

Code of Ethics



Introduction

Our Code of Ethics is based on the principles of the UN on human rights, the declarations and recommendations of the ILO (International Labour Organization) and the contents of the UN Global Compact. These principles apply to all individuals who are part of the Innofreight team as employees or who engage in a business relationship with Innofreight.

Innofreight and its business partners have a responsibility to adhere to and implement these principles in their global business practices.

Table of contents

1. Diversity	4	3. Laws and moral concepts	5
1.1. Respect for human rights	4	4. Competition and corruption	5
1.2. Equal opportunities, equal treatment and non-discrimination	4	4.1. Competition and antitrust law — fair competition	5
1.3. Prohibition of workplace bullying and sexual harassment	4	4.2. Corruption and gifts	5
1.4. Prohibition of child labour and forced labour	4	4.3. Donations and sponsorship	5
1.5. Respect and language	4	5. Management	6
2. Working conditions and supply chains	4	6. Data protection and company property	6
2.1. Working environment	4	6.1 Data protection	6
2.2. Environmental and energy policy	4	7. Compliance, monitoring and misconduct	6
2.3. Ethics	5		
2.4. Occupational safety	5		

1. Diversity

In order to facilitate professional and innovative collaboration, we consciously promote diversity in our company. We believe that a wide variety of individuals and cultures ensures successful cooperation.

1.1. Respect for human rights

We recognise human rights, based on the UN Convention on Human Rights, as our core values, which must be respected and upheld by all our employees. We do not tolerate any form of discrimination or harassment. Our employees are under an obligation to report violations of the law and this Code of Ethics to their supervisor.

1.2. Equal opportunities, equal treatment and non-discrimination

At Innofreight, every individual has the same opportunities, regardless of age, faith, religion, skin colour, nationality, ethnic origin, political and other beliefs (unless prohibited by law), gender, sexual orientation, disability, marital status, or similar considerations. We offer all individuals the same basic conditions and treat them equally within this general framework. We embrace diversity on the basis of equality and communicate this principle externally in our corporate policy.

As a technology-based enterprise, we place particular emphasis on employing women in our company, and on increasing the proportion of women in technical professions. The work-life balance is continuously improved and is a key aspect of our active corporate culture.

1.3. Prohibition of workplace bullying and sexual harassment

We do not tolerate workplace bullying or sexual harassment in any form. This includes demeaning comments, inappropriate humour, suggestive gestures and the like. However, in the event of inappropriate or offensive behaviour, we recommend the following guidelines.

<https://www.antidiskriminierungsstelle.de/EN/homepage/homepage-node.html>



1.4. Prohibition of child labour and forced labour

Child labour and forced labour are unacceptable under any circumstances and must be prevented without exception. This also applies to all customers and suppliers as well as all business and cooperation partners of Innofreight.

1.5. Respect and language

Every individual is jointly responsible for maintaining a good working atmosphere. We treat each other with respect, regardless of position or hierarchy. We use sensitive, gender-appropriate language and work continuously to further improve the high standard of our communication culture.

2. Working conditions and supply chains

As an international service provider, we take care to ensure that our company and all of our customers, suppliers, business and cooperation partners are aware of our Code of Ethics and comply with these guidelines throughout the supply chain. This Code of Ethics is an integral part of all of our contractual business relationships.

2.1. Working environment

In order to create fair working conditions, the principles of the UN Convention on Human Rights and the ILO are our guiding minimum standards. Fair pay in accordance with the prevailing law is a basic principle (national minimum wage conditions).

We create a working environment that rejects discrimination, promotes respectful cooperation and focuses on the health and safety of all employees.

2.2. Environmental and energy policy

We develop efficient, competitive logistics solutions centred on transporting goods by rail. Shifting transport from road to rail reduces CO₂ emissions and makes a significant contribution to environmental protection and sustainability.

Driven by the basic concept of energy efficiency and the conservation of resources, we create and develop environmentally friendly, sustainable logistics solutions and shape the design of our working environment.

Innofreight and all of its business partners are committed to complying with the environmental regulations, guidelines and standards in force and share the goal of continuous evaluation and optimisation.

Innofreight intends to obtain ISO:50001 and 14001 certifications in 2024.

2.3. Ethics

We take responsibility for the principles we establish in this Code of Ethics and also monitor whether and to what extent these guidelines are adhered to in our dealings with our customers, suppliers, business and cooperation partners.

In the event that companies with which we do business do not comply with these guidelines and we become aware of this, we will first seek dialogue with the company concerned and insist on compliance. In the absence of a response to this notification and if no attempt is made to remedy the situation, we consider this to be a breach of contract which may result in the immediate termination of the business relationship without notice.

2.4. Occupational safety

Product safety and occupational safety are our top priorities. Our product range is characterised by ease of use and safe handling.

Innofreight intends to obtain ISO:45001 certification in 2024, in order to meet the highest standards in this area.

3. Laws and moral concepts

In all of our business activities, we comply with the laws and regulations of the countries in which we operate. In the event that mandatory national standards or other regulations differ from the provisions of this Code of Ethics, the stricter provision takes precedence in all cases. We recognise that, due to the international nature of Innofreight Group, we must comply with the legal provisions specific to each country.

4. Competition and corruption

We are committed to free and fair competition. This rules out any form of corruption. Offering, promising, demanding or accepting financial or other benefits is prohibited.

4.1. Competition and antitrust law — fair competition

We are committed to excellence, customer focus and the quality of our products. It is our corporate policy to refrain from any anti-competitive practices and to comply with relevant national and international competition and antitrust legislation. We support efforts to promote a free market and open competition worldwide for the benefit of all providers.

Anti-competitive practices harm the company's reputation and have wide-ranging legal and commercial consequences.

4.2. Corruption and gifts

Corruption is not tolerated in any form. When dealing with public officials, we do of course refrain from any action that could unlawfully influence their decisions.

We consider small gifts and tokens of appreciation between business partners to be an expression of mutual respect that serves to build and maintain long-term business relationships. The acceptance or granting of direct or indirect financial benefits is prohibited. Invitations to meals, for example, may only be accepted within the limits of customary business hospitality.

4.3. Donations and sponsorship

We embrace social responsibility and are actively involved in social, cultural, sporting and scientific projects. Donations and sponsorship services are made in strict compliance with the provisions of the law and are subject to the requirement for transparency. To ensure an overview, all donations and sponsorship services must be processed through the marketing department. The motivation for the donation and the purpose of the sponsorship are formalised in a contract and documented.

Donations are always made on a voluntary basis and must not give the impression that any form of consideration is expected in return. Innofreight does not make direct or indirect donations to political organisations, parties or politicians.

Sponsorship services are benefits that are provided in exchange for a consideration. For example, an advertising service is contractually agreed in exchange for money.

5. Management

This Code of Ethics is the cornerstone of our management behaviour: Respect for our values, integrity and fairness underpin our actions and are a constant obligation in all aspects of company management.

6. Data protection and company property

Innofreight owns extensive company and business secrets, internationally protected patents and technical know-how, as well as a broad portfolio of different types of company property.

6.1 Data protection

Data protection and confidentiality are at the heart of our business relationships and day-to-day operations.

Sensitive information of any kind obtained in the course of professional activities must be treated with the utmost confidentiality and must not be used to pursue personal interests or disclosed to third parties.

7. Compliance, monitoring and misconduct

The Code of Ethics is available to all employees and business partners at all times.

Compliance with legal regulations and guidelines is a core element of corporate responsibility and behaviour.

Avoiding violations of the law and preventing misconduct are in the common interest of our company, our employees and our business partners.

Through its whistle-blower system, Innofreight ensures that incoming information is treated with the utmost confidentiality, processed and, if necessary, action is taken.

Consequences for non-compliance with the Code of Ethics may include, but are not limited to:

- Corrective and remedial action
- Consequences under labour law
- Serious violations or failure to take appropriate corrective action result in termination of the business relationship