



Employee Code of Conduct

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Employee Code of Conduct

The DANX Carousel Group

The DANX Carousel group of companies (hereafter The Group) is a time critical service logistics specialist with strong positions in the UK, Ireland, Netherlands, Germany, Iberia, Nordics, Baltics and Poland.

The Group of companies is the partner for all types of warehousing, time-critical, final mile and spare parts distribution solutions and with our established, warehouses and distribution networks, our mission is to create solutions for our customers through innovative and efficient logistics solutions.

Built upon tailored distribution flows and great commitment and dedication, the Group delivers exceptional aftermarket, in-night logistics solutions to a wide range of international and local organizations with a guaranteed 99% on-time final mile delivery throughout our regions, often less than 12 hours from collection from the European distribution hubs to the delivery point.

This document forms our Employee Code of Conduct which sets the minimum standards we expect our employees to uphold.

1. Laws and Ethical Standards

All employees shall comply with applicable laws and governance standards. The Group supports the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practice. This especially applies to:

Exceptional as standard

2. Human Rights, Recruitment and Fair Labour Practices

Child Labour

The Group shall not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it shall be 15 years. Workers under the age of 18 shall only perform work in accordance with legal requirements (e.g. with regards to working time and working conditions) and subject to any requirement regarding education or training.

Recruitment

The Group shall practice diversity, equity and inclusion during the recruitment process and shall have in place relevant applicable procedures and maintain these policy standards.

Forced Labour

The Group shall not use any form of forced, bonded or involuntary labour. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). The Group shall ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The Group shall be responsible for payment of all fees and expenses (e.g. licenses and levies) relating to workers, where legally required.

Punishment, mental and/or physical coercion are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to the workers.

Compensation and Working Hours

The Group shall comply with all applicable ethical recruiting national laws and mandatory industry standards regarding working hours, overtime, wages, and benefits. The Group shall pay workers in a timely manner and clearly convey the basis on which workers are being paid. Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted.

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3. Freedom of Association and Collective Bargaining:

The employees shall be free to join or not to join a union/employee representation of their choice, free from threat or intimidation. The Group recognizes and respects the right to collectively bargain in accordance with applicable laws.

4. Diversity

The Group shall promote an inclusive work environment that values the diversity and equity of its employees. The Group shall not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under law.

5. Harassment

Harassment is any improper or unwelcome conduct that might reasonably be expected or be perceived to cause offense or humiliation to another person. Harassment in any form because of gender, gender identity and expression, sexual orientation, physical ability, physical appearance, ethnicity, race, national origin, political affiliation, age, religion, or any other reason is prohibited at DANX Carousel.

Sexual harassment is a specific type of prohibited conduct. Sexual harassment is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation. Sexual harassment may involve any conduct of a verbal, nonverbal or physical nature, including written and electronic communications, and may occur between persons of the same or different genders.

6. Complaint process

A participant who feels that they have been harassed whilst working at the Group may report the matter through our Whistleblower system Safe2Whistle which is hosted and controlled by the Danish law firm Bech Bruun. The entire complaint process is managed within the Safe2Whistle system. Any complaint will be treated confidentially and will not be discussed with any other parties without consent from the employee in question. The Whistleblower system can be accessed at the following URL <https://report.whistleb.com/en/danxcarouselgroup>.

For more information on the Group's whistle blower policy please refer to the Intra-net and our Whistle Blower Policy.

7. Health & Safety

The Group strives to implement and be responsible for the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate for the business. The Group shall comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, to preserve the health of employees, safeguard third parties and prevent accidents, injuries, and work-related illnesses. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Employees are to be adequately educated and trained in health and safety issues.

8. Data Protection and Disclosure of Information

The Group shall adhere to relevant data protection and security laws as well as to respective regulations, in particular regarding personal data of customers, consumers, employees and shareholders. The Group shall comply with all said requirements when personal data is collected, processed, transmitted, or used.

The Group shall safeguard and make only appropriate use of confidential information. The Group shall not disclose any information that is not known to the general public.

Exceptional as standard

9. Bribery and Corruption

The Group shall comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations, and standards. The Group shall not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official act or to secure an improper advantage to obtain or retain business.

10. Trade Regulation

The Group shall comply with all applicable trade and import regulations including sanctions and embargoes that apply to their activities.

11. Security

The Group employees shall comply with all applicable national and international security regulations and requirements as applicable to their role and location within the supply chain.

12. Money Laundering & Financial Records

The Group shall comply with applicable laws and regulations designed to combat money laundering activities. The Group shall maintain financial records and reports according to international laws and regulations.

13. Fair Competition

The Group shall comply with applicable competition and anti-trust laws.

Exceptional as standard

14. Procurement

The Group will comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substance and conflict minerals.

Procurement of goods and services should be executed in a responsible manner. All suppliers should adhere to the standards set out in the Supplier Code of Conduct and an audit process held accordingly to ensure compliance.

We expect employees to support The Group to engage with responsible suppliers and take reasonable efforts to avoid in its products the use of raw materials, which directly or indirectly finance armed groups, who violate human rights.

15. Counterfeit parts

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, to exclude them from the delivered product, and to provide notification to recipients of counterfeit products when warranted.

Employees should ensure that these processes are maintained and discussed with suppliers where necessary.

16. Conflicts of Interest

The Group makes decisions based solely on objective criteria and do not allow themselves to be guided by personal interests or relationships.

17. Environment

The Group shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

The Group shall practice the highest standards regarding the management of sustainable resources for waste reduction for the protection of local water quality, preventing pollution through a certifiable chemical management and waste oil protocol.

The Group encourages the use of environmentally friendly technologies and supporting environmental initiatives across all areas of business.

The Group has set environmental targets which are listed on our website.

18. Business Continuity Planning

The Group shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases). This preparedness especially includes disaster plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations.



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