

CODE OF CONDUCT

FOR CARRIER



HEGELMANN
DEUTSCHLAND



Safety. Compliance. Partnership. Reliability.

Ident.Nr. POL-2026-888 Version 2

Approved on: 05.03.2026

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INTRODUCTION

At Hegelmann Express GmbH (“Hegelmann”), we are committed to setting new benchmarks for responsibility, reliability, and sustainability in the transport and logistics industry. Our success is built on strong partnerships – and our carriers play a decisive role in shaping the quality and reputation of our services across Europe.

Carriers represent Hegelmann every day: on the road, at customer sites, and in countless interactions that influence how our company is perceived. For this reason, it is essential that every carrier shares our commitment to safe, ethical, and professional transport operations.

To support this shared responsibility, we have established the Hegelmann Carrier Code of Conduct (“Carrier Code”). It defines the principles, expectations, and minimum standards that all carriers must meet when performing transportation services on behalf of Hegelmann Express GmbH.

The Carrier Code applies to all transport partners – including subcontractors, agents, consultants, and any individuals involved in transport operations (“Carriers”). The term “Driver” refers to any driver directly employed by the Carrier or engaged through subcontracting arrangements.

Carriers are expected to embed the principles of this Carrier Code in their daily operations. This includes full compliance with applicable laws and regulations, respect for human rights, fair and lawful working conditions, high levels of road and workplace safety, responsible environmental practices, and uncompromising business integrity.

Our cooperation with carriers is based on transparency, open communication, and mutual trust. Additional sustainability requirements or performance targets may be specified in individual commercial agreements. This Carrier Code reflects the strategic values and expectations of Hegelmann Express GmbH and represents our shared responsibility to ensure safe, responsible, and sustainable transport services.



Together, we ensure that all transportation performed on behalf of Hegelmann Express GmbH meets the highest standards of professionalism, safety, and accountability.

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!

CONTINUOUS IMPROVEMENTS

We encourage Carriers to continuously improve and to use effective management systems for all areas described in this Carrier Code. Carriers must have a functioning system to report, handle, and prevent incidents and operational deviations.

COMPLIANCE WITH INTERNATIONAL FRAMEWORKS AND APPLICABLE LEGISLATION

Hegelmann maintains a due-diligence system based on internationally recognized human rights, labour, environmental, and ethical standards.

Carriers must support this system by complying with the relevant requirements and cooperating with Hegelmann's assessments, documentation processes, and corrective actions.

To support this approach, all Carriers performing transport services for Hegelmann must follow these standards and cooperate fully with Hegelmann's due-diligence processes. This includes:

- Providing required information and documentation through the designated supplier portal (Osapiens HUB);
- Ensuring that all workers involved in transport operations are treated in accordance with internationally accepted labour and human rights standards;
- Avoiding practices that could cause or contribute to adverse human rights or environmental impacts;
- Implementing preventive or corrective measures when identified or requested by Hegelmann;
- Ensuring that any subcontracted drivers or transport partners also comply with these requirements.

These expectations apply to all Carriers as part of their cooperation with Hegelmann.

WORKING CONDITIONS AND EU MOBILITY PACKAGE

The Carrier shall respect internationally recognized human rights and ensure fair, safe, and lawful working conditions for all personnel involved in transport operations. This includes complying with all applicable labor laws and implementing practices that promote dignity, equality, and well-being in the workplace.

The Carrier must ensure full compliance with the EU Mobility Package, including:

- Legal driving and rest times
- Weekly rest outside the cabin where required
- Proper tachograph operation and calibration
- Route planning that allows legal rest

Carriers must not pressure drivers to exceed legal limits or violate rest regulations.

Equal Treatment

The Carrier shall provide an inclusive workplace that promotes diversity, equal opportunity, and equal pay for equal work. No form of discrimination, harassment, or victimization shall be tolerated. This prohibition applies to any employment-related matter, including recruitment, assignment of duties, training, promotion, termination, and compensation. Discrimination, harassment, or victimization is strictly prohibited on the basis of gender, transgender identity or expression, ethnic origin, nationality, religion or belief, disability, sexual orientation, age, pregnancy, trade union affiliation, or political opinion.

All personnel shall be treated with dignity and respect at all times. The Carrier shall take appropriate measures to prevent discriminatory behavior, address complaints promptly, and promote a culture of fairness and inclusion.

Any form of harassment, intimidation, humiliation, psychological pressure, or physical abuse against drivers or workers is strictly prohibited.

Reasonable Payment and Remuneration

The Carrier shall ensure that all personnel receive employment conditions in accordance with applicable legislation and, where relevant, central collective agreements. This includes provisions on working hours, remuneration, holiday entitlement, sick leave, and parental leave.

The Carrier shall ensure ethical recruitment practices. Workers must not pay recruitment fees, deposits, or any costs for employment. Passports, IDs, and driver documents must not be retained, withheld, or confiscated. Drivers must receive employment contracts in a language they understand.

All overtime shall be compensated in accordance with legal or collectively agreed requirements and shall be clearly itemized in written salary statements.

Wages must be paid regularly at the agreed time, transparently, in full, and directly to the employee. Unlawful deductions, penalties, or withholding of wages are strictly prohibited. Drivers must receive clear and itemized payslips.

Driver remuneration systems shall be designed in a way that does not create incentives to compromise road safety or violate driving and rest-time regulations. Pay structures must not encourage speeding, excessive driving hours, or the circumvention of legal requirements.

Drivers shall be provided with all legally mandated daily allowances and any other statutory payments related to their assignments.

Reasonable Working Hours, Rest Periods and Time Off Work

The Carrier shall ensure that all working hours, including overtime, comply with applicable national legislation and any relevant collective bargaining agreements. All working hours shall be accurately recorded unless otherwise permitted by law or collective agreement.

Personnel shall be guaranteed at least one day of rest per week and sufficient rest between shifts. Overtime shall be voluntary, agreed with personnel in advance, and not used regularly as a normal part of operations.

All drivers must fully comply with the driving and rest-time regulations set out in the EU Mobility Package, including tachograph regulations, weekly rest requirements, and return-home rules. The Carrier shall implement effective processes and systems to ensure compliance with all Mobility Package obligations.

Time off work, including annual leave, public holidays, sick leave, and parental leave, shall be granted and remunerated in accordance with applicable legislation.

Drivers who spend extended periods away from home should be offered free or subsidized travel home at regular intervals to support their well-being and work-life balance.

Employment Contract

All personnel shall be fully informed about their terms and conditions of employment and shall be provided with a written employment contract in accordance with applicable legislation.

Freedom of Association and the Right to Collective Bargaining

The Carrier shall recognize and respect the right of all personnel to freedom of association and collective bargaining in accordance with applicable laws. Personnel shall have the right to join or form trade unions and to engage in collective negotiations without fear of retaliation or discrimination.

In countries where freedom of association is restricted by law, the Carrier shall actively encourage open communication with personnel on matters related to occupational health and safety, working conditions, and employment terms.

Freedom and Mobility in the Labor Market

The Carrier shall not participate in or tolerate any form of forced labor, debt bondage, or human trafficking. No illegal or unfair deductions from salaries may be made, and wages must not be withheld unlawfully. Personnel shall be free to terminate their employment at any time, subject to legally required notice periods.

Any loans provided to personnel must be based on fair and lawful terms and must not restrict the employee's freedom to leave their employment.

Zero Tolerance of Child Labor

The Carrier shall ensure that all work is performed by personnel who have reached the legally required minimum working age. Under no circumstances shall workers be younger than 15 years of age, or younger than any higher minimum age required by local law.

Juvenile workers (those above the minimum age but not yet adults) may be employed only under lawful, safe, and appropriate conditions that protect their health, safety, and development.

In countries or industries with a known higher risk of child labor, the Carrier shall maintain and implement a documented action plan to ensure that the best interests of the child are protected.

Accommodation & Rest Facilities

When providing accommodation or arranging rest facilities, the Carrier must ensure that drivers have access to safe, hygienic, and adequate sleeping facilities that meet basic standards of comfort.

Sleeping in truck cabins must not be used in situations where it is prohibited by law.

PROVIDING A SAFE AND HEALTHY WORKPLACE

The Carrier shall promote a safe, healthy, and supportive working environment and shall prevent risks of physical injury, work-related illness, and mental ill-health arising from organizational, operational, or social factors in the workplace.

Continuous Improvement in Occupational Health and Safety

The Carrier shall systematically identify, assess, and manage the occupational health and safety risks associated with its operations. All health and safety efforts shall be documented and aimed at preventing workplace injuries, ill-health, and unsafe conditions.

The Carrier's occupational health and safety management shall include at least the following elements:

- A documented health and safety policy outlining the Carrier's commitments and responsibilities.
- A health and safety program that defines clear objectives, targets, and activities, together with concrete measures to eliminate or minimize occupational health and safety risks.
- A designated health and safety officer or responsible person accountable for implementing, monitoring, and maintaining the Carrier's health and safety processes.

The extent and complexity of the Carrier's health and safety efforts shall be proportionate to the nature, scale, and risks of its operations, taking into account factors such as workforce size, operational environment, and the specific hazards associated with transport activities.

Training and Safety

The Carrier shall ensure that all personnel involved in transport operations for Hegelmann hold the required permits, licences, professional qualifications, and training necessary to perform their duties safely and in compliance with applicable laws and industry standards.

Carriers must ensure that all assigned drivers complete Hegelmann's mandatory onboarding and safety training modules on the EDU training platform, and maintain proof of completion for audits.

Personnel shall receive regular training and instruction on any health and safety risks associated with their work, including but not limited to fire safety, hazardous work activities, handling of dangerous goods (where applicable), and first aid. The Carrier shall provide appropriate personal protective equipment (PPE), work tools, and ensure that all safety information is clearly communicated and readily accessible.

All workplaces, facilities, and operational sites used by the Carrier shall be equipped with adequate fire protection and emergency evacuation systems appropriate to the nature of operations and associated risk levels. Emergency exits must be clearly marked, illuminated, and kept unobstructed at all times. Fire alarm testing and evacuation drills shall be carried out on a regular basis.

When using a mobile phone while driving, only approved hands-free devices may be used and drivers must comply with all applicable road-safety regulations.

All vehicles used for Hegelmann transport operations shall be equipped with functional first-aid kits and fire extinguishers. The Carrier shall ensure that such equipment is always properly maintained and accessible.

Serious incidents, accidents, or safety-related events involving Hegelmann cargo or operations must be reported within 24 hours. The Carrier must cooperate in investigations and provide requested documentation.

Zero Tolerance of Alcohol and Drugs

All work performed on behalf of Hegelmann must be carried out without any influence of alcohol or drugs. For the purpose of this Code, "drugs" include narcotics, the non-medical use of pharmaceuticals, and anabolic steroids.

If alcohol or drug abuse is suspected or confirmed, the situation shall be managed in accordance with appropriate treatment or rehabilitation programs and in line with applicable regulations.

The Carrier shall ensure that drivers operate their vehicles only when fully fit for duty and not impaired by tiredness, alcohol, drugs, or any medication that may negatively affect driving performance. The Carrier is responsible for enforcing compliance with all applicable driving- and rest-time regulations.

Safe Parking and Facilities

The Carrier shall ensure that drivers have free or subsidized and conveniently accessible access to essential facilities, including toilets, showers, cooking facilities, and laundry services during their assignments.

The Carrier shall also ensure that drivers have free or subsidized and conveniently accessible access to secure parking areas that provide adequate protection for both drivers and vehicles.

For transports subject to TAPA requirements, the Carrier shall comply with all applicable TAPA security standards as communicated by the contracting party.

This obligation applies equally to all subcontractors engaged for such transports.

The Carrier shall ensure, in particular, compliance with TAPA requirements regarding secure parking, route planning, stop rules, incident reporting, and driver awareness.

ENVIRONMENTAL CONSIDERATIONS

The Carrier shall identify and understand the environmental impact of its transport operations and shall actively work to minimize negative effects on the environment.

Continuous Improvement of Environmental Performance

The Carrier shall implement systematic processes to identify, assess, and measure the environmental impact of its transport operations. Based on these findings, the Carrier shall take appropriate action to reduce negative environmental effects and continuously improve environmental performance, including minimizing resource consumption and emissions.

The Carrier's environmental efforts shall be documented and must include the following elements:

- A documented environmental policy outlining the Carrier's commitments and principles.
- An environmental action plan defining specific objectives, targets, and activities aimed at reducing environmental impact.

- A designated environmental officer or responsible person who is accountable for implementing, monitoring, and maintaining environmental initiatives.

The scope and complexity of the Carrier's environmental efforts shall be proportionate to the nature, scale, and risks of its operations, taking into account factors such as company size, operational volume, and the specific environmental impact of the services performed.

Plan for the Reduction of Carbon Dioxide Emissions

The Carrier shall maintain a documented plan outlining specific measures and activities aimed at reducing carbon dioxide emissions resulting from transport operations. This plan shall include clear objectives, implementation actions, and methods for monitoring and evaluating progress over time.

Engines and Vehicle Emissions

The Carrier shall ensure that all vehicles used to perform transportation services on behalf of Hegelmann comply with applicable European emission standards and contribute to reduced environmental impact through modern, fuel-efficient, and low-emission technology.

Heavy goods vehicles (gross vehicle weight above 3,500 kg) must:

- Meet, at a minimum, Euro 6 emission standards for all vehicles operated from 2021 onwards.

Light goods vehicles, N1 Class 2 (gross vehicle weight 1,330–3,500 kg), must:

- Be less than 8 years old.
- Meet, at a minimum, Euro 6 emission standards for all vehicles operated from 2021 onwards.
- Emit no more than 225 g CO₂ per kilometer (mixed driving) or operate entirely on renewable fuels or electricity.

Light goods vehicles, N1 Class 1 (gross vehicle weight up to 1,330 kg), must:

- Be less than 6 years old.
- Meet, at a minimum, Euro 6 emission standards for all vehicles operated from 2020 onwards.
- Emit no more than 150 g CO₂ per kilometer (mixed driving) or operate entirely on renewable fuels or electricity.

Fuel

The Carrier shall prioritize the use of renewable fuels whenever possible in order to reduce emissions and improve environmental performance.

If no renewable alternative is available, the Carrier shall use fuels that comply with the applicable European standards, specifically EN 228 for petrol and EN 590 for diesel.

For operations carried out in Sweden, the Carrier must use fuel that meets Environmental Class 1 requirements. In addition, the proportion of renewable fuels used in Sweden shall amount to no less than 25%.

Tires

All new and remoulded tires used by the Carrier must comply with all applicable EU legislation governing the sale and use of tires within the European Union. Tires that do not meet these requirements must not be used under any circumstances.

Except for remoulded tires and studded tires, the Carrier shall use tires with the lowest possible rolling resistance rating according to the EU tyre labelling system, provided that transportation can be carried out safely under prevailing road and weather conditions.

The Carrier shall ensure proper maintenance and regular inspection of all tires and shall maintain documentation demonstrating compliance with applicable regulations and labeling requirements, and provide such documentation to Hegelmann upon request.

Eco-Driving

The Carrier shall ensure that all drivers receive regular training in energy-efficient driving techniques (eco-driving). Such training shall cover fuel-efficient driving behavior, anticipation of traffic situations, optimal use of vehicle technology, and environmentally responsible operation.

The Carrier shall ensure that drivers apply eco-driving principles in daily operations and shall maintain documentation demonstrating completion of training and continuous improvement in driving performance.

Aerodynamic Equipment (Spoilers)

The Carrier shall ensure that all vehicles used for transportation on behalf of Hegelmann are equipped and operated in a manner that minimizes air resistance and contributes to improved fuel efficiency and reduced emissions.

Heavy vehicles must be fitted with appropriate aerodynamic equipment, such as roof and side spoilers or other comparable solutions, to ensure optimal aerodynamic performance.

The Carrier shall maintain such equipment in proper working condition and ensure that it is used correctly during operations.

Maintenance

The Carrier shall ensure that all maintenance, washing, cleaning, and handling of environmentally hazardous products, waste, and vehicle painting are carried out in full compliance with all applicable local laws and regulations.

The Carrier shall prioritize the use of environmentally certified or eco-labelled products whenever possible and ensure that all activities related to vehicle maintenance are performed in a manner that minimizes environmental impact.

The Carrier is responsible for maintaining proper documentation demonstrating compliance with maintenance and environmental regulations and shall provide such documentation to Hegelmann upon request.

Reporting of Environmental Data

The Carrier shall provide Hegelmann with relevant environmental data upon request. This may include, but is not limited to, vehicle and fuel statistics, fuel types used, the proportion of renewable fuels, vehicle Euro classes, and the results or progress of environmental programs and initiatives.

The Carriers must provide verifiable evidence of environmental measures upon request, including fuel certificates, mass-balance documentation, vehicle standards, and emission-related data.

The Carrier shall maintain transparent and accurate documentation of all environmental data relevant to transport operations performed for Hegelmann.

Furthermore, the Carrier is expected to maintain an open and constructive dialogue with Hegelmann to develop transport solutions that support Hegelmann's environmental objectives, including continuous improvement of energy efficiency and reduction of emissions.

ZERO TOLERANCE FOR CORRUPTION

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

The Carrier shall not, directly or indirectly, offer, promise, authorize, request, accept, or receive any payment, gift, benefit, or undue advantage for the purpose of influencing a business decision, securing a benefit, or gaining any other improper advantage.

The Carrier is strictly prohibited from offering any Hegelmann employee gifts, payments, benefits, or advantages intended to influence, manipulate, or facilitate the Carrier's business dealings with Hegelmann.

This prohibition applies equally to actions carried out through intermediaries, subcontractors, agents, or any other third parties acting on behalf of the Carrier.

Any actual or potential conflict of interest that could affect the integrity of the business relationship must be disclosed to Hegelmann without delay.

COMPLIANCE VERIFICATION AND AUDITS

The business relationship between Hegelmann and its Carriers is founded on honesty, trust, and cooperation. To ensure compliance with the Carrier Code of Conduct, Hegelmann must be granted the right to verify that the Carrier meets all applicable requirements.

In cases of severe human rights violations, forced labour, illegal deductions, serious safety breaches, or environmental misconduct, Hegelmann reserves the right to terminate the cooperation with immediate effect.

Carriers are required to use the Hegelmann Supplier Portal in Osapiens HUB to submit all mandatory documents, evidences, questionnaires, and updates. Failure to maintain up-to-date documentation in the portal may be considered non-compliance.

Hegelmann may conduct follow-up activities in the form of self-assessments and/or on-site audits performed by Hegelmann personnel or by an independent third party appointed or approved by Hegelmann. Such audits may include inspections of occupational health and safety conditions, vehicle safety, interviews with drivers or other personnel, and full access to accurate and comprehensive documentation demonstrating compliance with the Carrier Code.

Any non-compliances identified during an audit must be corrected within the agreed time frame. If the Carrier fails to complete a required self-assessment within the stipulated period, Hegelmann may require the Carrier to obtain, at its own expense, an audit report issued by a third party appointed or approved by Hegelmann confirming full compliance with the Carrier Code.

The Carrier is fully responsible for ensuring that all subcontractors, including subcontracted drivers or transport partners, comply with the Carrier Code. The Carrier must regularly evaluate and monitor its transport chain and provide Hegelmann with relevant information upon request. Any audits or inspections that Hegelmann conducts at a subcontractor's premises will be carried out only with the Carrier's knowledge and consent.

For transports subject to TAPA requirements, the Carrier remains fully responsible for ensuring that all subcontractors comply with the applicable TAPA security standards, in addition to this Carrier Code of Conduct. Upon request, the Carrier shall provide verifiable evidence of TAPA compliance, including relevant documentation, training records, and incident reports.

Hegelmann reserves the right to verify compliance with TAPA requirements within the transport chain as part of self-assessments and/or audits.

Unauthorized subcontracting is strictly prohibited. Carriers may only engage subcontractors with prior written approval from Hegelmann and remain fully responsible for their compliance with this Code of Conduct.

The Carrier must ensure that all subcontracted drivers and partners adhere to the same standards and provide documentation through Osapiens HUB when requested.

Failure to allow Hegelmann to verify compliance with the Carrier Code, or failure to remedy identified non-compliances within the agreed time frame, shall be considered a material breach of contract.

All information obtained through self-assessments or audits will be treated as confidential by Hegelmann and will not be shared with third parties or unauthorized Hegelmann personnel without the Carrier's written consent. Such information will be used solely for compliance-related purposes.

REPORT SUSPECTED VIOLATIONS

If any carrier or carrier employee has concerns or suspects any violation related to their cooperation with Hegelmann Express GmbH, including issues regarding unfair treatment, ethics, human rights, safety, or any other form of misconduct, they may report these concerns confidentially through 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.

Hegelmann Express GmbH guarantees protection against any form of retaliation for reports made in good faith, and every submission will be reviewed promptly and fairly. Carriers must ensure that no worker faces retaliation, punishment, or disadvantage for raising a concern or using Hegelmann's reporting channels.

