



**HEGELMANN**  
DEUTSCHLAND

# CODE OF CONDUCT

## FOR BUSINESS PARTNER



Applies to all non-carrier Business Partners.

**Responsibility. Ethics. Sustainability. Our shared values.**

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# INTRODUCTION

The Hegelmann Express GmbH Business Partner Code of Conduct ("BP Code") sets out the principles, standards, and minimum requirements that all of our non-carrier business partners are expected to uphold when engaged in a commercial relationship with Hegelmann Express GmbH ("Hegelmann").

Hegelmann is committed to maintaining the highest standards of professionalism, ethical conduct, and responsible business practice. Our reputation and long-term success depend not only on our own behavior but also on the integrity and conduct of the partners we work with. We therefore expect every business partner to share our commitment to ethical, transparent, and responsible business operations.

This BP Code applies to all non-carrier business partners of Hegelmann, including but not limited to suppliers of goods and services, consultants, agents, intermediaries, subcontractors, joint venture partners, and any other third parties acting on behalf of or in cooperation with Hegelmann ("Business Partners"). Carriers engaged to perform transportation services on behalf of Hegelmann are subject to the separate Hegelmann Carrier Code of Conduct.

Business Partners are expected to ensure that the principles of this BP Code are embedded throughout their organizations and that any subcontractors or downstream partners engaged in work for Hegelmann meet equivalent standards.

# 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!

# COMPLIANCE WITH LAWS AND STANDARDS

Business Partners must conduct their operations in full compliance with all applicable national and international laws, regulations, and standards in every country in which they operate. This includes, but is not limited to, laws governing labor and employment, health and safety, environmental protection, data protection, anti-corruption, trade controls, and competition.

Hegelmann maintains a due diligence framework aligned with internationally recognized standards, including:

- The United Nations Universal Declaration of Human Rights;
- The ILO Core Conventions on labor rights;
- The UN Global Compact principles;
- The OECD Guidelines for Multinational Enterprises;
- The German Supply Chain Due Diligence Act (LkSG) and applicable EU supply chain legislation.

Business Partners are required to support Hegelmann's due diligence processes by providing relevant documentation, completing required assessments through the designated supplier intelligence portal (Osapiens HUB), and cooperating with any verification or audit activities initiated by Hegelmann.

In countries where legal requirements fall below the standards set by this BP Code, Business Partners are expected to apply the higher standard.

## HUMAN RIGHTS AND FAIR LABOR PRACTICES

Hegelmann is committed to upholding human rights across its value chain. Business Partners must respect the fundamental human rights of all people affected by their operations, including their own employees, contracted workers, and communities, and must take proactive steps to prevent, mitigate, and remediate adverse human rights impacts.

### Zero Tolerance of Forced and Child Labor

Business Partners must not engage in or tolerate any form of forced labor, debt bondage, human trafficking, or modern slavery. Workers must be free to terminate their employment at any time, subject to legally required notice periods.

No person below the legal minimum working age and in no case below 15 years of age may be employed. In industries or regions with an elevated risk of child labor, Business Partners must maintain a documented action plan to prevent and address any such risks.

### Equal Treatment and Non-Discrimination

Business Partners shall provide an inclusive working environment that promotes diversity and equal opportunity. Discrimination, harassment, intimidation, or any form of abusive treatment is strictly prohibited on any basis, including but not limited to gender, age, race, ethnicity, nationality, religion, disability, sexual orientation, or political opinion.

All personnel must be treated with dignity and respect. Business Partners shall take appropriate and timely action to investigate and address any reported complaint of discrimination or harassment.

**Integrity. Respect. Responsibility. Our shared values.**

## Fair Remuneration and Working Conditions

Business Partners shall ensure that all workers receive employment conditions that comply with applicable legislation and, where relevant, applicable collective agreements. This includes lawful working hours, fair remuneration, paid holidays, sick leave, and appropriate overtime compensation.

Wages must be paid regularly, in full, and transparently. Unlawful deductions, withholding of wages, or the retention of identity documents are strictly prohibited.

## Freedom of Association

Business Partners shall recognize and respect the right of all workers to freedom of association and collective bargaining in accordance with applicable law. Workers shall not face retaliation for joining or forming a trade union or for engaging in collective negotiations.

# HEALTH AND SAFETY

Business Partners must provide a safe and healthy working environment for all their personnel. This means systematically identifying and managing occupational health and safety risks, complying with all applicable health and safety laws, and implementing programs to prevent workplace injuries and ill-health.

At a minimum, Business Partners are expected to:

- Maintain a documented health and safety policy and implement a risk-based health and safety program;
- Designate a responsible person accountable for health and safety compliance;
- Provide all necessary safety training, personal protective equipment (PPE), and safe working procedures relevant to the nature of their operations;
- Ensure that workplaces are equipped with adequate fire protection, clearly marked emergency exits, and operational alarm systems;
- Conduct regular drills and safety audits proportionate to operational risk;
- Report serious accidents or safety-related incidents involving activities for Hegelmann within 24 hours and cooperate fully with any resulting investigation.

Business Partners must operate with a zero-tolerance policy toward the consumption or possession of alcohol, illegal drugs, or impairing substances by personnel during working hours.

# ENVIRONMENTAL RESPONSIBILITY

Hegelmann is committed to reducing its environmental footprint and supporting the climate goals of the European Union. We expect our Business Partners to take their environmental responsibilities seriously and to work toward continuous improvement in environmental performance.

Business Partners must comply with all applicable environmental laws and regulations. Beyond compliance, they are encouraged to adopt proactive measures to minimize waste, reduce energy consumption, lower greenhouse gas emissions, and implement environmentally responsible practices across their operations.

Specifically, Business Partners are expected to:

- Maintain a documented environmental policy and, where relevant to their operations, an action plan for the reduction of carbon dioxide emissions;
- Identify and manage the environmental impact of their operations, including resource consumption, waste generation, and emissions;
- Designate a responsible person for environmental management;
- Prioritize the use of environmentally certified products and services where available;
- Provide Hegelmann with relevant environmental data upon request, including emission data, energy use, and details of environmental initiatives undertaken.

Business Partners are encouraged to engage in open dialogue with Hegelmann on environmental improvement opportunities and to proactively share progress on sustainability targets.

## **BUSINESS ETHICS AND INTEGRITY**

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### **Zero Tolerance for Corruption and Bribery**

Hegelmann applies a strict zero-tolerance policy toward all forms of corruption, including bribery, facilitation payments, kickbacks, fraud, embezzlement, extortion, blackmail, and nepotism.

Business Partners must not, directly or indirectly, offer, promise, authorize, request, accept, or receive any payment, gift, benefit, or undue advantage intended to influence a business decision, secure preferential treatment, or gain any other improper advantage. This prohibition applies equally to interactions with Hegelmann employees and to dealings with public officials or any other third parties.

Business Partners must ensure that this zero-tolerance standard applies throughout their own supply chain, including subcontractors and agents acting on their behalf.

### **Conflict of Interest**

Business Partners must avoid situations in which personal, financial, or other private interests interfere or could reasonably appear to interfere with the proper and impartial conduct of their business relationship with Hegelmann.

Any actual or potential conflict of interest must be disclosed to Hegelmann promptly and in writing. Business Partners must not use their relationship with Hegelmann to secure improper benefits for themselves, their employees, or associated parties.

### **Gifts and Hospitality**

Business Partners must not offer any Hegelmann employee gifts, payments, entertainment, or other benefits that are intended or could reasonably appear to be intended to influence a business decision or gain improper preferential treatment.

Symbolic, low-value corporate gifts and reasonable business hospitality aligned with international business customs are generally permissible, provided they are transparent, appropriate in value, and consistent with applicable laws and Hegelmann's own internal standards. Cash gifts, regardless of amount, are strictly prohibited.

## Fair Competition

Business Partners must comply with all applicable competition and antitrust laws. They must not engage in price-fixing, bid-rigging, market allocation, or any other conduct that restricts or distorts fair competition. Hegelmann's competitiveness is built on quality, efficiency, and fair practice, and we expect the same from our partners.

## Transparency and Accurate Record-Keeping

Business Partners must maintain accurate, complete, and transparent business records and must not falsify, alter, or destroy records to conceal information or mislead Hegelmann or any regulatory authority. All transactions and business arrangements must be properly documented and conducted in accordance with applicable legal and accounting standards.

# CONFIDENTIALITY AND DATA PROTECTION

Business Partners may, in the course of their relationship with Hegelmann, gain access to confidential information, including business strategies, customer data, pricing information, operational procedures, and other commercially sensitive materials. Business Partners must treat all such information with strict confidentiality and must not disclose, share, or use it for any purpose other than performing their obligations to Hegelmann.

Confidential information must be protected from unauthorized access, loss, or misuse. Access to such information should be limited to those within the Business Partner's organization who genuinely require it for the engagement.

Business Partners who handle personal data on behalf of Hegelmann or its clients must comply fully with all applicable data protection laws, including the General Data Protection Regulation (GDPR) and relevant national data protection legislation. Personal data must be:

- Collected and processed only for the specific and lawful purposes for which it was obtained;
- Stored securely and protected against unauthorized access, alteration, or disclosure;
- Not transferred to third parties without an appropriate legal basis and authorization.

The obligation to protect confidential information and personal data continues beyond the end of the commercial relationship with Hegelmann.

# SUPPLY CHAIN RESPONSIBILITY

Business Partners are responsible for ensuring that the standards set out in this BP Code are upheld not only within their own organizations but also by any subcontractors, agents, or lower-tier suppliers engaged in activities related to their work for Hegelmann.

Business Partners must:

- Communicate the principles of this BP Code to their relevant subcontractors and downstream partners;
- Take reasonable steps to evaluate and monitor compliance within their supply chain;
- Ensure that subcontracting arrangements are entered into transparently and that Hegelmann is informed where required under commercial agreements;
- Provide Hegelmann with relevant information about their supply chain upon request.

Where a subcontractor or supply chain partner is found to be non-compliant with the standards of this BP Code, the Business Partner must promptly notify Hegelmann and take appropriate corrective action

## COMPLIANCE VERIFICATION AND AUDITS

The relationship between Hegelmann and its Business Partners is founded on transparency, trust, and mutual accountability. To support this, Hegelmann reserves the right to verify compliance with this BP Code through reasonable verification activities, including:

- Requesting supporting documentation, certifications, or self-assessment questionnaires through the Hegelmann Supplier Intelligence Portal (Osapiens HUB);
- Conducting or commissioning on-site audits of the Business Partner's premises, operations, or records;
- Engaging independent third-party auditors to assess compliance.

Business Partners are required to maintain up-to-date records and documentation demonstrating compliance with this BP Code and to provide such documentation to Hegelmann promptly upon request.

Any non-compliances identified through a self-assessment or audit must be corrected within the agreed time frame. Failure to remediate identified issues within the stipulated period may result in the Business Partner being required at its own expense to commission a third-party compliance audit approved by Hegelmann.

All information obtained through verification activities will be treated as strictly confidential by Hegelmann and used solely for compliance-related purposes.

In cases of severe or repeated non-compliance, including but not limited to confirmed human rights violations, corruption, fraud, or persistent safety breaches, Hegelmann reserves the right to suspend or terminate the business relationship with immediate effect.

# REPORTING SUSPECTED VIOLATIONS

Hegelmann is committed to maintaining an open, transparent, and safe environment for raising concerns. If any Business Partner, or any individual employed by or associated with a Business Partner, becomes aware of or suspects a violation of this BP Code or of any applicable law or regulation in connection with activities performed for Hegelmann, they are encouraged to report it promptly.

Reports can be submitted:

By email to [compliance.heg-express@hegelmann.com](mailto:compliance.heg-express@hegelmann.com);

Anonymously or confidentially through Hegelmann's [complaint portal](#) (QR code available on request or via the Hegelmann Supplier Portal).

All reports will be handled with care, in strict accordance with Hegelmann's Complaint Management System. Hegelmann guarantees full protection against any form of retaliation for reports made in good faith. Every submission will be reviewed promptly and fairly.

Business Partners must ensure that no person within their organization faces retaliation, disadvantage, or any form of adverse treatment for raising a concern in good faith, whether through Hegelmann's channels or their own internal reporting mechanisms.

