make such an offer themselves. Special care is taken in the context of government agencies or authorities and their employees, so-called “public officials”, since here the elements of the criminal offence of “sweetening” is quickly fulfilled.

Public officials within the meaning of the anti-corruption laws are among others:

- Officials or employees of a government or ministry, authority or other governmental entity
- Employees of companies that are more than 50% state-owned or more than 50% controlled by the state
- Directors or employees of an international organization
- Persons who act within a public office for a government or on behalf of a government, authority or international organization
- All political parties, party officials or candidates for political office
- Judges or other judicial staff
- Arbitrators
- Immediate family members of the above persons

5. Gifts, entertainment and invitations

Our organization strictly prohibits the offering, giving, requesting or accepting of gifts, hospitality or invitations that could be construed as an attempt to influence business decisions or gain unfair advantage. This applies, among other things, to cash, gifts, travel, food and entertainment.

All employees are obliged to report gifts or invitations received or offered by them that exceed a nominal value of 100 euros per person in order to ensure transparency and accountability.

Exceptions may be made for customary business gifts and entertainment that are reasonable and appropriate and consistent with local laws and cultural norms. Such exceptions may generally be made as part of a local or regional directive, provided they have been pre-approved by Compliance HQ, or on a case-by-case basis. Such individual case approvals can be granted by the respective MD up to EUR 1,000. Above EUR 1,000, such authorization also requires the approval of the local/regional Compliance Manager.

The organization reserves the right to refuse or return gifts that do not comply with this regulation.

Everyday examples:

- An employee receives a gift package from a supplier as a thank you for many years of cooperation.
- A manager is invited to a sporting event by a potential business partner.
- During the Christmas period, several employees receive small gifts (such as chocolate or calendars) from various business partners.
- An employee receives an electronic device as a birthday present from a customer.
- An employee is invited by a software provider to attend a specialist conference, including payment of travel and accommodation costs.

6. Market restrictions

We always act in accordance with all relevant national and international customs laws as well as foreign trade, anti-terrorism and embargo regulations. All employees are required to comply with restrictions and prohibitions on foreign and domestic trade of regulated goods, services or technologies.

In general: Ask! Ask until all your doubts have been eliminated. If there is no clear legal possibility, involve the Corporate Legal Department or open a ticket with our Compliance Helpdesk.

7. Donations and sponsorship

As a responsible member of society, the cargo-partner group promotes education and social issues through monetary and in-kind donations. The granting of donation follows our internal process and must always be documented.

Donations to individuals, political parties or organizations that may be associated with political parties, donations to private accounts and donations that may be detrimental to the interests or reputation of the cargo-partner group are prohibited.

Sponsorship, in contrast to donations, requires equivalent consideration in the form of advertising or customer loyalty measures. Therefore all sponsorship activities require a written contract. We only grant sponsorship, if the monetary value is underpinned by a serious purpose and if there is an appropriate ratio of sponsorship and equivalent as well as added value for cargo-partner.

8. Money laundering

Various states, including the US or the European Union, have enacted anti-money laundering regulations. Each employee is required, as far as possible, to be careful to prevent money laundering in their sphere of influence and may not, on their own or in cooperation with third parties, take any action that violates anti-money laundering provisions. This includes, in particular, the transfer of funds from criminal acts or other assets into the regular and legitimate economy.

II. Dealing with corporate assets

Assets of the cargo-partner group include both material and intellectual property. Each employee may only use them for permitted purposes and must protect them against loss, theft and misuse.

Based on the ideas and work of the people who dedicate their time to cargo-partner, inventions, patents and other know-how have been accumulated, which equal a great part of who we are today and make up a significant contribution to the continued existence of our company. Through successful knowledge management, we succeed in maintaining this added value and further building it sustainably. Our brands also have great value due to their prominence in public and as an identification feature with cargo-partner.

Each employee is therefore responsible to respect the material and intellectual property of third parties. We strictly reject any illegal collection of information.

1. Confidentiality

When we talk about confidential information, we mean among others documents, excerpts, files, financial and accounting figures, new products, ideas, strategies, customer information, personnel information, investments, processes and internal policies and procedures – all of those electronically recorded, on paper or saved on other media.

All of this information must be kept strictly confidential, regardless of the source. Under no circumstances it is permitted to forward such information to third parties without legal coverage or even to make them public. If third parties, such as suppliers or consultants, are involved, confidentiality agreements must be concluded between cargo-partner and the third party with the involvement of the respective legal department.

Information from which business secrets can be derived must only be made accessible to those employees, who need it for the performance of their tasks. Those have to keep such information safe at all times.

Each employee is required to handle sensitive or confidential data carefully and to protect them from unauthorized access by third parties.

This obligation to confidentiality shall survive any termination of the employment relationship, and shall apply for unlimited duration.

2. Company equipment and property

Warehouses, offices and workplaces are to be kept tidy and clean at all times. When using the equipment provided by cargo-partner, e.g. fixed and mobile phones, computers, company cars, etc. we always observe group-wide and local directives.

Computer equipment made available to our employees as well as data and information stored thereon are the property of the cargo-partner group. Personal use must be appropriate and kept to a minimum. Any use of computers or laptops exceeding such adequate level is prohibited.

3. Reliable communication

We value a culture of open and direct communication. It is important that we act in a transparent, timely and reliable manner. Misinformation internally to colleagues or externally to our customers or the public will not be tolerated.

Customers should have access to the information required to make a sound business decision. This can be provided through general written product information, our sales representatives or via our SPOT-platform. In the event of customer complaints, cargo-partner will endeavor to work out a mutually acceptable solution in due course.

Unclear, incomplete or careless statements can be taken out of context or misinterpreted and therefore be misused. Therefore all oral and written statements made available to the public are to be made exclusively through the respective board members, directors or authorized communication officers. This includes both classic and digital communication channels.

Employees who appear without authorization in public as cargo-partner representatives, or who could be perceived as being authorized as such, act as private individuals and must make that clear.

When communicating with supervisory bodies or authorities (e.g. police, tax investigation, prosecution, data protection authority), the Corporate Legal Department must be involved immediately.

4. Behavior in social networks (Online behavior)

Private use of social networks or platforms is not uncommon. Posts and comments on social media should be formulated so that it is clear that they reflect personal views and not those of the company, unless posted by an authorized representative of cargo-partner.

It is not permitted to post messages / statements on any subject that could be mistakenly interpreted as the standpoint of cargo-partner.

5. Transparent bookkeeping

All business activities are documented in our bookkeeping. Our employees ensure, that all business transactions are recorded completely and truthfully in our systems. It is thereby possible for independent third parties, e.g. auditors or tax authorities to gather a comprehensive understanding of our financial situation within a reasonable time. All processes and procedures are documented in

such a way, that an immediate continuation is guaranteed in case of employee fluctuation or staff failure. We comply with legal and internal retention periods as well as IT-storage requirements.

III. Working conditions

We strongly believe that human rights are fundamental rights and that they should be protected at all times. It is our policy that all people who carry out services for cargo-partner (whether directly as cargo-partner or indirectly as employee of our suppliers) must be treated decently and with dignity.

1. Diversity & Inclusion

cargo-partner recognizes and supports equal human rights and is against discrimination, differential treatment, harassment, inappropriate or unreasonable interference with work performance and similar in employment and working conditions.

Our global presence means that we have a multi-faceted and diverse employee workforce, and our global reach and local presence bring together people from a multitude of backgrounds, all with different skills and experience. We therefore know that a key word in fostering and maintaining diverse and inclusive workplaces is respect – respect for the individual and being respectful in the way we work together.

Diversity is the visible and invisible difference between people, including but not limited to gender, racial, cultural, national and occupational background, sexual preference, age, disability, religion and political opinion. It also refers to diverse ways of thinking and ways of working.

We aim to obtain a more balanced gender ratio within cargo-partner, also at senior management levels. We emphasize this focus through our recruitment and talent management practices as well as through training initiatives.

2. Alcohol and drugs at work

We are committed to a safe workplace without drugs and alcohol. In the pursuit of our activity, we often need a clear mind and quick reactions – the safety of colleagues and business partners depends on it. The consumption of legal and illegal drugs, as well as excessive medication limits the attention and performance of an employee and therefore not permitted. Compliance with occupational safety standards including our internal guidelines is a matter of course for us. Smoking is only allowed in designated areas.

3. Ensuring Health and Safety at Work

For cargo-partner, health- and safety-conscious behavior is important. A healthy physical and psychological working environment should contribute to creating job satisfaction, avoiding work-related sickness and preventing accidents at work for all employees. All employees are entitled to a safe and secure workplace where no one is exposed to unnecessary risk.

All managers are responsible for the safety of the employees, which also includes maintenance of equipment.

Safety must be ensured through appropriate instructions which must be observed. Managers must establish an understanding of essential safety measures within their area of responsibility and initiate improvements when necessary.

Although cargo-partner and its managers have the primary responsibility, all employees are also responsible for their own safety when performing their work and must therefore comply with the safety regulations and processes. This includes the wearing of the provided Personnel Protective Equipment (PPE), especially within the warehouses.

4. Working hours & freedom of association

In meeting our human rights responsibilities, cargo-partner acts in strict compliance with applicable national laws and the international standard of the ILO of a maximum of 48 hours of work per week with a rest period of at least 24 consecutive hours every seven days shall apply.

The basic right of all employees to form trade unions and employee representations and to join them is respected.

IV. Sustainability and social responsibility

1. Human rights

The UN Charter and the European Convention on Human Rights regard human rights as fundamental values, that must be fully complied by each and every one. cargo-partner expressly supports the abolition of forced labor, child labor and condemns all practices that exploit people or expose them to dangerous conditions.

Furthermore, we at cargo-partner put the principles of the International Labor Organization (ILO) or local legislation into practice, if those are more stringent.

cargo-partner is committed that no forms of modern slavery or human trafficking occurs in our business supply chain and in any part of our business. Therefore we have implemented a Supplier Code of Conduct which covers, among others, human and labor rights.

Employees must report any instance of human trafficking, forced labor or debt servitude to their country management, to Group Compliance or through the Whistleblower reporting tools (see chapter 4 Implementation of the Code of Conduct).

We provide our employees with wages and benefits that, as a minimum, comply with national laws or industry standards whichever is higher, as well as binding collective agreements, including overtime work and other premium pay agreements.

2. Environmentally sound business practices

We pursue a comprehensive sustainability strategy based on the three pillars of ecological, economic and social sustainability. Our management considers forward-thinking for future generations as an essential part of any entrepreneurial activity. This also includes compliance with applicable laws and

best practice environmental solutions. Our rigorous quality assurance process ensures that we only work with carriers, who meet the highest standards in green transportation technology. Furthermore, we support the development of fuel efficient aircraft, electric trucks and other new technologies. The efforts of cargo-partner in the areas of environmental protection are based on the international standard ISO 14001 and are audited by independent bodies at regular intervals.

3. Sustainability and environmental impact

As global provider of transport and logistics services, we are committed to take responsibility to reduce the environmental impact of the transport industry. Our strong focus on sustainability is reflected in our sustainability targets and in our support for many social and environmental projects across the globe.

It is our aim to have an open and constructive dialogue with authorities, customers, suppliers and other stakeholders about the environmental impact related to our transport activities.

Our suppliers are selected based on the criteria formulated in the cargo-partner Supplier Code of Conduct, which is distributed to our suppliers. Suppliers are required to have thorough knowledge about their own environmental challenges and should strive to choose alternatives with less environmental impact.

4. Implementation of the Code of Conduct

Every employee at cargo-partner is responsible for her/his own actions. Employees in management positions ensure that the employees assigned to them are familiar with the content of the Code of Conduct and act as role models through their own behavior.

4.1 Ask for assistance

We always treat each other with respect and promote a suitable atmosphere, that encourages open communication and direct dialogue between superiors and employees as well as amongst colleagues. An open-door policy facilitates it for employees to contact their superior or the Corporate Legal or Corporate Compliance Department when they come across difficult decisions or want to discuss confidential subjects. In Principle: Ask! And keep asking questions, until all doubts have been eliminated.

4.2. Possible sanctions

cargo-partner stands for an ambience free from discrimination and harassment. We offer a fair and open working culture in which we can discuss with each other without prejudice. In return, we expect every employee to respond if they suspect any action that could undermine trust in cargo-partner or the services we provide or harm our reputation and / or business relationship with our valued partners.

Violations of behavioral norms by individual employees can have serious personal consequences for them, are also likely to permanently damage our reputation on the market. That is why we do not tolerate wrongdoing. The executives and superiors have to exemplify our employees through lived practice.

Deliberate unlawful behavior or violations of the Code of Conduct or other internal regulation or laws are not tolerated and punished accordingly – regardless of rank and position of the person acting. Depending on the nature and extent of the violation, consequences might lead to disciplinary actions or even claims under administrative and criminal law.

4.3. Report violations

It is possible for a member of staff to become aware of violations of provisions of the Code of Conduct or other internal regulations or laws. If such misconduct has been identified or if there is reason to believe so, the employee is required to report such misconduct to the direct superior and/or the Corporate Director for Compliance & Data Protection or direct the issue via email to whistleblowing@cargo-partner.com or send a physical letter to Corporate Internal Audit (address: cargo-partner d.o.o. Beograd, Ugrinovacka 205, 11272 Beograd, Serbia), use the [Whistleblowing Software](#) on the start page of the Intranet, use the cargo-partner website in the category “[Company/Environmental-social-and-governance/governance/whistleblowing](#)” or use the telephone line **+381 63 59 11 46** (Bogdan Matovic – Head of Corporate Internal Audit), available from 8am to 6pm (GMT+2).

cargo-partner commits to carefully investigate all incoming indications and treat them confidentially on request. Employees who report violations or misconduct will not suffer negative consequences of any kind whatsoever. This also applies to persons who contribute important information for

elucidation of the facts. Intentional or grossly negligent false accusations, however, entail disciplinary actions against the initiator.

5. Decision tree: Is my decision compliant?

The following questions offer assistance in everyday business:

- Is my decision legal/compliant?
- Is my decision consistent with the cargo-partner Code of Conduct?
- Is it ethical?
- Would it be acceptable for cargo-partner or myself to have my decision published?
- Can I tell my superiors, colleagues, family or friends what I have done with a clear conscience?

If you can answer all of the questions above with a clear „YES“, proceed. If you answered „NO“ to any of these questions or are unsure, do not proceed! Talk to your superior or the Corporate Legal or Compliance Department to get advice.

Managers ensure that the employees assigned to them are familiar with the content of the Code of Conduct, observe the rules applicable to them at all times and set an example for their employees through their own behavior.

6. Responsibility and review mechanism

- 6.1 The responsibility for this directive is with the Corporate Director for Compliance & Data Protection. He/she is also responsible to oversee the proper implementation of and adherence to this directive within the organization. This includes the responsibility for the development and conduction of adequate trainings for all employees.
- 6.2 This directive will be regularly updated by the Corporate Director for Compliance & Data Protection or his/her appointee. As a minimum, this directive has to be reviewed once a year. All changes will be made visible to all employees in the cp Process House and important changes actively communicated to all cargo-partner employees worldwide.

7 History

Issue	Date	Processed by	Description of amendment
01	Jan. 2019	Matthias Niederhuber	First Edition
02	22.06.2020	Michael Hietler	Annual review / no content change
03	28.06.2021	Michael Hietler	Annual review / no content change
04	14.12.2021	Michael Hietler	Page 11 new email address for whistleblowing
05	23.05.2022	Michael Hietler, Claudia Elvers	Annual review and content update due to new topics and external demand, DCR-929
06	25.10.2022	Jelena Simic	Page 12 - added telephone number for whistleblowing, DCR-1047
07	01.12.2022	Claudia Elvers	Chapter IV / 1. added last paragraph, DCR-1103
08	17.11.2023	Nicolas Nagel	Updates regarding gifts and benefits in chapter 3, DCR-1435
09	04.12.2023	Nicolas Nagel	Updates regarding gifts and benefits in chapter 3, DCR-1452
10	11.11.2024	Nicolas Nagel	Yearly review, Update chapter 1, 4 + 5, chapter 6 added, DCR-1857
11	30.01.2025	Nicolas Nagel	Removed chapter 1 (Introduction), new coverpage, DCR-1857