

Code of Conduct for Suppliers
of
DAKOSY Datenkommunikationssystem AG ('DAKOSY')
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§ 1 Preamble

DAKOSY is one of the leading software companies in Germany and has been offering cloud-based solutions for customs clearance, international freight forwarding and supply chain management for over 40 years. We operate, among other things, the Cargo Community platforms for the Port of Hamburg (PCS) and for the Frankfurt/Main and Hamburg airports. We manage the software packages and platforms in data centres with great availability. With more than 200 employees, we are a competent partner for our customers and business partners.

As a customer and market-orientated company, we strive to use this Code of Conduct to reinforce our integrity, reliability and credibility by establishing binding ground rules for our business partners on the supplier side. At the same time, we would like to use this Code of conduct to meet the ever-growing requirements in the area of corporate governance and compliance.

For cooperation purposes, we agree with our suppliers that the following regulations apply to a shared Code of Conduct. This agreement applies as the basis for all deliveries. The Supplier undertakes to comply with the principles and requirements of the Code of Conduct and to endeavour to contractually oblige its subcontractors to comply with the standards and regulations set out in this document. A violation of this Code of Conduct may ultimately be a reason for DAKOSY to terminate the business relationship, including all associated delivery contracts.

2. Principles

2.1 DAKOSY is committed to ethical, ecological and socially responsible corporate management. We expect the same behaviour from all our suppliers. We demand that the principles of ethical, social and ecological behaviour be observed by our suppliers and integrated into the corporate culture.

We also strive to continually optimise our business activities and our products and services in the spirit of sustainability and also ask our suppliers to contribute to this in the sense of a holistic approach.

2.2 This Code of Conduct is based on our unconditional desire to work collaboratively and lawfully

with our suppliers. We hereby bring together our basic rules for business conduct, which already apply to us today and will continue to be binding in the future, in this document. This Code of Conduct therefore provides a framework for orientation and applies to all of our business partners on the supplier side, in particular the suppliers, service providers and subcontractors that we commission.

2.3 The Code of Conduct creates standards for us, but at the same time it is a promise to the outside world for responsible conduct vis-a-vis customers, business partners and the public. It is our vital goal that all DAKOSY suppliers are committed to ethical business practices, fair conduct and full compliance with all laws. Together we bear responsibility for our company's reputation, because the misconduct of individuals can cause significant damage to all of us.

2.4 The Code of Conduct is based on national laws and regulations such as the German Supply Chain Due Diligence Act (LkSG), the EU's Corporate Sustainability Due Diligence Directive CSDDD as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Corporate Action, the Guidelines of the United Nations 'Business and Human Rights', the international labour standards of the International Labour Organization and the Global Compact of the United Nations.

3. Principles of ethical business conduct of the Supplier

3.1 Fair competition

The standards of fair business, fair advertising and fair competition are to be complied with by the Supplier. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors.

3.2 Data protection / information security

The Supplier undertakes to meet the reasonable expectations of their client, suppliers, customers, consumers and employees with regard to the protection of private information. The Supplier must comply with data protection and information security laws and official regulations when collecting, storing, processing, transmitting and sharing personal information. The Supplier

takes all necessary technical and organisational measures to protect the confidentiality, integrity, availability and authenticity of information and information systems in their respective organisational sphere and area of responsibility.

3.3 Intellectual property

Intellectual property rights must be respected; Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected. As a company in the IT industry, DAKOSY pays attention to the comprehensive protection of its industrial property rights, ancillary copyrights and, above all, copyrights. To the same extent, the Supplier shall respect and protect the industrial property rights, ancillary copyrights and copyrights of their respective customers, contractual partners and other third parties.

3.4 Integrity/bribery and avoidance of conflicts of interest

All business activities must be based on the highest standards of integrity. The Supplier must adopt a zero-tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards must be implemented to ensure compliance with anti-corruption laws.

3.5 Money laundering

DAKOSY only maintains business relationships with reputable customers, suppliers, service providers, subcontractors and other business partners whose business activities are in accordance with legal regulations and whose financial resources are of a legitimate origin.

3.6 Other criminal prohibitions

In addition to the areas mentioned above, white-collar criminal law also sanctions other illegal conduct, in particular fraud or favouring debtors to the detriment of an insolvent estate. DAKOSY does not tolerate any criminally relevant actions in the behaviour of its suppliers.

4. Principles of social and ecological responsibility of the Supplier

4.1 Social responsibility

For DAKOSY, social responsibility is of particular importance and an indispensable part of value-orientated corporate management. The Supplier shall orientate themselves towards this value as far as possible, for example through diversity in the

workforce and encouraging its employees to engage in social work.

4.2 Exclusion of forced labour

No forced labour, slave labour or similar work may be used. All work must be voluntary and carried out without threat of punishment. The Supplier's employees must be able to terminate their work or employment relationship at any time. In addition, unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation, must not take place. The commissioning or use of security forces must be avoided if, during the deployment, people are treated inhumanely or in a degrading way, or are injured, or if freedom of association is impaired.

4.3 Prohibition of child labour

Child labour may not be used in any phase of the production and delivery of services to DAKOSY. Suppliers are requested to adhere to the recommendation from the ILO conventions on the minimum age for the employment of children. Employees under the age of 18 may not be employed in work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.

4.4 Freedom of association

The right of workers to form and join organisations of their choice, to bargain collectively and to strike must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative options for an independent and free association of employees for the purpose of collective bargaining must be granted. Employees may not be discriminated against on the basis of founding, joining or being a member of such an organisation.

4.5 Prohibition of discrimination

Unequal treatment of employees in any form is inadmissible unless it is justified by the requirements of the employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin colour, disability, health status, political opinion, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

4.6 Protection of health, workplace safety

The Supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and injuries that may arise in connection with activities concerned. Excessive physical or mental fatigue must be prevented

by taking appropriate measures. In addition, employees are regularly informed and trained about applicable health and safety standards and safety measures.

4.7 Equal opportunity

The Supplier promotes equal opportunities for all of its employees. When it comes to promotions, salary negotiations and day-to-day collaboration, care is taken to ensure that no one is discriminated against due to their gender, religion, origin or other inappropriate criteria. The company actively counters any deviations from this.

4.8 Complaint procedure, whistleblower system and protection

The supplier shall offer an appropriate complaints procedure. The complaints procedure must be accessible to employees while maintaining confidentiality, identity and effective protection against discrimination. The Supplier is responsible for establishing an effective complaints mechanism for individuals and communities that may be affected by negative impacts. The Supplier shall establish a whistleblower system to the extent required by law. Each of its employees should be encouraged and have the opportunity to report existing or potential violations at the supplier, including this Code of Conduct - in particular criminal offenses and violations of the law - in good faith, without having to fear any disadvantages. A report must be made personally or anonymously.

4.9 Environmental protection / preservation of the natural basis of life

The supplier shall ensure the protection of our natural environment, ensure the environmentally friendly use of resources and the avoidance of environmental pollution. The Supplier may not deprive land, forests or waters, the use of which secures the livelihood of people, in violation of legitimate rights. They must refrain from harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption.

4.10 Consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided.

4.11 Handling energy consumption / efficiency

Energy consumption must be monitored. Economical solutions must be found to improve energy efficiency and minimise energy consumption.

5. Supplier's consent through acknowledgment

By reading this document, the Supplier undertakes to act responsibly and to adhere to the principles and requirements listed. The Supplier undertakes to communicate the content of this code in an understandable manner to employees, agents, their own suppliers and subcontractors and to take all necessary precautions to implement the requirements.