SGL THIRD PARTY CODE OF CONDUCT

Version 2.0

❱❱ MAIN PRINCIPLES FOR THIRD PARTIES

The Scan Global Logistics Group ("we," "our," and "us") is a global organisation that offers express and logistic services. Social and environmental considerations are deeply rooted and integrated into our business model and operations in our day-to-day interaction with local communities, customers, employees, and other stakeholders. Thus, we have given ourselves a strict set of ethical values to guide us in our business dealings.

We require all our customers, suppliers, business partners, agents, i.e. all companies who do business with any Scan Global Logistics Group company ("Third Party"), to adhere to the same ethical principles. For this purpose, the Scan Global Logistics Group has drawn up this Third Party Code of Conduct, which sets the standards for doing business with a Scan Global Logistics Group company.

The Third Party shall warrant that its subcontractors and other business partners comply with the terms and conditions in this Third Party Code of Conduct.

❱❱ LAWS AND ETHICAL STANDARDS

The Third Party shall comply with all laws applicable to its business. The Third Party must adhere to the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work, according to national law and practice. This especially applies to – but is not limited to – the below-mentioned topics and compliance initiatives.

❱❱ CHILD LABOR

The Third Party employs no children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted in any case if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development *(reference: ILO Convention 138(7))*.

❱❱ FORCED LABOR AND MODERN SLAVERY

The Third Party shall make no use of modern slavery, forced or compulsory labor and human trafficking. They shall follow the principles set out in the UK Modern Slavery Act 2015, and where required issue yearly statements regarding their

commitments, actions, and risk assessment in relation thereof. The Third Party must not request employees to deposit money or equivalent or original identification documents nor pay recruitment or employment fees or costs.

›› COMPENSATION AND WORKING HOURS

The Third Party shall comply with the respective national laws and regulations regarding working hours, wages, and benefits. We further expect the Third Party to respect the rights to favourable working conditions including a living wage or pay in line with industry standards.

›› MUTUAL RESPECT AND OPENNESS

Employees of the Third Party shall be free to join or not join a union/employee representation of their choice, free from threat or intimidation. The Third Party must respect its employees' rights to collectively bargain in accordance with applicable law.

›› DISCRIMINATION

The Third Party prohibits discrimination based on race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or another status. We further expect the Third Party to consider the diversity of their employees as a strength, and promote an inclusive work environment, where the main criteria for employee selection are skills and qualifications. The Third Party shall take into consideration the health and livelihood of minorities, local communities and indigenous people, and preserve cultural and ritual sites. The Third Party must also commit to respect women's rights and help develop skills and open up opportunities.

›› HEALTH AND SAFETY

We expect the Third Party to strive to implement occupational health and safety standards at a high level. The Third Party complies with applicable occupational health and safety regulations and provides a work environment that is safe and conducive to good health in order to preserve the health of employees and prevent accidents, injuries, and work-related illnesses.

›› BUSINESS CONTINUITY PLANNING

The Third Party shall be prepared for any disruptions of its business (e.g., natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases). This preparedness mainly includes disaster plans to protect employees and the environment as far as possible from the effects of potential disasters that arise within the domain of operations.

›› CONFLICTS OF INTEREST

The Third Party shall maintain high ethical standards in handling conflicts of interest.

›› FAIR COMPETITION

The Third Party must commit to free enterprise and fair competition. Its business must be conducted solely based on merit and open competition. The Third Party and its employees must avoid any conduct that violates antitrust laws.

›› IMPROPER PAYMENTS/BRIBERY

The Third Party shall comply with international anti-bribery standards as stated in the United Nations Global Compact and local anti-corruption and bribery laws. In particular, the Third Party may not offer services, gifts, or benefits to the Scan Global Logistics Group employees to influence employee conduct in representing the Scan Global Logistics Group.

›› ENVIRONMENT

The Third Party shall actively improve energy efficiency in their operations by implementing energy-saving measures, regularly monitoring energy consumption, and striving to reduce their overall energy footprint. They shall also prioritize the use of renewable energy sources where feasible and work toward increasing their share of renewable energy. The Third Party is encouraged to set measurable targets for energy efficiency, procure renewable electricity, and implement strategies to reduce reliance on fossil fuels.

Lastly, we expect our third parties to support the Scan Global Logistics Group's science-based emissions reduction targets (to reduce absolute scope 1 and 2 GHG emissions by 42% by 2030 from a 2021 base year and to reduce scope 3 GHG emissions from upstream transportation and distribution 51.6% per tonne-km within the same timeframe) through the products and services they deliver including providing relevant data on climate protection progress. In this regard, we also expect the Third Party to take climate protection appropriately into account in their own operations and reduce GHG emissions by setting science-based climate targets for themselves and achieving them.

» BUSINESS PARTNER DIALOGUE

The Third Party shall communicate the principles stated in this Third Party Code of Conduct and detailed above to its subcontractors and other business partners, who are involved in supplying the products and services described in the main contract. The Third Party shall warrant that such parties adhere to the same principles.

» ACCOUNTING AND REPORTING STANDARDS

We expect the Third Party's business transactions to be reflected accurately in their accounts in accordance with established procedures and auditing standards, and generally accepted accounting principles. Their accounting records shall reflect and describe the nature of the underlying transactions. The Third Party shall implement and take appropriate measure to prevent counterfeit parts or suspected counterfeit parts.

» PRIVATE OR PUBLIC SECURITY FORCES

If the Third Party engage security personnel, we expect that they respect all internationally recognized human rights, and further ensure that the personnel receive adequate guidance and training. We do not tolerate any unlawful conduct towards employees or third parties.

» CUSTOMS HANDLING

The Scan Global Logistics Group expects the Third Party to act according to the applicable Customs legislations and not participate in any illegal activities. Suppose a Third Party becomes aware of any security breaches when acting as a

part in an international supply chain. In that case, they immediately shall inform the relevant customs authorities and their contact at the Scan Global Logistics Group.

DATA PROTECTION AND DISCLOSURE OF OTHER DATA

The Scan Global Logistics Group expects the Third Party to comply with relevant laws regarding data protection, trade secrets, and other relevant legal frameworks regarding data handling.

TRADE SANCTIONS

The Third Party shall comply with all European Union ("EU"), United Kingdom ("UK"), United States ("US"), United Nations ("UN") and all other applicable trade control-, sanction- and embargo laws, and in no circumstances shall the Third Party be obligated to perform any action penalized or restricted by Export Administration Regulations of the U.S. Commerce Department and the Tax Reform Act of 1976 of the U.S. Treasury Department. The Third Party may not trans-ship, re-export, divert, direct or otherwise make or allow any disposition of equipment, materials, services, technology, technical data, software, or other information or assistance or product thereof furnished by us in violation of all EU, UK, US, UN and all other applicable trade laws, sanctions, or embargoes.

COMPLIANCE WITH THE THIRD PARTY CODE OF CONDUCT

The Scan Global Logistics Group reserves the right, upon reasonable notice, to check the Third Party's compliance with the requirements of the Third Party Code of Conduct. The Scan Global Logistics Group requires the Third Party to implement their own binding guidelines for ethical behaviour.

Any breach of the obligations stipulated in this Third Party Code of Conduct is considered a material breach of contract by the Third Party.

If you have questions related to the Third Party Code of Conduct, please contact our Global General Counsel at hchr@scangl.com.

By signing an agreement as a Third Party with Scan Global Logistics Group, you acknowledge complying with the principles and obligations as set out in this Third Party Code of Conduct.

This Third Party Code of Conduct is hereby accepted and agreed by

Company:

Date:

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Name:

Title: