

Code of Conduct

Code of Conduct for Business Partners of
the nox Group



Intro by the Management

Dear business partners,

Our business activities are designed to create real added value for society, the environment, and our fellow human beings. We bear a special corporate responsibility and are convinced that holistic thinking and action, taking into account social, ecological, and economic challenges, form the basis for sustainable growth. Our business practices are based on the responsible use of nature and its resources. We also attach great importance to treating our employees, partners, and customers with respect, fairness, and partnership.

This Code of Conduct is based on the following guidelines:

- ▶ Principles of the United Nations Universal Declaration of Human Rights
- ▶ UN Global Compact and the 17 Sustainable Development Goals (SDGs)
- ▶ Core labor standards of the International Labor Organization (ILO)
- ▶ Supply Chain Due Diligence Act (LkSG)
- ▶ UN Convention on the Rights of the Child
- ▶ UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)

It defines the minimum requirements for social, environmental, ethical, and human rights obligations and thus forms the basis for trusting and long-term cooperation with the entire nox Group in Germany, Austria, the Netherlands, and Belgium.

We expect our business partners to share these principles, actively implement them, and pass them on to their own suppliers and employees.

We review this code regularly 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 carry out unannounced visits and investigations to verify compliance with the principles. In this way, we ensure that our standards are maintained and continuously improved.

We understand that achieving these standards is an ongoing process. Nevertheless, a violation of this code may be grounds for termination of the business relationship.

Thank you for your cooperation and partnership!



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Alexander Kohnen
CEO, nox Group

Value orientation & corporate culture

Our corporate values are at the heart of our identity and shape everything we do. We expect our business partners to share and promote the values of the nox Group.



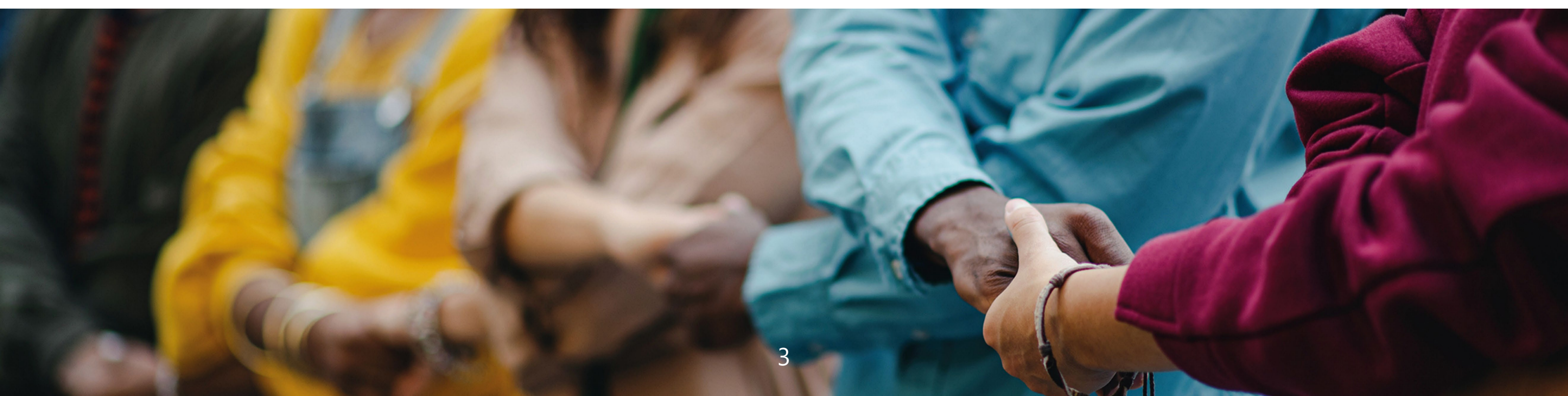
Health, safety, and well-being

Equal treatment and prohibition of discrimination

All people must be treated equally. Discrimination based on gender, age, origin, skin color, religion, sexual orientation, disability, pregnancy, political or trade union beliefs will not be tolerated. Business partners promote equal opportunities and ensure a respectful working environment. They respect the personal dignity, privacy, and rights of all people. Artificial intelligence or digital systems may only be used on the basis of fair, non-discriminatory data.

Protection from violence and harassment

Physical, psychological, or sexual violence, intimidation, bullying, or harassment are not tolerated in any form. All employees must be treated with respect. Every person has the right to a safe and dignified working environment, free from fear, threats, or inappropriate behavior.



Prohibition of child labor

Child labor is strictly prohibited. Business partners may not employ anyone younger than 15 or younger than the minimum age applicable in their country. Young people under the age of 18 may not perform any work that is dangerous or hazardous to their health. This obligation also applies to all downstream stages of the supply chain.

Prohibition of forced labor and modern slavery

Any form of forced or compulsory labor, human trafficking, debt bondage, or modern slavery is prohibited. All employees must be able to take up and terminate their employment voluntarily. No one may be forced to work through financial dependence or intimidation.

Fair working conditions (Remuneration and working hours)

Employees are entitled to fair wages that meet at least the statutory minimum wage and enable them to earn a decent living. Statutory working time regulations must be observed, overtime must be recorded and fairly remunerated. All social security contributions and benefits must be paid in full and on time. Employees may only be hired with a valid work permit.

Freedom of association and the right to collective bargaining

Our business partners respect the right of their employees to organize themselves into unions, form employee representatives, and conduct collective bargaining without fear of discrimination or reprisals. Even in countries where such rights are restricted by law, open communication should be encouraged.





Rights of indigenous peoples and local communities

Our business partners respect the rights of indigenous peoples and local communities affected by their business activities. They act in such a way that no unlawful land seizures, environmental destruction, or cultural damage occur. Projects that affect the land or lives of these communities may only be implemented with their free, prior, and informed consent (FPIC).

Use of private or public security forces

If security forces are deployed, this is done exclusively to protect the safety of persons, facilities, and property. The human rights and dignity of each individual must be respected at all times. The use of force may only be used as a last resort and within the framework of applicable laws.

Dealing with conflict minerals and critical raw materials

Business partners must ensure that they do not source raw materials from conflict or high-risk areas that contribute to the financing of violence, human rights violations, or corruption. For materials such as tin, tantalum, tungsten, gold, and other critical raw materials, evidence and due diligence processes in accordance with the OECD guidelines are required. Business partners only work responsibly with certified smelters and refiners.



Right to occupational health and safety

Health and safety are top priorities. Business partners comply with all national and international regulations on occupational health and safety. They create safe workplaces, provide appropriate protective equipment, and take measures to prevent accidents and illness. This includes promoting mental health, preventing stress, and protecting against bullying, violence, and harassment. Drug and alcohol abuse during working hours is prohibited.

Prohibition of drugs and alcohol

The consumption, possession, or carrying of alcohol, drugs, or other intoxicating substances is strictly prohibited on all nox Group premises. Employees, drivers, visitors, and business partners must be fully capable of working and free from the influence of such substances while on the premises.

Behavior on the nox Group premises

The rules of occupational safety and health protection apply throughout the nox Group's premises. All persons on the premises undertake to comply with these rules and to act with due care. Violations of these regulations may result in denial of access to the premises, criminal prosecution, or exclusion from cooperation.

- ▶ **Personal protective equipment:** In all transshipment halls and ramp areas, safety or protective footwear and a visibly worn high-visibility vest are mandatory.
- ▶ **Access & ID cards:** Access to the premises is only permitted with a valid visitor or driver ID card, which must be worn in a clearly visible manner.
- ▶ **Registration & accompaniment:** Visitors must register at the gate and may only enter the premises with the consent or in the company of nox employees.
- ▶ **Instructions & regulations:** The safety instructions of the staff must be followed at all times; all occupational safety and fire protection rules must be observed.
- ▶ **Proof of identity:** A valid official ID card must be carried and presented on request.
- ▶ **Conduct & behavior:** A respectful tone, professional communication, and consideration in shared areas must be observed.

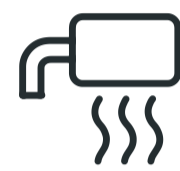
Environmental protection and sustainability

We take responsibility for protecting our environment and promoting sustainable development. Our goal is to balance ecological, social, and economic aspects and minimize the negative impact of our activities. Together with our business partners, we want to conserve resources, reduce emissions, and promote innovations that enable a sustainable future. Our business partners contribute to continuously improving environmental performance and communicating progress transparently. We see sustainability as a shared responsibility-today and for future generations.



Conserving resources

Promoting resource efficiency, waste prevention, and the circular economy through the responsible use of materials and energy.



Climate

Reducing greenhouse gas emissions, using renewable energies, and promoting climate-friendly technologies in all business processes.



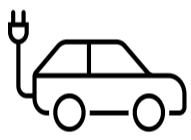
Waste management

Waste is recycled or disposed of properly and in compliance with legal requirements.



Energy and resource efficiency

Economical use of energy, water, and raw materials and promotion of the use of renewable energies.



Efficient logistics

Reduction of emissions and empty runs through optimized transport processes and the use of alternative drive systems.



Sustainable innovation

Development and implementation of sustainable solutions that reduce environmental impact and contribute to achieving the nox Group's climate targets.



Biodiversity and nature conservation

Supporting the preservation of biological diversity and avoiding interventions that damage ecosystems or natural habitats.

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.

Integrity & Compliance / Business Ethics

Fair, lawful, and responsible conduct is the basis of all cooperation with the nox Group. Our business partners undertake to comply with all laws, regulations, and the principles set out in this Code.

Prohibition of corruption and bribery

You shall refrain from any form of corruption, bribery, and improper granting of advantages, including through third parties. Gifts, invitations, or benefits may neither influence business decisions nor give the appearance of influencing them.

Export controls and economic sanctions

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

Financial responsibility

You shall ensure correct, complete, and traceable accounting in accordance with statutory accounting regulations and recognized accounting principles.

Intellectual property and plagiarism

You respect intellectual property rights and protect confidential information and customer data. Technology and knowledge exchange only takes place in a legally permissible manner. Plagiarism may not be produced, used, or acquired.

Data protection, information security, and artificial intelligence

- ▶ Compliance with all relevant data protection laws, in particular the GDPR
- ▶ Protection of confidential information and personal data against unauthorized access or loss
- ▶ Use of information exclusively for legitimate, lawful purposes
- ▶ Information security: Business partners shall take appropriate technical and organizational measures to protect their systems
- ▶ Artificial intelligence: AI systems may only be used in a responsible, transparent, and ethical manner. Decisions must remain verifiable.



Tips and reports (whistleblowing)

Together with our business partners, we promote an open corporate culture in which misconduct can be addressed.

Such a culture is essential for our shared integrity. Our business partners therefore report any suspicions they or their employees may have that nox employees or persons acting for or on behalf of nox have engaged in illegal or otherwise unauthorized activities.

nox guarantees confidentiality and, upon request, anonymity for the persons reporting and the facts reported. 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 result in consequences under labor, criminal, or civil law.

However, the aim is not to punish, but to prevent misconduct and promote a culture of compliance.

Anonymous reporting

Reports can also be submitted anonymously via the online portal. The identity of the reporter 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.

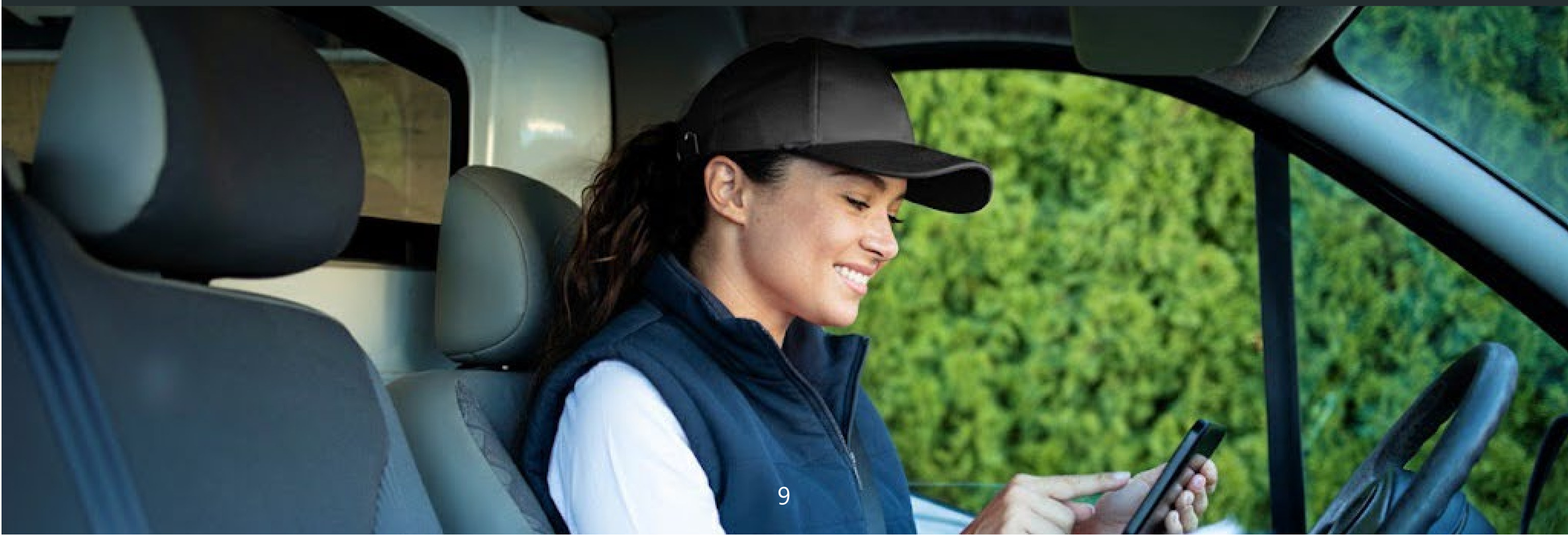


Our business partners use the digital whistleblower portal at

www.whistleblowersoftware.com/secure/group-nox

or send an email to

compliance.nox@intake.whistleblowersoftware.com



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