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VERHALTENSKODEX
CODE OF CONDUCT

CODE OF CONDUCT (CODE OF CONDUCT)

of the MÜLLER Group | DIE LILA LOGISTIK

PREAMBLE

COMPANY

As a logistics service provider operating both nationally and internationally, MÜLLER | DIE LILA LOGISTIK offers all relevant contract logistics services. The fields of procurement logistics, production logistics, and distribution logistics form the core of the Group's business activities.

Committed, competent, and responsible employees are of central importance to the success of Lila Logistik. Our orientation and strategy require, as a foundation, a shared system of values and principles that serves as a guideline for all employees' conduct.

REQUIREMENTS

As we continue to grow, the expectations regarding our conduct in daily business dealings and in our interactions with business partners have also increased. In addition, there are new national and international legal requirements.

We aim to ensure compliance with laws and regulations in the countries where we operate by adhering to uniform standards. This Code of Conduct is a key component of Lila Logistik's approach to corporate governance. The Code contains all principles and measures aimed at ensuring that our legal representatives and employees conduct themselves in compliance with the rules. These standards form the indispensable foundation for our business processes, both internally and externally.

GENDER NOTE:

For the sake of readability, the masculine form is used in this guideline for references to people and personal nouns. In the spirit of equal treatment, such terms apply to all genders. The use of the masculine form is for editorial reasons only and does not imply any judgment. MÜLLER | DIE LILA LOGISTIK promotes a diverse and inclusive workforce at all times. We consider respect and tolerance toward the LGBTQIA+ community to be a given.

I. GENERAL

1. PURPOSE OF THE CODE OF CONDUCT

It is essential that every employee act in an impeccable and responsible manner. With this Code of Conduct, we aim to set forth in writing our values and our conduct, both in our interactions with one another and with our business partners. In addition to compliance with laws and regulations, we also uphold our values; this entails a voluntary commitment and self-restraint even in areas where the law allows for discretion.

2. SCOPE

This Code of Conduct defines and regulates binding minimum standards and demonstrates a commitment to acting with integrity, as well as to our social and environmental responsibilities. It serves as a guideline for the conduct of all employees—regardless of position or area of responsibility—and applies to the entire Lila Logistik Group.

3. EXPECTATIONS AND PRINCIPLES

Our employees are aware that through their conduct they also represent Lila Logistik and thus shape its competitive position externally and its culture internally. All employees treat others in the same way they expect to be treated by others. This results in fair and respectful interactions with one another within the company as well as with business partners. Therefore, we consider the following core values to be binding for all employees:

- ▶ Respect for human rights in accordance with the International Charter of Human Rights (OHCHR)
- ▶ UN Guiding Principles on Business and Human Rights (UNGPs)
- ▶ Declaration of the International Labour Organization (ILO) on Fundamental Principles and Rights at Work
- ▶ Principles of the United Nations Global Compact (UNGC)
- ▶ Guidelines of the Organization for Economic Cooperation and Development
- ▶ OECD Guidelines for Multinational Enterprises

as well as

- ▶ Compliance with the law
- ▶ Respect for the individual and human dignity
- ▶ Prohibition of any form of discrimination
- ▶ Fair and cooperative collaboration, both internally and externally
- ▶ Professionalism, sincerity, loyalty, personal responsibility, and integrity
- ▶ Respect for others and the environment
- ▶ Compliance with the LILA Constitution
- ▶ Compliance with occupational safety standards and maintenance of a safe work environment
- ▶ Protecting the environment and ensuring sustainable business practices

These values foster a shared, overarching identity across all Lila Logistik companies.

4. LEADERSHIP CULTURE AND THE LILA CONSTITUTION

The values and goals of the corporate group—and ultimately, the value system for the people in our organization—are set forth in the LILA Constitution. It is accessible to all employees. The LILA Constitution forms the foundation of LILA's culture and corporate identity.

We expect our managers, in particular, to align their own behavior with the LILA Constitution and thereby serve as appropriate role models.

By practicing value-oriented leadership, managers foster a tolerant and fair working environment. Through an open-minded attitude toward their employees, they create a work atmosphere that facilitates an open exchange of ideas. As part of their leadership responsibilities, managers prevent unacceptable behavior. They act as mediators in relevant conflicts.

II. THE FUNDAMENTAL PRINCIPLES OF MÜLLER | DIE LILA LOGISTIK

We base our actions on universally accepted ethical values and principles; in particular, we strive for a high standard of integrity and do our best to fulfill our social and environmental responsibilities. This includes honesty and integrity, respect for human rights and human dignity, openness, and non-discrimination on the basis of religion, ideology, gender, and ethnicity. Our guiding principle is this: We comply with the laws, regulations, and other legal provisions that apply to us. From this, we derive the following standards for ourselves:

1. INTEGRITY

We set high standards for acting with integrity. To meet these high standards, we promote transparency, responsible leadership, and oversight within the company. For us, acting with integrity means, in particular:

A. COMPLIANCE WITH THE LAW AND ACTING IN ACCORDANCE WITH THE LAW

In all areas of our business activities, we are subject to laws, regulations, and other legal provisions. These include national and international regulations as well as regional and local rules. It goes without saying that we respect and comply with the legal provisions applicable in the respective jurisdictions in which we operate. To this end, every employee must be familiar with the legal provisions relevant to their work and must also communicate the respective regulations to the employees under their supervision. In addition, every employee must comply with the terms of their employment contract and the relevant company policies.

All material business transactions must be properly and completely recorded. No one may participate in or engage in the request for or creation of false invoices, payroll entries, or other misleading documents, or fictitious financial arrangements.

B. HONESTY AND COMPETITION

We stand by our word. We do not provide false information knowing it to be untrue. We follow sound and recognized business practices and act as fair competitors in a competitive environment. We conduct ourselves professionally and gain a competitive edge through the high quality of our work, not through anti-competitive behavior. We respect the intellectual property of third parties and do not use or participate in plagiarism.

We never disparage other companies or institutions. Our conduct toward external partners and market participants is professional, transparent, respectful, and fair, for the benefit of our stakeholders.

We maintain a cooperative and trusting relationship with regulatory authorities.

C. ANTITRUST LAW

We uphold fair competition. This means we compete on the basis of performance and not through improper agreements with other companies. We do not exchange information with our competitors regarding anything that could impair competition. In particular, this means we do not enter into agreements regarding, for example, prices, terms, and conditions—neither in writing, nor verbally, nor through implied conduct. The same applies to coordinated conduct among companies that leads to a similar result. We respect the freedom of our customers by not unduly restricting their competitive activities. Violations may be punished by antitrust authorities, for example, with fines against companies, supervisors, and individuals involved, and in exceptional cases, with prison sentences.

In particular, this means:

- ▶ No agreements on prices or other terms of trade
- ▶ No unreasonably high prices (exploitation of customers), provided that we hold a dominant market position in the relevant sector
- ▶ No unrealistically low prices (market displacement of competitors), provided that we hold a dominant market position in the relevant sector
- ▶ No division of markets or customer groups with competitors
- ▶ No discrimination against certain customers, provided that we hold a dominant market position in the relevant sector
- ▶ No exchange of competitively sensitive business information from Lila Logistik or our business partners.

D. PREVENTION OF CORRUPTION, EXTORTION, AND BRIBERY; CONFLICTS OF INTEREST

We do not tolerate unethical or corrupt practices, nor do we tolerate extortion or bribery by employees. We maintain transparency in our dealings with all business partners and government authorities. We reject any form of corruption, whether public or private, active or passive, and comply with anti-corruption laws.

Employees may not offer or accept gifts with the intent to exert unlawful influence and may only offer or grant gifts of modest value. Gifts of modest value refer to gifts, hospitality, and other invitations where the occasion, form, and scope are appropriate, such as occasional gifts of purely symbolic value.

E. MONEY LAUNDERING

Our company must not be misused for money laundering. Transactions in which a violation cannot be ruled out must be rejected. Anti-money laundering laws and regulations are complied with without exception.

F. DISCLOSURE OF INFORMATION, PREVENTION OF INSIDER TRADING, AND AVOIDANCE OF CONFLICTS OF INTEREST

Lila Logistik is subject to stock corporation law and is obligated under that law to disclose information and avoid conflicts of interest.

All Lila Logistik employees are prohibited from misusing or disclosing insider information. Lila Logistik is committed to fair securities trading. Ad hoc announcements regarding LILA-related information are published immediately; until such announcements are made, this information may not be disclosed without authorization or used for securities transactions.

All external communications must be coordinated with the Corporate Communications department. Only authorized persons are permitted to disclose information concerning Lila Logistik to the public, the media, or other third parties on behalf of the company.

Our employees must not engage in activities that would create a conflict of interest between their personal interests and those of Lila Logistik. This includes, for example, refraining from using family or other personal relationships to unduly influence business judgment.

G. EXPORT AND ECONOMIC CONTROLS, TRADE SANCTIONS

We comply with all foreign trade, export control, and customs regulations applicable to us. We also comply with the sanctions laws and regulations applicable to us. This applies in particular to all laws and regulations applicable to us (“sanctions laws”) that concern the restriction of business relationships with the following entities:

- ▶ Countries and/or political subdivisions in countries subject to sanctions (collectively, “sanctioned countries”); and
- ▶ Companies, as well as natural and legal persons—including their representatives—who are resident in sanctioned countries or are listed on national or international sanctions lists (collectively, “sanctioned persons”).

H. TAXES

We pay our taxes on time and in accordance with the tax laws applicable to us. We have implemented a tax compliance system and adhere to the processes we have established as part of our tax compliance system.

I. DATA PROTECTION COMPLIANCE

All data protection regulations must be observed. In particular, the protection of personal data, internal company data, and confidential data of business partners must be strictly ensured throughout our entire business process.

In the spirit of teamwork and collaboration, great importance is placed on the accuracy and completeness of the information created and/or documented. All business matters that come to light in the course of business operations are treated as strictly confidential, regardless of whether they concern the company or third parties. The utmost care is taken in handling and storing such information. Employees must maintain confidentiality regarding all trade secrets both during the term of their employment and after its termination.

J. NO MISLEADING MARKETING PRACTICES

We do not engage in or participate in deceptive marketing practices.

K. SCIENCE AND TECHNOLOGY

We ensure that our activities are consistent with the science and technology policies of the countries in which we operate.

L. PROHIBITION OF ALCOHOL AND DRUGS

Working under the influence of alcohol, illegal drugs, or other substances is prohibited.

M. VOLUNTEER WORK

We encourage our employees to engage in volunteer work.

2. SOCIAL RESPONSIBILITY

We are committed to promoting human rights and fair working conditions. We adhere to the United Nations Universal Declaration of Human Rights and the internationally recognized core labor standards of the International Labor Organization (ILO). This applies even if these regulations are not explicitly referenced again in the following points. In doing so, we pay particular attention to the rights that play a special role in the workplace. These rights guide and underpin our corporate policy.

A. FAIR WORKING CONDITIONS, FAIR WAGES, OCCUPATIONAL SAFETY, AND EMPLOYEE MANAGEMENT

Our employees' high level of commitment in the workplace is matched by the company's social responsibility to ensure optimal working conditions. This includes compliance with applicable laws and regulations regarding working hours, minimum wage thresholds, and minimum wages. We also ensure that everyone working at Lila Logistik can perform their duties safely. We therefore take care in every situation to prevent workplace accidents or work-related health hazards and to reduce risks.

We do not tolerate bullying. Any form of bullying will be sanctioned.

We continuously develop our employees' professional skills to meet the highest quality standards in an ever-changing global market.

Our employees are evaluated based on their performance and receive honest and fair feedback.

B. EMPLOYEE RIGHTS, FREEDOM OF ASSEMBLY, AND FREEDOM OF COLLECTIVE BARGAINING

We respect our employees' right to freedom of association, freedom of assembly, and the right to collective bargaining. Employees who exercise these rights will not be disadvantaged.

C. EQUAL TREATMENT, PERSONAL RIGHTS, AND MINORITIES

We value all employees for their individuality. Accordingly, we treat all employees equally, regardless of their national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion, worldview, or similar factors. We respect the personal rights of others and do not arbitrarily or unlawfully intrude on their privacy or damage their reputation.

For us, the prohibition against discrimination includes the protection of the rights of minorities and indigenous peoples.

Tolerance, which is expressed through goodwill and open-mindedness toward our fellow human beings, excludes any form of extremist behavior.

D. FREEDOM OF EXPRESSION

Protecting and guaranteeing the right to freedom of opinion and expression is important to us. We do not condemn anyone based on their opinions and respect freedom of thought and conscience. At the same time, we expect that expressions of opinion in connection with Lila Logistik do not cross the line into criminal acts (e.g., insults and defamation as defined by the Criminal Code). Expressions of opinion related to Lila Logistik that are incompatible with our free and democratic constitutional order will also not be tolerated. As for expressions of opinion in private settings unrelated to LILA Logistik, we expect our employees to exercise responsibility in handling the precious right to freedom of expression.

E. NO CHILD LABOR AND REJECTION OF ALL FORMS OF MODERN SLAVERY AND OPPRESSION

No employee may be forced to work through violence and/or unlawful measures. We tolerate neither child labor nor any other form of exploitation of children and adolescents.

Modern slavery can take various forms and includes servitude, forced or compulsory labor, and human trafficking. These forms all involve the deprivation of a person's liberty by another person for the purpose of exploiting them for personal or commercial gain. At Lila Logistik, we have a zero-tolerance policy toward modern slavery, with the goal of preventing modern slavery not only within our company but also throughout our supply chains.

No employee may be oppressed. We ensure that our employees are protected from corporal punishment and from physical, sexual, psychological, or verbal harassment or abuse.

F. PROTECTION OF NATURAL RESOURCES, PROHIBITION OF ILLEGAL LAND GRABBING

We adhere to the prohibition against causing harmful soil degradation, water pollution, air pollution, harmful noise emissions, or excessive water consumption that

- ▶ significantly impair the natural resources necessary for the preservation and production of food,
- ▶ deny a person access to safe drinking water,
- ▶ hinders or destroys a person's access to sanitation facilities, or
- ▶ harms a person's health.

Furthermore, we adhere to the prohibition against unlawful evictions and the prohibition against the unlawful expropriation of land, forests, and water bodies when acquiring, developing, or otherwise utilizing land, forests, and water bodies whose use secures a person's livelihood.

G. USE OF SECURITY PERSONNEL

To protect our facilities, it may be necessary for us to engage security personnel to safeguard our facilities. Should we engage security personnel, we will ensure that they are appropriately trained and supervised to ensure that, in the course of their duties, they observe the prohibition against torture and cruel, inhuman, or degrading treatment, do not endanger life or limb, and do not infringe upon the freedom of association and the right to form coalitions.

3. RESPONSIBILITY FOR OUR ENVIRONMENT

We comply with environmental protection regulations and standards and act in an environmentally responsible manner. Our goal is to conserve natural resources and foster environmental awareness. Protecting the environment for current and future generations and complying with all applicable environmental laws as well as internal company guidelines is our fundamental commitment.

A. ENVIRONMENTAL MANAGEMENT SYSTEM

To continuously improve our environmental performance, we maintain an environmental management system. As part of our environmental management system, we identify and evaluate the potential impacts of our activities on the environment, health, and safety; set measurable goals; and, where necessary, establish targets to improve our environmental performance. Our environmental management system also provides for regular audits, including monitoring of our environmental objectives.

B. IMPACT ASSESSMENT, EMERGENCY PLANS, AND ENVIRONMENTAL TRAINING

We assess the foreseeable impacts of our activities on the environment, health, and safety to the best of our knowledge and belief, and we take the results of these assessments into account in our decision-making.

We have developed emergency plans to prevent, mitigate, or address serious environmental and health hazards.

We offer our employees regular training on environmental, health, and safety issues, as we are convinced that our environmental goals can only be achieved and health and safety can only be protected to the greatest extent possible if all employees contribute to this effort.

C. RESPECTFUL USE OF RESOURCES

We draw on all our experience, technical expertise, and creativity to conserve resources and minimize impacts on people and the environment. We are continuously working to improve our environmental performance and optimize our use of resources to meet national and European climate goals.

This includes, in particular

- ▶ Air pollution control through the reduction of greenhouse gas emissions and fine particulate matter
- ▶ Improving energy efficiency
- ▶ The use of renewable energy
- ▶ Reducing water consumption
- ▶ Prevention of water pollution, including through responsible management of hazardous substances and chemicals
- ▶ Preserving biodiversity, promoting sustainable land use, and preventing deforestation
- ▶ Preserving soil quality
- ▶ Sustainable resource management and waste reduction

D. MERCURY, PERSISTENT ORGANIC POLLUTANTS, HAZARDOUS WASTE

Hazardous substances pose significant risks to people and the environment. We are committed to preventing the hazards and risks associated with hazardous substances by complying with the relevant laws, regulations, and other legal provisions. We therefore adhere to international standards governing the handling of mercury and persistent organic pollutants (the Minamata Convention on Mercury and the Stockholm Convention on Persistent Organic Pollutants).

Finally, we also observe the ban on the export of hazardous wastes under the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal and otherwise comply with the provisions of this Convention.

4. IMPLEMENTATION

To uphold Lila Logistik's good reputation, the Code of Conduct must be observed not only during working hours but also during off-duty activities when an employee is perceived by third parties as a representative of the company and the company's interests are thereby affected. We ask all employees to support their colleagues in complying with this Code of Conduct.

Managers are called upon to actively promote the implementation of the Code of Conduct and the value system based on the LILA Charter. This includes ensuring that all employees under their supervision are familiar with the Code of Conduct and the LILA Charter and adhere to them in practice.

Employees support compliance with this Code of Conduct by reporting any necessary concerns to their supervisors or other appropriate channels provided by the company. If employees become aware of a possible violation of this Code of Conduct, they are encouraged to report the violation. No employee shall suffer any adverse consequences as a result of such a report made in good faith, even if the report turns out to be unfounded.

5. VIOLATION

A violation of the MÜLLER | DIE LILA LOGISTIK Code of Conduct may result in sanctions in the form of a written warning. Exceptionally serious violations may even lead to immediate termination of employment, reporting to the relevant authorities, or further legal action.

6. REPORTING SYSTEM

We encourage our employees to report any violations of this Code of Conduct, human rights, or any other laws. To this end, we provide our employees and external parties with a secure reporting channel, which can be accessed via the following link:

<https://www.lila-logistik.com/de/compliance-management-system>

In addition, violations can be reported to the Central Complaints Management Office in writing or by email:

Email: compliance@lila-logistik.com

By mail:

Müller – Die lila Logistik
SE Compliance Committee

Ferdinand-Porsche-Str. 4
74354 Besigheim

These reports are analyzed within the company via a defined process within a specified timeframe, and appropriate measures are initiated.

Reports may be submitted anonymously. In the event that contact information is disclosed in the report, the identity of the reporter will, of course, be treated confidentially. Employees will not suffer any disadvantage as a result of reporting a potential violation. Retaliation or threats against such employees are prohibited. This applies in particular, but not exclusively, if the employee has refused to act in a manner that conflicts with ethical principles.

7. REVISIONS

We regularly review the Code of Conduct, the LILA Charter, and our behavior, and evaluate our experiences to continuously improve our adherence to the values and principles set forth in the Code of Conduct and the LILA Charter.

As of 06/2024

The Executive Board of MÜLLER | DIE LILA LOGISTIK

