



Supplier Code of Conduct

APRIL 1, 2023

HEAD OF PROCUREMENT



Supplier 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.

Why we are introducing a Supplier Code of Conduct

We expect all our suppliers to adhere to the same ethical standards as we work to uphold ourselves. For this purpose, The Group has drawn up this Supplier Code of Conduct, which sets the minimum standards for doing business with any company within the DANX Carousel group.

The Group is signed up to the UN Global Compact and this guides our principles and our ESG (Environment, Social, Governance) program of work. We drive to be a sustainably driven company which is why we are aligned with the 10 UN Global Principles and are currently in the process of setting ourselves environmental targets. These targets will be listed on our website; if you would like to know more about these targets and how we are working to achieve them please visit the website.

A key part of our sustainability strategy is on ensuring we have alignment with our suppliers to maintain these exceptional levels of service. We place strong emphasis on our partners having strong sustainability policies, and these policies will also be an important factor in selecting and retaining our suppliers.

Areas that suppliers are expected to comply with:

1. Laws and ethical standards

The supplier shall comply with all laws and governance applicable to its business and respectfully shall actively encourage their stakeholders to do the same. The supplier should support 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.

2. Human rights, Recruitment and fair labour practices

In all human rights and fair labour practices the supplier must comply with country specific laws and ensure full visibility on human rights. They shall practice diversity, equity and inclusion during the recruitment process and shall have in place relevant applicable procedures and maintain these policy standards. If the Group requests evidence of these practises at any time the supplier must be able to provide evidence, they are compliant.

Child Labour

The supplier 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.

Forced Labour

The supplier 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 supplier 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 supplier 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 supplier shall comply with all applicable ethical recruiting, national laws and mandatory industry standards regarding working hours, overtime, wages, and benefits and any daily allowances. The supplier 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.

3. Freedom of association and collective bargaining

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

4. Diversity

The supplier shall promote an inclusive work environment that values the diversity and equity of its employees. The supplier 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.

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.

It is expected that suppliers work to prevent harassment in any form in their operations.

6. Complaint processes

We will support all who report violations as well as those who request assistance or have concerns. If you detect or suspect any concerns or illegal or unethical business behaviour you can report it to us via our whistle-blower system. This policy and process can be found on our website which explains it in more detail.

7. Health and safety

We expect our suppliers 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 supplier 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. The suppliers employees or persons working on their behalf are to be adequately educated and trained in health and safety issues.

8. Data protection and disclosure of information

The supplier 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 supplier shall comply with all said requirements when personal data is collected, processed, transmitted, or used.

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

9. Bribery and corruption

The supplier shall comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations, and standards. The supplier 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 supplier shall comply with all applicable trade and import regulations including sanctions and embargoes that apply to their activities.

11. Security

The supplier shall comply with all applicable national and international security regulations and requirements in relation to the transport of freight within the supply chain.

12. Money laundering and financial records

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

13. Fair competition

The supplier shall comply with applicable competition and anti-trust laws

14. Procurement

We expect our suppliers to comply with regulatory laws and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals.

We expect our suppliers to work closely with us to support us and take reasonable efforts to avoid in its products the use of raw materials, which directly or indirectly finance armed groups or who may contribute to human rights violations.

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.

We expect our suppliers to maintain a clear understanding of the Red List countries and not to trade with them or provide goods procured through those countries.

16. Conflicts of interest

A conflict of interest arises when an individual has a private/personal interest which could appear to influence their decisions. Such conflict-of-interest situations include a relationship by blood or marriage, partnership, business partnership or investment. The supplier shall disclose any actual or potential conflict of interest with DANX Carousel group personnel.

17. Environment

The supplier 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.

We expect our business partners to strive to support DANX Carousel group's sustainability requirements through the products and services they deliver. In this regard, we also expect our suppliers to take climate protection appropriately into account in their own operations, for example by proposing and executing in concert with The Group, steps to reducing GHG emissions, decarbonisation and protecting air quality and for the transition to renewable energy sources where it is deemed feasible and available and to take steps to improve energy efficiency to reduce the use of fossil fuels year over year.

The supplier should support environmental initiatives where appropriate and encourage the use of environmentally friendly technologies which support their business.

The supplier 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 supplier should ensure they have appropriate reuse and recycling in place throughout their supply chain.

18. Business continuity planning

The supplier 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.

Compliance with the Supplier Code of Conduct

The DANX Carousel group reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. DANX Carousel group encourages its suppliers to implement their own binding guidelines for ethical behaviour. Procurement of goods and services should be executed in a responsible manner and suppliers tier-1 suppliers providing goods or services directly or indirectly to The Group should adhere to standards outlined in this Supplier Code of Conduct

Any breach of the obligations stipulated in this Supplier Code of Conduct is considered a material breach of contract by the supplier and The Group expect that the supplier shall take necessary corrective actions in a timely manner. In the event that the expectations of this Supplier Code of Conduct are not met, the business relationship may be reviewed and corrective action will be conducted which could lead ultimately to the termination of contract relationship.

Review and revision of Code of Conduct

Reviewed and revised annually for compliance to the content or as required if changes to legislation apply sooner. Original version April 2023 Last review 01.2025 - no revisions applied.



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