



**HEGELMANN**  
DEUTSCHLAND

# CODE OF CONDUCT

## FOR EMPLOYEES



Integrity. Respect. Responsibility. Our shared values.

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# INTRODUCTION

The Hegelmann Express GmbH Employee Code of Conduct (“Employee Code”) is founded on our company's philosophy, vision, and core values. It establishes the standards of behavior expected from every employee – within their teams, in interactions with customers and business partners, and as representatives of Hegelmann in society.

At Hegelmann Express GmbH (“Hegelmann”), we are committed to maintaining the highest level of professionalism, ethical behavior, and responsible business conduct. These principles form the basis of our reputation and long-term success. Each employee contributes to upholding these standards through their actions, decisions, and daily work.

The Employee Code provides clear guidance on ethical conduct, lawful behavior, and responsible decision-making. It supports a respectful, safe, fair, and inclusive working environment and ensures that our operations comply with all applicable laws and regulations in every country where we operate.

The purpose of this Employee Code is to:

- Define clear norms and rules of conduct for all employees.
- Inform and educate employees about ethical behavior and business conduct.
- Strengthen engagement and motivation by promoting responsible actions.
- Encourage personal accountability in daily work activities.
- Ensure a positive and motivating work environment aligned with our philosophy, vision, and values.
- Promote respectful and trust-based relationships, supporting the timely and constructive resolution of issues within the company.

# OUR VALUES AND PHILOSOPHY



## FAMILY

Hegelmann is and has remained a family-run company. We see ourselves as one big international and multicultural family with common goals and values.



## RESPECT

Respect is one of the pillars of our organization. We accept that we are all different and yet belong together. Our interaction is defined by politeness, openness, and honesty.



## SUSTAINABILITY

Sustainability in everything we do is our top priority. We create sustainable people management practices for our employees and treat the resources we need for our processes with care, using renewable solutions where they are available.



## PROGRESS

Progress is our collective ideal that we strive for by working to ever higher standards. We continuously develop our service structures and use technologies as the key to success in all business processes.



## MOTIVATION

Our daily motivation is cooperation and the satisfaction of our customers. We have the vision to offer our global services in the best possible quality. We are always looking for new ways – we either win or we learn!

# OUR VISION AND MISSION

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## OUR VISION

Hegelmann Express GmbH is and remains a family-driven company shaped by strong values, responsible leadership, and a global mindset. We see ourselves as an intercontinental logistics organization that combines international reach with local expertise, delivering a broad and evolving portfolio of services grounded in land transportation.

We are committed to sustainable and profitable growth, continuously expanding and diversifying our services to strengthen our market position.

By investing in green technologies, intermodal solutions, and environmentally friendly transport concepts, we actively support the climate goals of the European Union.

Our financial stability is driven by efficient cost management, a strong presence in key markets, and the continuous improvement of our operational and service capabilities.

We aim to be an employer of choice—offering flexibility, development opportunities, and long-term success within a dynamic, medium-sized organization.

Digital transformation is a fundamental pillar of our progress. Through advanced digitalization and automation, we ensure that our processes are efficient, reliable, and fully transparent.

We work with passion, responsibility, and commitment—qualities that drive our ongoing success on the global stage.

## OUR MISSION

*...is to deliver comprehensive  
logistics solutions that adapt seamlessly to the pace,  
expectations,  
and requirements of our clients.*

# ROLES AND OBLIGATIONS

## Responsibilities of All Employees

All employees of Hegelmann are expected to:

- Be familiar with Hegelmann's philosophy, values, and vision and reflect them in their daily work.
- Understand and comply with the Employee Code of Conduct and promptly report any suspected violations or unethical behavior.
- Possess the relevant professional knowledge, skills, and awareness required for their role and continuously strive to improve them.

As a European road transport provider, we strictly adhere to the EU Mobility Package regulations. This includes ensuring that our drivers are granted the right to return to their place of residence or the company's operational center at regular intervals. We also ensure full compliance with the 'Posting of Drivers' rules, guaranteeing that employees are compensated in accordance with the host country's labor laws and social standards when performing cross-border transport operations.

## Responsibilities of Managers and Designated Responsible Persons

Every senior manager – or any person assigned specific responsibility – is required to:

- Ensure that all team members have full access to the Employee Code of Conduct, understand its principles, and are familiar with the company's core anti-corruption rules.
- Establish and maintain appropriate measures, processes, and controls to create a work environment free from discrimination, harassment, bullying, bribery, and corruption.
- Clearly communicate expectations, responsibilities, and performance requirements to employees.
- Provide relevant training, guidance, and development opportunities to support employees in fulfilling their roles responsibly and professionally.

# PRINCIPLES OF THE CODE OF CONDUCT

## Honesty and Integrity

Employees shall act honestly, transparently, and in full compliance with applicable laws and regulations. Every employee is responsible for protecting the reputation and interests of Hegelmann through reliable, ethical, and trustworthy behavior.

Honesty includes:

- fulfilling commitments and delivering on promises;
- avoiding any form of fraud, deception, or manipulation;
- ensuring that working time, company materials, and financial resources are used exclusively for legitimate business purposes;
- supporting the development of employee skills, qualifications, and equal opportunities in the workplace.

## Respecting the Law and Human Rights

All employees must treat colleagues, customers, and business partners with fairness, dignity, and respect. Discrimination of any kind is strictly prohibited. No person may be disadvantaged based on age, gender, social status, race, religion, nationality, political views, sexual orientation, disability, or family circumstances.

Employees shall:

- uphold and defend human rights and take appropriate action when violations are identified;
- ensure that colleagues who report issues under the whistleblowing procedure are protected from retaliation, penalties, or unfair treatment;
- comply with statutory working time regulations and ensure that employee health and safety are never compromised;
- ensure wages comply with minimum legal requirements and that compensation is never withheld or reduced for disciplinary purposes.

## Responsibility and Accountability

Employees must understand the company's obligations toward shareholders, customers, colleagues, and business partners. All tasks must be carried out diligently, efficiently, and with the necessary expertise.

Responsibility includes:

- Understanding the company's obligations and interests towards shareholders, customers, employees and business partners.
- Carrying out tasks with diligent, efficient and comprehensive use of skills, understanding the significance of tasks and duties.
- Recognising the consequences of professional activities based on personal responsibility in relation to decisions and performances, minimizing the potential benefit or harm caused by short or long-term effects.
- Taking responsibility for one's own work and decisions.
- Taking joint responsibility for collegial decisions.

## Exemplary behavior

Every employee is expected to act as a role model by demonstrating professional conduct in appearance, language, and behavior.

This includes:

- demonstrating tolerance, willingness to help, and respectful communication;
- resolving conflicts calmly and constructively;
- using working time efficiently and completing tasks competently and on schedule;
- refraining from insulting, disrespectful, or inappropriate behavior, including harassment or vulgar language;
- abstaining from the consumption, possession, or influence of alcohol, drugs, or other intoxicating substances during working time.

## Dress Code and Professional Appearance

Employees are expected to present themselves in a clean, neat, and professional manner at all times. Clothing and appearance must reflect the professional image of Hegelmann and be appropriate to the duties performed.

Requirements include:

- a high standard of personal hygiene;
- clean, well-maintained clothing;
- appropriate footwear (flip-flops are not acceptable);
- avoiding overly revealing clothing such as short miniskirts, shorts, crop tops, low-cut tops, or vest tops;
- refraining from displaying offensive logos or messages;
- ensuring that visible body modifications (piercings, tattoos) do not cause offense;
- wearing uniforms or protective equipment provided by the company when required;
- carrying ID badges in offices and at external events.

## Neutrality, Objectivity, and Fairness

Employees must act impartially and evaluate colleagues, partners, and situations based on objective criteria.

This includes:

- assessing performance, competence, and capabilities fairly;
- basing decisions on facts, measurable indicators, and expert assessments rather than personal opinions or emotions;
- promoting cooperation, initiative, openness, and constructive compromise.

# STANDARDS OF ETHICS AND CONDUCT

## Relationship with customers

Hegelmann is committed to continuous improvement in all areas of its operations. Customer satisfaction is essential to our success, and every employee shares responsibility for maintaining high service quality and professionalism.

We respond to customer inquiries, complaints, and feedback promptly, accurately, and respectfully.

Our reputation is built on reliable performance, transparent communication, and the consistent delivery of high-quality services.

Employees are expected to act in a courteous, solution-oriented manner at all times and to represent the company with professionalism in every customer interaction.

## Relationship with suppliers

Hegelmann strives to be a reliable and trustworthy partner.

We focus on building long-term, fair, and transparent business relationships with suppliers who share our values and standards.

We expect our suppliers to comply with international human rights principles, fair working conditions, environmental protection requirements, and anti-corruption regulations. We encourage them to conduct their operations in line with the ethical principles outlined in this Employee Code and other applicable corporate guidelines.

Supplier selection and evaluation are performed based on objective and predefined criteria, including:

- quality and reliability
- price and performance
- compliance with environmental and social standards
- integrity and cooperation

Compliance with these principles may be verified through regular spot checks and audits.

## Relationship with competitors

Hegelmann is committed to fair, transparent, and lawful competition in all markets in which we operate.

The company does not engage in spreading negative or misleading information about competitors in order to obtain an unfair competitive advantage.

We compete ethically, in accordance with all applicable competition laws and the principles of business integrity. Our competitiveness is increased through continuous improvement, efficient management, higher productivity, and responsible cost optimization – not through unethical practices.

## Relationships Within the Company

Hegelmann is committed to upholding international human rights standards and to treating all employees with dignity and respect. Our principles are guided by the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO).

Within the company, the following principles apply:

### Human rights and fair treatment

- The company does not tolerate child labor, forced labor, or any form of involuntary work.
- All employees must be treated equally and objectively. We strive to maintain a work environment in which individuals are respected regardless of their personal characteristics, abilities, or differences. No employee or candidate may be discriminated against in any way.
- Harassment, intimidation, discrimination, or any form of inappropriate behavior is strictly prohibited.

### Safety, health, and workplace integrity

- The company continuously develops and improves a safe and healthy working environment, prevents potential harm, and complies with all legal occupational safety requirements.
- When carrying out duties, employees must share all information relevant to their colleagues' tasks. They may not obstruct another employee's work or create situations in which confidential information must be disclosed to unauthorized persons.
- No employee shall be required or incentivized—through bonuses or otherwise—to bypass legal driving limits, skip mandatory rest periods, or exceed speed limits. We actively promote fatigue management and provide resources for mental health support, acknowledging the unique pressures of the long-haul transport environment.

### Confidentiality and cooperation

- Employees must follow principles of integrity, goodwill, and cooperation.
- Confidential or sensitive information may only be shared with authorized individuals and only when necessary for work purposes.

### Support for Freedom of Association

Hegelmann respects the right of all employees to form or join trade unions or other organizations of their choice and to engage in collective bargaining without fear of retaliation, harassment, or intimidation. The company is committed to maintaining a constructive dialogue with employee representatives and ensuring that their activities are conducted in accordance with national laws and international labor standards.

## Behavior that must be avoided

The following behaviors are strictly prohibited in relationships between colleagues:

- Humiliating, insulting, degrading, or disrespectful treatment.
- Public discussion of an employee's personal characteristics, behavior, or reputation.
- Devaluing colleagues' work or property.
- Spreading rumors, defamation, or gossip.
- Creating conflict, exploiting professional or psychological advantages, or promoting discord.
- Demonstrating persistent negative or disruptive behavior.

## Manager Responsibilities

Managers must always treat employees with respect and provide instructions in a constructive and professional manner. Their responsibilities include:

- Maintaining a functional, supportive, and conflict-free work environment.
- Addressing and resolving disagreements promptly and fairly.
- Avoiding public displays of favoritism or antipathy toward employees.
- Ensuring objective evaluation of employee's performance, skills, and competencies.

## Additional Duties of Senior Employees

Employees in leading roles have extended responsibilities, including:

- Exemplary behavior: acting as role models for integrity, professionalism, and correct conduct.
- Providing constructive feedback to support employee development.
- Ensuring qualifications and competence within their teams by offering appropriate guidance, training, and development.
- Supervising employees, including temporary staff, to ensure compliance with laws, internal rules, and this Code of Conduct.
- Reporting potential violations of laws, internal regulations, or this Code to their superior or the managing director.
- Supporting employees who raise concerns in good faith regarding compliance, ethics, or workplace issues. No employee shall ever face retaliation for asking questions, reporting concerns, or participating in investigations.

## Confidentiality and Data Protection

Employees must protect the privacy of all confidential company matters, including trade secrets, customer lists, pricing strategies, and internal financial data. This obligation applies to information marked as confidential and any information that is clearly sensitive in nature. Confidential information may not be used for personal gain or disclosed to any third party without explicit authorization. This duty remains in full effect after the termination of the employment relationship.

### 1. Protection of Confidential Information

Employees shall protect the confidentiality of all internal company information as well as information entrusted to Hegelmann by customers, business partners, or third parties. Confidential information may not be disclosed, shared, or used for any purpose other than legitimate business activities.

### 2. Handling and Disclosure of Confidential Information

Employees must be aware of which information is considered confidential within the company and are required to maintain strict confidentiality at all times.

Where applicable, employees may be required to sign additional confidentiality agreements. No confidential information may be published, transferred, or otherwise made accessible to unauthorized persons.

### 3. Definition of Confidential Information

Information shall be treated as confidential if it is:

- explicitly marked as confidential, or
- clearly identifiable as business-critical, sensitive, or containing trade or company secrets.

If an employee is uncertain whether information is confidential, clarification must be obtained from the direct supervisor.

### 4. Data Protection and Personal Data

Employees must comply with all applicable data protection laws, including national and EU data protection regulations (e.g., GDPR).

Personal data may only be collected, processed, and used when legally permitted and only to the extent required for business purposes.

Employees must ensure that:

- personal and confidential data is stored securely,
- unauthorized access is prevented,
- data is not copied, transferred, or disclosed without authorization.

### 5. Seeking Guidance

In situations of doubt, employees must consult the company's Data Protection Officer or their direct supervisor. All employees are responsible for understanding and following the company's data protection policies.

### 6. Protection Against Loss, Misuse, or Theft

Employees shall take all appropriate measures to prevent the loss, theft, misuse, alteration, or unauthorized disclosure of confidential or personal data.

Company systems, devices, and documents must be used safely and responsibly.

### 7. Obligation After Termination of Employment

The duty to protect confidential information continues after employment ends.

Former employees must not disclose or use any confidential information obtained during their employment under any circumstances.

## Conflict of interest

A conflict of interest arises when an employee's personal, financial, or other external interests interfere – or could appear to interfere – with the interests of Hegelmann. All employees must avoid situations where their private interests conflict with their responsibilities towards the company.

#### 1. Acting in the best interest of the company

Employees must always perform their duties in a manner that serves the legitimate interests of Hegelmann. No individual or external party connected to an employee may gain improper advantage through the employee's position, responsibilities, or access to information.

#### 2. Avoiding personal conflicts

Employees must avoid any situation in which personal interests, relationships, or activities could compromise – or appear to compromise – their professional judgment, objectivity, or loyalty to the

company. Any behavior that could negatively affect the company's reputation or interests must be prevented.

### 3. External employment and participation in competing businesses

Employees may not engage in any business activities, investments, or financial involvement with companies that compete with Hegelmann without obtaining prior written approval from the company. This includes direct or indirect participation in competitor organizations.

### 4. Transparency and mandatory disclosure

All potential or actual conflicts of interest must be reported immediately and in writing to a direct supervisor or the responsible compliance representative. The company will assess each situation and decide on appropriate measures.

Employees are permitted to engage in external activities that do not conflict with the interests of the company or the proper performance of their duties. However, such activities must always be disclosed before they begin, in order to rule out any conflict of interest.

## Political and social activities

Employees of Hegelmann are free to participate in political and social activities as part of their personal rights. However, such engagement must be clearly separated from their professional duties and must not affect the interests or reputation of the company.

The following principles apply:

#### 1. Personal engagement outside the company

Employees may take part in political or social activities, including running for public office, participating in election campaigns, fundraising, or supporting organizations or political parties. Such activities must not interfere with the proper and timely execution of their job responsibilities.

#### 2. Separation of personal opinions and company representation

Employees must ensure that any political or public statements they make are clearly understood as their **personal opinions** and not those of Hegelmann.

Company resources – including email, premises, logos, vehicles, or work time – must not be used for political or social activities.

#### 3. Avoiding conflicts of interest

Employees must ensure that their private or political interests do not conflict with the interests of the company. Such interests may not influence professional decisions, nor may they be used to gain personal benefits for themselves, family members, friends, or other associates.

#### 4. Duty to inform

Employees are required to inform their direct manager if they intend to assume or currently hold a role in:

- political parties,
- elected bodies,
- governmental or self-governing organizations, if such involvement could potentially affect their duties or create a conflict of interest.

## Environmental protection

As a responsible company, Hegelmann is committed to balancing environmental protection, the needs of society, and sustainable corporate development. Protecting the environment is an integral part of our daily work and a shared responsibility of all employees.

Hegelmann is committed to:

- Complying with all applicable environmental laws, regulations, and standards relevant to our operations.
- Using raw materials, energy, and other resources responsibly and efficiently, avoiding waste and promoting sustainable consumption.
- Actively participating in waste sorting and recycling practices at the workplace, ensuring proper disposal and supporting environmental initiatives.

All employees are expected to contribute to environmental protection by following internal procedures, using resources responsibly, and reporting any environmental risks or concerns to their supervisor.

## Corruption

Hegelmann maintains a strict zero-tolerance policy toward all forms of corruption and unethical influence. Employees must conduct all business activities with the highest level of integrity and must never use their position for personal gain.

### 1. Prohibition of corrupt practices

Employees are strictly prohibited from directly or indirectly offering, requesting, accepting, or receiving any improper personal benefit—such as gifts, services, payments, privileges, promises, or other advantages—in exchange for performing, omitting, or influencing any work-related action.

Corrupt behavior also includes facilitating payments, kickbacks, bribery attempts, and any conduct intended to unlawfully influence business decisions.

### 2. Private interests

Employees must avoid situations where personal interests—or the interests of relatives, friends, or associates—could improperly influence their professional decisions. Private interests must never take precedence over the company's legitimate business interests.

### 3. Third-party influence

Employees must remain vigilant toward attempts by external parties—such as clients, suppliers, intermediaries, or other stakeholders—to improperly influence decisions or gain unauthorized advantages. Any attempt at bribery, undue pressure, or manipulation must be immediately reported to a manager or compliance representative.

### 4. Transparency and reporting

Employees must promptly report any suspected case of corruption, bribery, or unethical influence. Reports made in good faith will be handled confidentially, and the employee will be fully protected from any form of retaliation.

## Bribery

Hegelmann does not tolerate any form of bribery. Employees must never, directly or indirectly, offer, request, receive, or accept any improper benefit intended to influence a business decision or obtain an unfair advantage.

Bribery includes any form of undue benefit, such as cash payments, expensive gifts, travel, accommodation, services, career opportunities, discounts, favors, or the disclosure of commercially valuable information.

All interactions with business partners, public officials, suppliers, and third parties must remain transparent, ethical, and compliant with applicable anti-corruption laws. Any suspected attempt to offer or request a bribe must be reported immediately through internal reporting channels.

## Misconduct of Duties

Employees are expected to perform their duties responsibly, professionally, and in full compliance with internal regulations. The company does not tolerate any misuse of authority or deviation from assigned responsibilities.

- Abuse of authority is strictly prohibited.
- Employees may not use their position, responsibilities, or access rights in any way that exceeds or contradicts internal rules or granted authorisations.
- Company resources must be used appropriately. All work equipment, financial assets, property, and materials provided by the company may only be used for legitimate business purposes and in accordance with internal policies and procedures.
- Protection of company assets. Employees are required to safeguard company property, immediately report any misuse or damage, and take reasonable steps to prevent theft, loss, improper handling, or unlawful actions involving company resources.

## Business arrangements that facilitate payments

The company strictly prohibits all forms of facilitation payments. Facilitation payments are unofficial or improper payments made to public officials or other third parties with the intention of expediting routine administrative procedures or obtaining preferential treatment.

Employees must not, directly or indirectly:

- make, offer, request, or accept any payment intended to influence or accelerate administrative processes;
- engage in business arrangements that could be construed as facilitation payments;
- use company funds or resources to provide benefits to government officials or third parties for improper purposes.

All business transactions must be transparent, properly documented, and conducted in full compliance with applicable anti-corruption laws.

Any suspected or attempted facilitation payment must be reported immediately through established reporting channels.

## Gifts and hospitality

Hegelmann is committed to maintaining the highest standards of integrity and impartiality. The acceptance or offering of gifts and hospitality must never compromise – or appear to compromise – the objectivity, independence, or professional judgment of any employee.

### 1. Definition of Gifts and Hospitality

For the purposes of this Code, gifts include any property, benefit, goods, ownership rights, services, or other advantages offered or received without payment.

Hospitality includes invitations to events, meals, entertainment, conferences, or similar activities.

### 2. Prohibited Gifts and Hospitality

Employees shall not accept or offer any gift or hospitality that:

- could create a real or perceived conflict of interest,
- goes beyond normal and legitimate business practice,
- seeks to influence a business decision or secure an improper advantage, or

- could reasonably be interpreted as an attempt to obtain preferential treatment.

The company strictly prohibits the offering or acceptance of any monetary gifts, regardless of the amount.

### 3. Permissible Business Gifts and Hospitality

Employees may accept or offer:

- symbolic or low-value corporate gifts (e.g., branded merchandise),
- hospitality consistent with international business customs (e.g., business lunches, conferences, trade fairs), provided that such gestures are:
  - appropriate, customary, and reasonable in value,
  - transparent,
  - aligned with legitimate business purposes, and
  - compliant with applicable laws and internal company policies.

### 4. Third-Party Sponsored Events

If employees participate in events organized by business partners, associations, or non-profit organizations, and if such participation is lawful and in line with company standards, related travel or participation costs may be covered partially or fully by the inviting party – provided that this does not create improper influence or expectations.

### 5. Principle of Reasonableness

In all cases, employees are required to apply the principle of reasonableness and sound judgment when evaluating any gift or hospitality.

Employees should always consider whether accepting such an offer could:

- influence their professional decisions,
- create an appearance of undue influence, or
- exceed what is customary in fair and transparent business relations.

When in doubt, employees should decline the gift or seek guidance from their manager or the Compliance Department.

## Support and Other Privileges

Hegelmann engages in social responsibility activities in a transparent, ethical, and legally compliant manner. All forms of financial or non-financial support must reflect the company's values and may not create risks of corruption, undue influence, or reputational harm.

1. Any support granted to private individuals or legal entities (including companies, institutions, or organizations) must follow the company's internal procedures. All decisions to grant support require prior approval from senior management.
2. Hegelmann may support initiatives in the fields of social welfare, education, culture, science, arts, and sports. Such support must clearly align with the company's values, its corporate social responsibility commitments, and its strategic objectives.
3. Support may not be used—directly or indirectly—as a covert form of bribery, an attempt to gain improper advantages, or in connection with illicit activities.
4. Hegelmann does not provide any support to political parties, political campaigns, or related organizations. Company resources may not be used to finance political activities in any form.

## Manipulation

Hegelmann does not tolerate any form of manipulation in the workplace.

Manipulation refers to any intentional and improper action in which an employee uses their position, authority, access to information, or professional knowledge to influence colleagues, external partners, companies, institutions, or organizations for an unlawful, unethical, or otherwise inappropriate purpose.

Such behavior includes attempts to gain personal advantage, to harm others, to distort decisions, or to improperly influence business processes or outcomes.

Employees are expected to act transparently, honestly, and professionally at all times. Any situation involving manipulation, attempted manipulation, or suspected manipulation must be reported immediately through the established reporting channels.

## Transparent procurement

Hegelmann is committed to fair, ethical, and transparent procurement practices. All employees involved in purchasing, supplier selection, or commercial decision-making must ensure that procurement activities are carried out in accordance with the company's internal rules and the principles of integrity, objectivity, and non-discrimination.

1. All procurement processes shall be transparent, traceable, and compliant with the company's Procurement Procedure and applicable legal requirements.
2. Procurement-related decisions shall follow the internal Procurement Procedure, which defines the criteria for supplier selection, evaluation, and cooperation.
3. Suppliers are to be selected based on the most economically advantageous offer, applying equal, objective, and non-discriminatory conditions during both the tendering and contract execution phases.
4. The company will take immediate and appropriate action if internal controls, audits, or other mechanisms reveal that suppliers, service providers, or other third parties engaged in procurement activities violate anti-corruption rules or procurement requirements.

# ENSURING THE EFFECTIVENESS OF THE CODE OF CONDUCT

Compliance with the provisions of this Code of Conduct is based on the personal integrity, responsibility, and ethical awareness of every employee. Hegelmann Express GmbH fully supports all employees who act in good faith and adhere to the principles outlined in this Code – especially in situations where external pressure may arise to act improperly or to violate these standards.

Employees who become aware of a potential violation or who suspect that the Code of Conduct or the Code of Ethics has been breached are expected to seek guidance from their direct manager or another appropriate point of contact.

All violations of the Code of Conduct may result in disciplinary measures in accordance with applicable laws and internal company regulations. Depending on the severity of the misconduct, consequences may include formal warnings, reassignment of duties, or termination of employment.

**If an employee has any questions regarding the Code of Conduct, they can contact their line manager or the HR Department.**

If an employee has any concerns related to unfair treatment, ethics, human rights, or any other kind of violation, they can report these confidentially through [compliance.heg-express@hegelmann.com](mailto:compliance.heg-express@hegelmann.com). Reports can also be submitted anonymously through our [complaint portal](#) or by scanning the provided QR code.

All reports will be handled with care in accordance with our Complaint Management System. We also guarantee protection against any form of retaliation for reports made in good faith, and every submission will be reviewed promptly and fairly.

In alignment with the EU Whistleblowing Directive, we guarantee that all reports will be acknowledged within seven (7) days of receipt. We commit to a diligent investigation and will provide the reporter with a comprehensive feedback update on the actions taken or the status of the investigation within three (3) months. Your identity and the details of your report will remain strictly confidential.

