



# ***Code of Conduct***

Principles for responsible and sustainable conduct for all employees of the nox Group

# ***Foreword and introduction***

## ***Dear employees of the entire nox Group,***

The goal of our business activities at nox is to offer our customers genuine added value while taking into account the interests of society, the environment and our fellow human beings in every respect and at all times.

We bear a special corporate responsibility and are convinced that holistic thinking and action, taking into account social, ecological, and economic challenges, form the fundamental basis for value-adding and sustainable growth.

Our business practices are based on a responsible approach to nature and its resources. We also attach great importance to respectful, fair and co-operative interaction with each other as well as with our partners and customers.

## ***Purpose and significance of the Code of Conduct***

Our Code of Conduct forms the foundation of our daily actions. It serves as a clear guide for legally, ethically and socially correct behavior in our everyday work. Through it, we create a common understanding of integrity, fairness and respect that shapes our actions both internally and externally.

## ***Our joint contribution***

The importance of this code cannot be overstated: it not only protects our company and its reputation, but also creates a working environment in which all employees feel valued, safe, and respected.

By consistently adhering to these principles, we are working together to contribute to the sustainable success of our company. Our code strengthens the trust of our customers, partners, and the public in the integrity of the entire nox Group.

We depend on your responsible cooperation and I thank you for your valuable contribution. Together, we are laying the foundation for a successful, fair and sustainable future for nox.

## **The Management Board**



Alexander Kohnen  
CEO nox Group

# ***Basis and scope***

Our Code of Conduct provides clear guidance for our daily business, protects the reputation and integrity of our company and creates a positive, respectful environment in which all employees take responsibility and contribute to our shared success.



## **Legal basis**

Our Code of Conduct is based, among other things, on the principles of the United Nations Universal Declaration of Human Rights, the UN Global Compact, the core labor standards of the International Labor Organization (ILO) and the Supply Chain Due Diligence Act.



## **International scope**

This Code of Conduct applies without exception to all employees of the entire nox Group at all locations in Germany, Austria, the Netherlands and Belgium. It forms the basis for our daily business and our business relationships.



## **Binding nature**

All employees and managers are obliged to comply with this code. Managers have a special role model function and responsibility for implementation in their areas and throughout the company.

Since responsible conduct is an ongoing process, we regularly review this Code of Conduct and adapt it to current legal requirements and developments as necessary. In such cases, we expect the adapted principles to be complied with. Furthermore, we reserve the right to conduct unannounced visits and investigations to verify compliance with the principles. In this way, we ensure that our standards are maintained and continuously improved.

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## **Questions and support**

If you are unsure about how to apply the Code of Conduct or have questions about its possible impact on our business activities or ethical objectives, please contact your direct manager, the Compliance Committee of the German subsidiary or the Executive Board.

# *Values and corporate mission*

Our corporate values are at the heart of our identity and shape everything we do. They connect us across all departments, locations and national subsidiaries and give our daily business a deeper meaning. The Code of Conduct is the practical implementation of these values in our everyday work.

## **Trust**

We promote a trusting, appreciative work environment with an open feedback culture, where we learn together and use challenges as opportunities.

## **Cohesion**

We promote creative, team-oriented collaboration across disciplines in order to achieve joint success and make targeted use of individual strengths.

## **Respect**

We promote diversity, equality and inclusion and value respectful exchange on an equal footing.

## **Responsibility**

We take responsibility for high quality, work in a solution-oriented manner and continuously improve ourselves in order to achieve sustainable, reliable results.

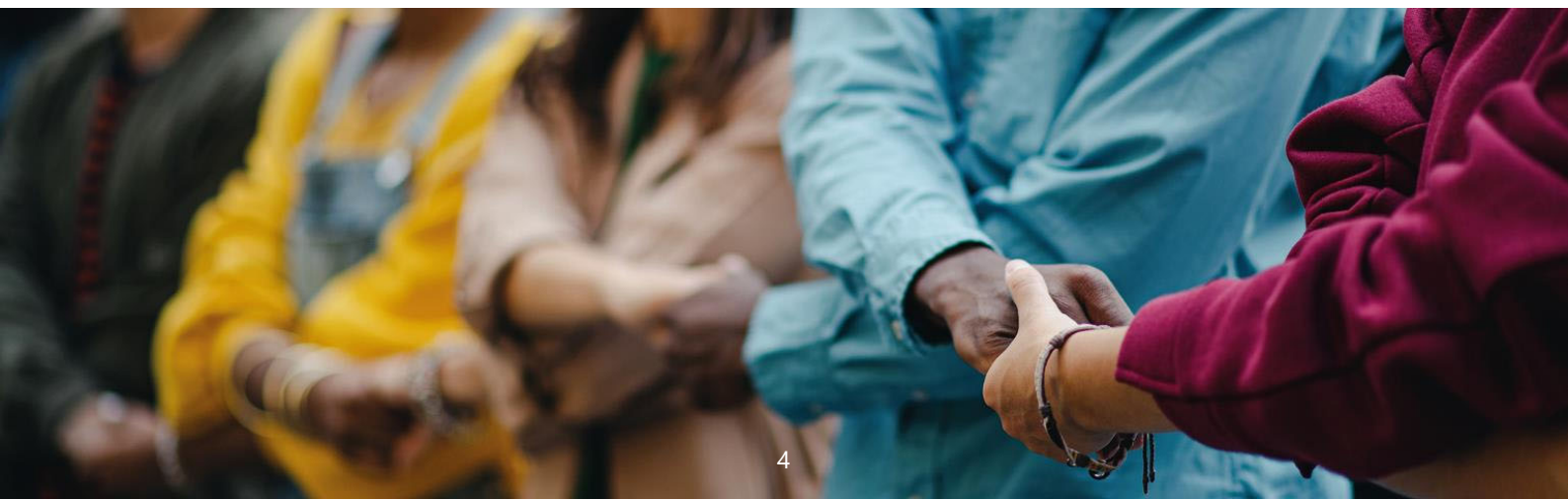
## **Creativity**

We promote a learning, creative and innovative culture in order to remain successful and sustainable in the long term.

## **Transparency**

We promote open, honest and proactive communication as well as a constructive feedback culture.

These values are firmly anchored in our corporate strategy. We want to not only be economically successful, but also make a positive contribution to society. Ethical conduct and social responsibility are not optional extras, but integral parts of our corporate identity. All employees are called upon to actively live and promote these values.



# Integrity and compliance

## Compliance with laws and regulations

For us, it is a matter of course that all nox employees comply with the national and international laws and regulations relevant to our business activities and ensure that they are adhered to.

Compliance is not a burden, but the basis of our trust with customers, partners and the public. Any violation of the law, whether intentional or negligent, not only jeopardizes the company, but also personal integrity and can have serious legal and financial consequences.



01

### Anti-corruption

Zero tolerance for bribery, granting of advantages, or illegal payments of any kind.

02

### Data

Strict compliance with the GDPR and all data protection regulations for the protection of personal data.

03

### Occupational safety

Ensuring safe working conditions and compliance with all occupational safety regulations.

04

### Competition law

Fair competition without illegal agreements, price manipulation or market abuse.

05

### Environmental law

Compliance with all environmental regulations and active contribution to environmental protection.

To ensure compliance with these regulations, we have established internal control mechanisms and appointed compliance officers. They are available to all employees for questions and advice.

If you are unsure about the legality of an action, the following applies:

Ask before you act. It is always better to ask once too often than to make a mistake that cannot be undone.

# Integrity and compliance

Integrity is the foundation of our business success. We are committed to the highest ethical standards in all our business relationships and expect the same from our partners.

Any form of corruption, bribery, or unfair competition contradicts our values and will be consistently punished.



## Fair competition

We compete exclusively on the basis of performance, quality and innovation. Illegal agreements with competitors regarding prices, market sharing or customer distribution are strictly prohibited.



## Zero tolerance for corruption

Any form of bribery, corruption, extortion or embezzlement, as well as any attempt thereof, is prohibited. Our employees avoid conflicts between personal interests and professional duties and do not grant, request or accept any improper advantages, gifts, payments, or other illegal incentives of any kind.



## Gifts and invitations

Gifts, invitations or other benefits must not be used to influence business decisions or create the appearance of influence. Binding internal guidelines apply to the handling of gifts, invitations and other benefits.



## Dealing with conflicts of interest

Employees are obliged to avoid and disclose situations in which personal interests could conflict with the interests of nox. This is the only way to ensure objective decisions. Potential conflicts of interest must be reported immediately to the manager or the compliance committee of the German national company.



## Export controls and Economic sanctions

We comply with applicable national and international laws and regulations on import and export controls, sanctions, embargoes and restrictions on the (re-) export of goods to certain countries.



## Financial responsibility

We manage our financial affairs carefully, transparently and in accordance with all legal and regulatory requirements. Financial decisions are based on verifiable information and serve the long-term success of the company. Irregularities are consistently avoided and reported immediately if suspected.



# ***Integrity and compliance***

## **Dealing with business partners**

Integrity and fairness characterize our business relationships. We cultivate long-term partnerships based on mutual trust, transparency and respect.

Our competitive success is based solely on the quality of our products and services, never on unfair methods, corruption or bribery.



## **Quality, cost-effectiveness and customer satisfaction**

Our corporate responsibility and our holistic approach to thinking and acting, taking social, environmental, and economic challenges into account, form the fundamental basis for value-adding and sustainable growth. Our customers' quality requirements are our top priority within the framework of our network integrity and we are therefore committed to promoting the continuous improvement of our processes and services. We believe in partnership and therefore actively involve our customers in the development of new products and services.

### **Integrity as the foundation of our business relationships**

All employees represent the products and services of nox in their dealings with business partners.

Therefore, the principles of the Code of Conduct must always be observed. We always act with integrity in our business relationships. We therefore also expect our partners, suppliers, transport companies and their drivers to comply with applicable laws and the principles of this Code of Conduct. Details are set out in our Code of Conduct for Business Partners.

We always maintain transparent and sincere dealings with governments, authorities and political interest groups, taking into account the applicable law.

# ***Human rights and fair working conditions***

The principles of the United Nations Global Compact serve as our guide and we ensure that human rights are respected within our sphere of influence at all times. We consider the dignity and rights of every human being to be inviolable and they form the basis of our corporate culture.

1

## **Prohibition of child and forced labor**

We do not support or tolerate any form of child or forced labor.

Taking into account applicable national law, we respect the principles of the International Labor Organization (ILO) on fundamental rights and principles at work.

2

## **Fair remuneration**

We comply with statutory minimum wage requirements and promote fair, appropriate, and transparent remuneration. We are committed to equal pay and fair remuneration - equal pay for equal or equivalent work, regardless of gender or origin.

3

## **Non-discrimination**

We do not tolerate any discrimination based on gender, age, skin color, culture, ethnic or social origin, genetic characteristics, language, religion or belief, political or other opinion, membership of a national minority, property, birth, disability, sexual orientation, or gender identity.

4

## **Freedom of association**

We respect our employees' right to form or join trade unions and their right to collective bargaining. No one may be disadvantaged for exercising these rights.



# ***Health, safety and well-being***

Our employees make a significant contribution to the economic success of our company. That is why the well-being and safety of our employees is very important to us. Compliance with applicable occupational health and safety laws and internal occupational health and safety guidelines relating to working hours, occupational safety and health protection is a matter of course for us. We are constantly working to develop appropriate procedures and protective measures to ensure health and safety in the workplace and carry out preventive work within our area of responsibility. Through effective risk and emergency management, we protect our processes and the health and safety of our employees against hazardous situations.



## **Zero tolerance for drugs and alcohol**

The consumption and possession of illegal drugs is prohibited throughout the company.

The consumption of alcoholic beverages is generally not permitted. Exceptions for company celebrations or official events are only permitted within reasonable limits and with prior approval.

## **Cannabis in the workplace**

Despite the legalization of cannabis in some countries, its consumption during working hours or appearing under its influence is strictly prohibited.

All employees are required to be in a condition during working hours that enables them to perform their duties safely and productively.

## **Mental health**

We promote a work environment that supports mental health.

Bullying, harassment, or other forms of psychological violence will not be tolerated.

We offer support programs for employees in stressful situations.

## **Smoking and vaping**

Smoking and vaping (e-cigarettes) are only permitted in designated areas. We support employees who want to reduce or quit their consumption of nicotine or other addictive substances.

# ***Appropriate behavior in the workplace***

Respectful and professional interaction is the basis for a productive and pleasant working environment. We expect all employees to behave in a manner characterized by honesty, professionalism, mutual respect and team spirit. This applies both to daily interactions with one another and to collaboration on joint projects. Our behavior shapes our corporate culture. We all share responsibility for creating a working environment in which everyone feels comfortable and can develop their full potential.

## **Zero tolerance for discrimination and harassment**

We are committed to resolutely opposing any form of discrimination, harassment, threat, or abuse. We reject any form of discrimination, exclusion or restriction that leads to or aims to impair or prevent the equal recognition, enjoyment or exercise of human rights and fundamental freedoms by men and women. We do not tolerate harassment, whether verbal, physical or psychological. This includes inappropriate comments, unwanted physical contact, bullying and any form of intimidating or humiliating behavior.

## **Promoting diversity and inclusion**

We value diversity as an asset and actively promote an inclusive working environment in which all employees can contribute and develop. Different perspectives make us stronger and more innovative. For us, this is an important foundation for a customer-oriented, successful service company.

### **On company premises**

- ▶ Appropriate clothing and appearance
- ▶ Respectful tone and professional communication
- ▶ Compliance with house rules and safety regulations
- ▶ Consideration for shared spaces

### **At business events**

- ▶ Representing the company in a dignified manner
- ▶ Responsible consumption of alcohol
- ▶ Maintaining professional boundaries, even in informal settings
- ▶ Treating business partners and guests with respect



# ***Environmental protection and sustainability***

As part of our responsibility, we pursue an integrated approach to sustainability and environmental protection. Our integrated management system supports us in analyzing potential environmental impacts so that we can effectively counteract any negative effects on our environment. The aim is to strike a balance between ecological, social, and economic sustainability.



## **Conservation of resources**

We are committed to the efficient and careful use of natural resources. This includes reducing energy and water consumption, minimizing waste and promoting the circular economy. All employees are encouraged to actively contribute to the conservation of resources.



## **Climate**

We are committed to continuously reducing our greenhouse gas emissions. We are actively working to achieve our climate goals by continuously optimizing our processes, modernizing our vehicle fleet and using renewable energies.



## **Waste management**

The proper separation and disposal of waste is mandatory for all employees. Waste is treated and disposed of in accordance with legal regulations. Our waste management follows the circular economy principle: avoidance, reduction, reuse, recycling.



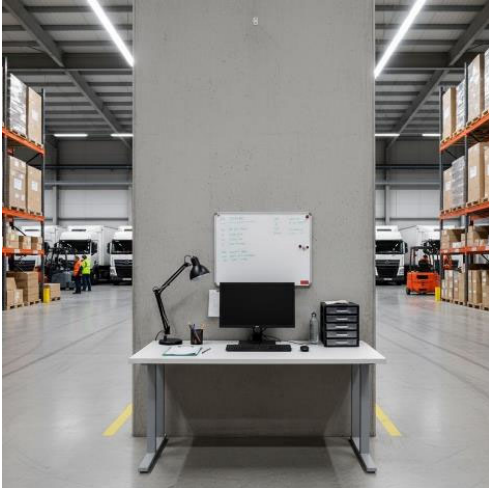
## **Sustainable innovation**

We promote innovations that contribute to more sustainable business practices. This includes the development of environmentally friendly services, the implementation of energy-efficient technologies and the continuous improvement of our environmental performance.

Through effective stakeholder management, we combine maximum customer benefit, sustainable economic growth, the highest safety standards and the greatest possible environmental and climate compatibility.



# Handling company resources



We always handle our company resources, intellectual property and other nox assets responsibly.

We use company property exclusively for its intended business purposes.

Misuse for other purposes, e.g., for inappropriate personal or illegal purposes, is prohibited. Using these resources carefully and responsibly is not only an economic necessity, but also an expression of our respect for our company and our colleagues.

## Careful use

Careful handling of equipment, machines and materials to avoid damage and waste

- ▶ Proper operation of work equipment
- ▶ Regular maintenance and care
- ▶ Reporting defects and malfunctions

## Purpose-specific use

Use of company resources exclusively for professional purposes, unless otherwise specified

- ▶ Use of IT systems for work purposes
- ▶ No improper private use
- ▶ Compliance with internal usage guidelines

## Sustainable use of resources

Conscious and economical consumption of energy, paper and other materials to protect the environment

- ▶ Avoidance of unnecessary printing
- ▶ Energy-saving behavior
- ▶ Waste separation and recycling

**Sustainability starts small:** every contribution to resource-efficient working counts. Whether it's turning off lights and devices, printing on both sides of the paper, or using reusable containers - together we can make a significant difference.

IT systems and digital tools are particularly worthy of protection. Installing private software, circumventing security measures or sharing access data jeopardizes the security of our entire IT infrastructure and is therefore strictly prohibited.

# Confidentiality and data protection

In an increasingly digitalized business world, data protection and information security are of crucial importance. We are committed to treating the personal data of our employees, customers and business partners with the utmost care and to protecting it from unauthorized access, loss, or misuse.



All employees are obliged to protect company and customer data from unauthorized access, loss, or misuse. This includes both digital and physical documents. Confidential information must not be shared with unauthorized persons, either inside or outside the company. Particular caution is required when talking in public places, using public Wi-Fi networks or transporting documents.

## Information security

Trade secrets such as development plans, strategies, financial information or customer relationships are particularly worthy of protection. The disclosure of such information can cause considerable damage to the company. This confidentiality obligation continues to apply even after the end of the employment relationship.

## Cybersecurity

We implement comprehensive security measures to protect against cyberattacks, data loss and unauthorized access. All employees receive regular training on cybersecurity risks and are required to report suspicious activity immediately.

## GDPR compliance

We strictly adhere to the provisions of the GDPR and the national data protection laws relevant to our business activities. Personal data is processed exclusively on a lawful basis and only for specified, explicit and legitimate purposes. If you have any questions about data protection our data protection officer is available at any time.

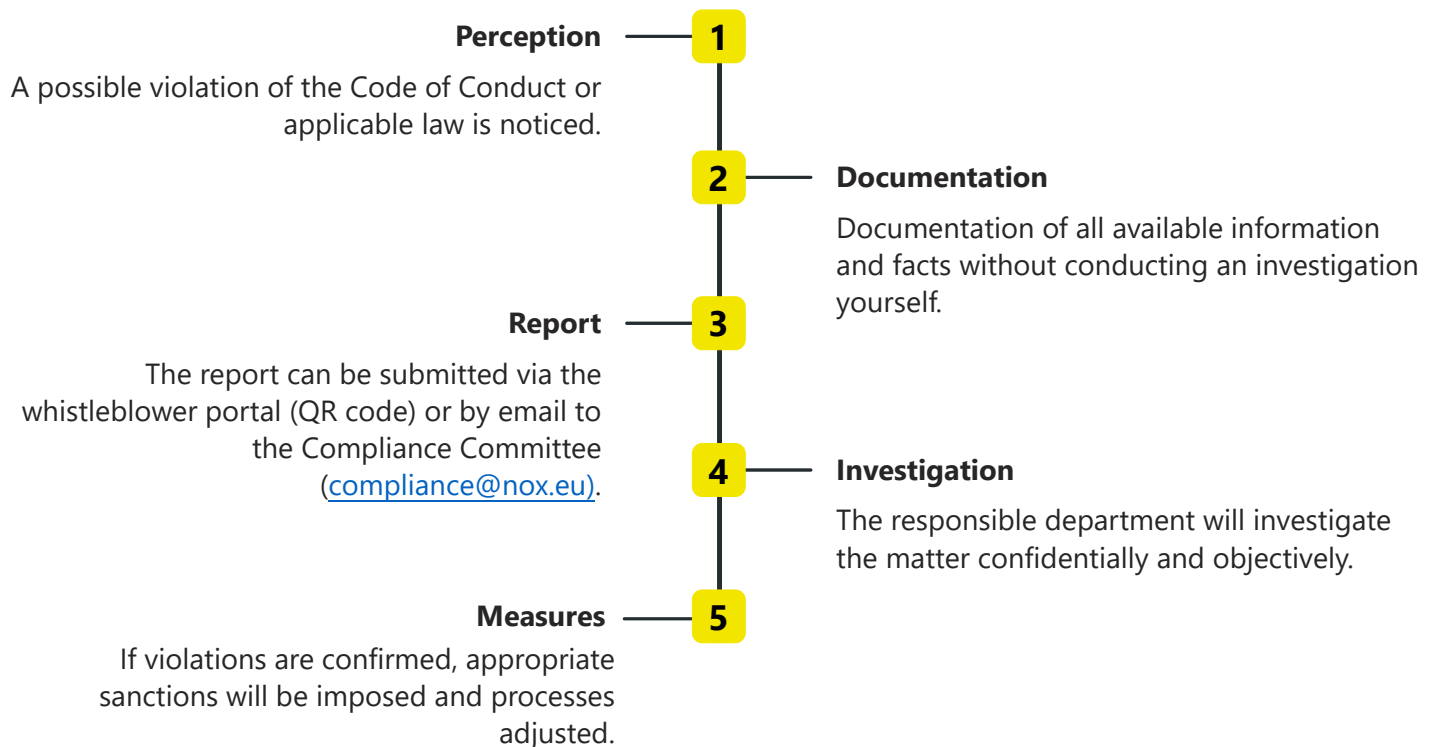
# Responsible use of artificial intelligence

The use of artificial intelligence (AI) offers enormous opportunities for innovation and increased efficiency. At the same time, this technology comes with a special responsibility. We are committed to the ethical, transparent and responsible use of AI technologies in all areas of our business activities.

1	<b>Transparency and traceability</b> The use of AI systems must be transparent and traceable. Employees and affected individuals must be informed about the use of AI. AI-supported decisions that have a significant impact on individuals must be explainable and verifiable by humans.
2	<b>Fairness and non-discrimination</b> AI systems must not lead to discrimination or unfair treatment. We regularly check AI algorithms for possible bias and ensure that they work fairly and impartially. Particular attention is paid to avoiding discrimination based on protected characteristics.
3	<b>Data protection and AI</b> The use of AI systems is strictly compliant with the General Data Protection Regulation. Personal data used for training or operating AI systems must be collected and processed lawfully. The principles of data minimization and purpose limitation are observed.
4	<b>Human oversight and responsibility</b> AI systems serve as support tools, but do not replace human judgment and responsibility. Critical decisions, especially those affecting employees or business partners, are always subject to final review and decision by humans.
5	<b>Responsible use of generative AI</b> The use of generative AI tools (such as ChatGPT) requires special care. Confidential or sensitive company information must not be entered into public AI systems. The results of generative AI must be critically reviewed for accuracy, appropriateness and possible legal violations.
6	<b>Continuous evaluation and improvement</b> We continuously evaluate the AI systems we use in terms of their performance, security and ethical implications. Employees receive regular training on the responsible use of AI. We stay informed about technological and regulatory developments and adapt our practices accordingly.

# Reporting violations and protection of whistleblowers

An open corporate culture in which misconduct can be addressed is essential to our integrity. We expressly encourage all employees to report perceived or suspected violations of this Code of Conduct, laws or internal guidelines without fear of negative consequences. Whistleblowers who report violations in good faith make a valuable contribution to protecting the company and all employees. They are protected from any reprisals: this is not only a voluntary commitment, but also enshrined in law.



## Anonymous reporting

Reports can also be submitted anonymously via the online portal.

The identity of the person reporting remains protected.

## Confidential treatment

All reports are treated as strictly confidential. Information is only passed on to those responsible for the investigation.

## Protection against reprisals

Whistleblowers are protected from discrimination, disadvantage, or other negative consequences, regardless of the outcome of the investigation.

Investigations into reported violations are conducted systematically, objectively, and with due regard for the rights of all parties involved. Confirmed violations are consistently punished and may have consequences under labor law, criminal law, and civil law.

However, our primary goal is not to punish, but to prevent misconduct and promote a culture of compliance.



# ***Closing remarks and Declaration of Commitment***

This Code of Conduct is more than just a document. It is an expression of our shared values and the standards we set for ourselves. It forms the foundation for trusting relationships, successful collaboration and sustainable corporate success.

All employees actively contribute to shaping our corporate culture through their behavior.

## **100%**

### **Commitment**

All employees are committed to this code.

## **1**

### **Shared culture**

A corporate culture that connects us all.

## **24/7**

### **Living our values**

Integrity and respect every day, at all times.

Compliance with this Code of Conduct is not a chore, but an investment in our shared future. It protects not only the company, but also our employees.

By living these principles, we create a working environment in which we can be proud to be part of the nox team. Each and every one of us contributes to bringing these values to life in our everyday work.

That is why the following applies to all of us:

- ▶ Be a role model for your colleagues.
- ▶ Address misconduct.
- ▶ Ask questions when you are unsure.
- ▶ Actively contribute to a culture of openness, respect and integrity.

# Information sheet

As employees of nox, we always act with integrity, respect and in compliance with the law. Our actions are based on internal guidelines as well as internationally recognized standards and laws.

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## Principles of the United Nations Universal Declaration of Human Rights

The United Nations Universal Declaration of Human Rights, which consists of 30 articles, deals with the fundamental rights to which every human being is entitled.

Many countries have incorporated human rights into their constitutions. In Germany, human rights are enshrined in the Basic Law.

Sources: <https://www.un.org>, <https://www.menschenrechtserklaerung.de>

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## United Nations Global Compact (UN Global Compact)

The Supply Chain Due Diligence Act stipulates that affected companies must endeavor to ensure that no human rights violations occur in their own business activities or in their supply chain.

Source: <https://www.taylorwessing.com/>

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## UN Convention on the Rights of the Child

The UN Convention on the Rights of the Child is a set of rules established by the United Nations that emphasizes the needs and interests (e.g., the right to education or the right to protection from violence) of all children worldwide. Every child needs special protection and care in order to develop healthily.

Source: <https://www.unicef.de>




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## UN Convention on the Elimination of All Forms of Discrimination Against Women

The UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) is an international agreement of the United Nations to eliminate all forms of discrimination against women. It is the most important international agreement for the protection of the rights of girls and women.

Source: <https://www.unwomen.de>

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## Core labor standards of the International Labor Organization (ILO)

The core labor standards of the International Labor Organization are based on five fundamental principles that are intended to ensure humane working conditions and adequate protection. The specific details of these fundamental principles can be found in ten conventions, which are referred to as core labor standards.

Source: <https://www.ilo.org>

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## Supply Chain Due Diligence Act

The Supply Chain Due Diligence Act stipulates that affected companies must endeavor to ensure that no human rights violations occur in their own business operations or in their supply chain.

Source: <https://www.taylorwessing.com/>

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