# **POLICY**



The Nagel-Group is one of the leading food logistics companies in Europe. More than 500 million people in Europe have to be supplied with fresh food every day. We contribute to ensuring this is possible.

We are aware of our responsibility towards our employees, customers, and business partners. We are therefore committed to the principles of responsible corporate management.

Our aim is to fulfil the needs and expectations of our customers on a daily basis with the highest level of quality and reliability. Honesty and sincerity in our dealings with our customers and employees is indispensable. Adherence to ethical, social, and ecological standards allows us to gain the unreserved trust of our customers and employees.

We commit ourselves to business integrity in compliance with the applicable laws. We have also drawn up a Code of Conduct for our employees and suppliers.

This Code of Conduct sets binding standards for quality, business ethics, and integrity and in turn is binding for the entire Nagel-Group.

The following principles shall apply to all Nagel-Group employees and service providers.

#### **Labour Standards**

We observe the principles of the "Global Compact" of the United Nations and the "ETI Base Code". Additionally, we respect the principles set out in the ILO's "Declaration on Fundamental Principles and Rights at Work", adopted in 1998, in accordance with national law and practice.

We provide for safe and healthy working conditions, and agreeable working hours. In addition, we respect the right of co-determination, value representation of interests, and ensure fair payment.

## **Health & Safety**

Health and safety is an integral part of all our operational processes. Our working environment needs to be safe and clean. The current regulations for health and safety and hygiene have to be implemented and strictly adhered to. To ensure this, measures are taken and processes are developed which minimise risks, accidents, and negative health effects.

Managers have the responsibility to set an example in this area. Safety and health at the workplace constitutes the basis of our company's success.

#### **Business Ethics**

Compliance with laws and regulations is just as important to us as lawful and trustworthy behaviour in all areas. We strictly reject all forms of corruption and are committed to fair competition and to a free market economy. We select our business partners solely on the basis of objective and unbiased criteria.

We attach great importance to an atmosphere that is characterised by openness, transparency, appreciation, and trust. The same applies to our dealings with employees, customers, business partners, and other organisations and institutions.

The protection of personal data and the data entrusted to us by customers is extremely important and therefore an integral part of our business activities.



### **Sustainability**

We have internalised sustainable action and we are committed to treating people and nature as indispensable partners. Therefore we strive to balance business and environmental interests. Sustainable action which conserves resources is inextricably linked to our DNA as a family-owned business.

In this spirit, we intend to continue to develop our high standards in order to achieve continuous improvement for people and the environment. Green Logistics and social responsibility are part of our everyday practice.

## **Continuous Improvement**

We work constantly to improve our services, structures, and processes in order to satisfy the high quality standards we have set for the long term.

The know-how and skills of each employee are the basis for this continuous improvement process. To ensure this, we interact at all levels in an open, communicative manner which is defined by mutual respect.

Every employee is called upon to report violations of laws and/or violations of ethical and moral principles to the Compliance Officer or the Nagel-Group's ombudsman. The anonymity of the whistleblower is protected. By doing this, the Nagel-Group wants to prevent that the whistleblower does not suffer any detriment when they report actual or suspected violations.

#### Additional information

Please contact Corporate Legal or the Nagel-Group's ombudsman if you need more information or have any questions. You can find the contact details under the following <u>link</u>.

## The Nagel-Group's Management Board

Frank Böschemeier (CFO)

Björn Schniederkötter (COO)

Tobias Nagel (CTO)

Gerd Neuenstein (CSO)

