



**IFB Code of Conduct (Version Nov 2023)**

Table of Contents

- Foreword..... 2
- 1. Introduction ..... 2
- 2. Our Commitments ..... 2
  - 2.1 To our Employees..... 2
  - 2.2. Towards the Environment..... 2
  - 2.3. Towards Society..... 2
  - 2.4. Towards the Market..... 2
- 3. Responsibility and Integrity..... 2
  - 3.1. Personal Integrity..... 2
  - 3.2. Corporate Responsibility..... 3
  - 3.3. Accountability ..... 3
  - 3.4. When in Doubt..... 3
  - 3.5. Additional Leadership Responsibility ..... 3
- 4. Compliance with Laws and Regulations ..... 3
  - 4.1. Compliance with the Law..... 3
  - 4.2. Anti-corruption ..... 3
  - 4.3. Competition Law ..... 4
  - 4.4. Gifts, Hospitality and Entertainment ..... 4
- 5. Workplace Culture and Environment..... 4
  - 5.1. Respectful Treatment..... 4
  - 5.2. Diversity and Inclusion..... 4
  - 5.3. Workplace Safety ..... 4
- 6. Data Protection and Information Security..... 5
  - 6.1. Protection of Personal Data..... 5
  - 6.2. Confidentiality and Discretion ..... 5
  - 6.3. Information Security..... 5
- 7. Company Resources..... 5
  - 7.1. Protection of Property ..... 5
  - 7.2. Use of Company Resources ..... 5
- 8. Reporting of Violations and Conflict Resolution ..... 5
  - 8.1. Reporting ..... 5
  - 8.2. Non-retaliation..... 5
- 9. Review and Improvement ..... 5
  - 9.1. Periodic Review..... 5
  - 9.2. Continuous Improvement..... 5
- 10. Closing Remarks ..... 6

## Foreword

At IFB International Freightbridge (Deutschland) GmbH (further outlined as "IFB"), we believe that the integrity of our daily work and our business relationships is the foundation of our success and reputation. Our Code of Conduct sets out the values and principles that guide our actions and helps us to do the right thing and build and maintain trust with our stakeholders. It applies equally to all employees, managers, and members of the Executive Board.

We are convinced that our Code of Conduct is an effective instrument of risk prevention that protects us from negative consequences such as monetary penalties or reputational damages. At the same time, we are committed to being recognized as a company of integrity whose members apply unquestionable and clear principles in the business.

## 1. Introduction

This code reflects our commitment to ethical corporate governance. It is not a substitute for good judgment or local laws and should be viewed as the framework within which we conduct our business.

## 2. Our Commitments

### 2.1 To our Employees

We are committed to a work environment characterized by respect, equality, and justice. We reject discrimination and harassment in any form and promote the personal and professional development of our employees.

### 2.2. Towards the Environment

Environmental protection is of critical importance to us. We are committed to continuously reducing our environmental impact and promoting sustainable practices.

### 2.3. Towards Society

We recognize our responsibility to society and support social and charitable projects. We respect the cultures, customs, and values of the societies in which we operate.

### 2.4. Towards the Market

We stand for fair competition and ethical business conduct. We are committed to transparency and fight against corruption in all its forms.

## 3. Responsibility and Integrity

### 3.1. Personal Integrity

We act honestly and authentically and keep our promises. Every employee contributes to the culture of integrity at IFB.

### 3.2. Corporate Responsibility

We make decisions based not only on financial considerations but also take social and environmental aspects into account.

### 3.3. Accountability

We are responsible for our actions and decisions and stand by them.

### 3.4. When in Doubt

IFB members should ask themselves the following:

- “Is what I intend to do legally permitted and in line with IFB’s Code of Conduct and policies?”
- “Would my managers, colleagues, and subordinates view my conduct as ethical?”
- “Would my family and friends view my conduct as ethical?”
- “Would those who are directly involved view my conduct as ethical?”
- “Would I want to be treated the same way?”
- “Would I feel comfortable if my conduct appeared in the media and attributed to me?”

### 3.5. Additional Leadership Responsibility

To foster and promote a culture of honesty in their area of responsibility, they should:

- set a good example and offer support to staff members when they face ethical dilemmas,
- take full responsibility for the wrongdoing of their staff,
- oversee their staff members adequately,
- assign competent staff members for tasks and provide proper instruction in line with relevant laws and rules,
- actively participate in regular compliance checks with the Code of Conduct,
- clearly communicate that breaking the law or the Code of Conduct may result in serious employment consequences, and
- rectify any misconduct and ensure appropriate disciplinary actions as needed in compliance with internal policies and laws.

## 4. Compliance with Laws and Regulations

### 4.1. Compliance with the Law

At IFB, we are committed to complying with all relevant laws and regulations. We actively inform ourselves about the legal framework applicable to us and comply with it.

### 4.2. Anti-corruption

Bribery and corruption are unacceptable in any form. We are committed to fair business practices and competition. Bribery can take many forms beyond cash payments such as gifts, travel, entertainment, or any other undue advantage. We will not engage in any form of active (“giving”) or passive (“receiving”) bribery and expressly prohibit our members from engaging in any form of bribery. The

prohibition also applies to any contributions or payments made through consultants, suppliers, or other third parties on behalf of IFB.

#### 4.3. Competition Law

We strictly adhere to fair competition laws and avoid anti-competitive behavior. Members must familiarize themselves with all relevant anti-corruption laws and conduct business in strict compliance with these laws. Transactions that appear to be illegal or unethical should be rejected. Suspected violations of bribery laws and requests for payment by or for government officials should be immediately reported.

At IFB, we are committed to upholding the highest standards of integrity and ethical behavior in all our business dealings.

#### 4.4. Gifts, Hospitality and Entertainment

We recognize that business gifts, hospitality, and entertainment on a modest scale can be a regular part of doing business and are commonly used to build goodwill and strengthen working relationships among business partners. However, if offers of gifts, hospitality, or entertainment are frequent or of substantial value, they may create the appearance of or create an actual conflict of interest or improper payment.

We require that the use of gifts, hospitality, and entertainment must always follow IFB's standards of transparency and be in compliance with our approval and reporting procedures. Members may only accept or offer unsolicited non-monetary gifts if they do not go beyond common courtesy and are accepted by local business practices. Members may accept or offer unsolicited hospitality and entertainment, but it must be infrequent, separated from influencing business decisions, and reasonable in value.

### 5. Workplace Culture and Environment

#### 5.1. Respectful Treatment

Respectful interaction is the basis of our success. We communicate openly, honestly and constructively.

#### 5.2. Diversity and Inclusion

We value the diversity of our workforce and are committed to an inclusive corporate culture in which every individual is valued.

#### 5.3. Workplace Safety

Safety in the workplace is a top priority. We strive to minimize hazards and ensure a safe workplace for all.

## 6. Data Protection and Information Security

### 6.1. Protection of Personal Data

At IFB, we take the protection of personal data seriously and comply with data protection laws and standards. We ensure that personal data is processed lawfully, fairly, and transparently.

### 6.2. Confidentiality and Discretion

We treat confidential information discreetly and protect it from unauthorized access. We ensure that confidential information is only shared with authorized personnel on a need-to-know basis.

### 6.3. Information Security

We implement appropriate measures to protect our systems and data against cyber-attacks. We are committed to ensuring that our employees are aware of the importance of information security and are trained to handle sensitive information with care.

## 7. Company Resources

### 7.1. Protection of Property

Company property, including intellectual property, trade secrets, and other confidential information, shall be protected and used properly.

### 7.2. Use of Company Resources

Company resources shall be used responsibly and in the best interest of IFB.

## 8. Reporting of Violations and Conflict Resolution

### 8.1. Reporting

We have clear procedures for reporting ethical concerns and violations of this code.

### 8.2. Non-retaliation

No one will be retaliated against or penalized for reporting concerns or violations in good faith.

## 9. Review and Improvement

### 9.1. Periodic Review

This code will be reviewed and updated regularly to ensure that it remains relevant and effective.

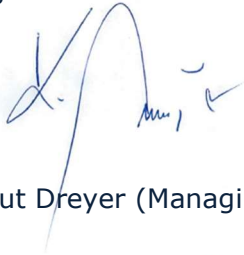
### 9.2. Continuous Improvement

We strive to continuously improve our standards and integrate best practices into our business.

## 10. Closing Remarks

The Code of Conduct is more than just a document; it is a promise to ourselves and to the world in which we live and work. We are all IFB and our actions shape the future of our company.

Sign:



Knut Dreyer (Managing Director)



Frank Mielke (General Manager, authorized signatory)

Datum: 20. November 2023