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gültig: **09.10.25** 

# Introduction to the Code of Conduct for suppliers and subcontractors

Transdanubia Speditionsgesellschaft m.b.H. (short "Transdanubia") considers sustainability to be an integral part of its business processes. As an international logistics company providing forwarding and transporting solutions, we rely on purchasing services from our partners and subcontractors, to ensure the sustainable success of our customers.

The basis for this is a responsible and long-term oriented corporate governance. We therefore integrate our business partners directly into our sustainability strategies. Whilst sourcing, we do not only pay attention to process-, economic- and technical criteria, but also to social, environmental and ecological aspects like human-rights, working conditions, corruption prevention and environmental protection.

In the area of tension between product/performance, market, regions and processes; costs, reliability and innovation are essential factors to evaluate eventual suppliers and to decide whether to cooperate.

This Code of Conduct defines the minimum requirements of Transdanubia to all suppliers of services and goods, in relation to their responsibilities for society, workforce and environment. Transdanubia reserves the right to apply modifications to this Code of Conduct in case of reasonable changes within its corporate governance and expects suppliers and partners to accept and adhere to these changes.

Transdanubia expects that its partners provide their service in full accordance with all applicable laws and regulations, the principles the United Nations Global Compact and this Code of Conduct. Furthermore, it is expected that adequate policies and procedures are implemented which ensure and monitor the compliance to applicable law by all suppliers and a continuing improvement to meet Transdanubia's standards and demands as defined in this Code of Conduct.

We oblige our contractors to ensure that all companies affiliated to them also know and comply with the principles outlined in this agreement. For the purposes of this declaration, "affiliated companies" are defined as companies in which at least fifty percent (50 percent) of the voting share capital is directly or indirectly owned by the other company.

#### Staff members & workforce

Transdanubia expects its suppliers to adhere to all applicable national laws, ensuring full compliance with employee rights. In addition, we demand the acknowledgment of the coreprinciples on labour, as defined by the International Labor Organization (ILO), considering the laws and legal forms of relevant countries and locations.

#### **Child labour**

Transdanubia expects that its suppliers prohibit and to refrain from any means of child labour within its company.

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## Discrimination

Transdanubia obliges its suppliers to promote equality of opportunity and equality of treatment, as well as to prevent any form of discrimination upon hiring of workforce, promotion or possibilities to gain further education. No staff member must be subject to discrimination due to sex, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation or views.

#### Forced labour

Transdanubia expects all partners and suppliers to prevent any means of forced labour within their company.

## Freedom of assembly

Transdanubia expects all its partners and suppliers to act in accordance with international laws and to respect the right of their workforce, to form an employee representative body and to conduct collective bargaining.

#### Renumeration and worktime

Transdanubia obliges its suppliers to comply with all respective national laws concerning working time. Furthermore, it is expected that all supplier's employees receive salaries and wages, that are in accordance with all applicable national laws.

# Health protection and work safety

Transdanubia expects that its suppliers work in full accordance with all applicable laws and regulations concerning work health and work safety. In addition, we encourage our suppliers to establish and keep an adequate work safety management system (e.g. according to OHSAS 18001). This on one hand implies minimizing actual and potential work safety risks, as well as training of all staff members to prevent accidents and occupational illnesses.

### **Environmental protection**

Transdanubia demands from its suppliers to strictly comply with all applicable national and international laws and regulations concerning environmental protection. Furthermore, suppliers are expected to establish and keep up an adequate system on environmental protection (e.g. according to the ISO 14001 standard or comparable), aiming to minimize the environmental impact and threats to the environment caused by their respective businesses.

### **Prohibition of corruption and bribery**

Transdanubia expects any business partner to not tolerate any form of corruption and to ensure full compliance with all applicable anti-corruption laws, as well as to ensure compliance with all conventions by the United Nations (UN) and the Organisation for Economic Cooperation and Development (OECD) on combating corruption.

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The business partners specifically ensure that their employees, subcontractors, or representatives do not offer, promise, or grant any advantages to Transdanubia employees or related third parties, with the aim of obtaining an order or other preferential treatment in business transactions.

#### Gifts and invitations

Transdanubia expects its suppliers not to abuse invitations and gifts to exert influence. Invitations and gifts to Transdanubia employees or persons close to them must only be granted upon reasonable cause and with an appropriate value, i.e. they are of low value and are deemed to be usual in the local business conduct. Suppliers must not ask Transdanubia employees to grant them inappropriate advantages.

#### **Conflicts of interest**

Transdanubia expects its suppliers to make decisions relating to their business activities with Transdanubia, based solely upon objective criteria. Conflicts of interest due to other economic activities, or private interests, including those of relatives or other related persons or organizations, are avoided from the outset.

### **Free Competition**

Transdanubia expects that its partners and suppliers are dedicated to free competition, behave fairly and comply to all applicable cartel laws and regulations. Suppliers neither create or are part of cartels, nor do they abuse a potential market dominating position they might have.

#### Money laundering

Transdanubia expects that its suppliers comply with all applicable laws and regulations concerning money laundering prevention and financing of terrorism, and do not participate in any money laundering activities.

## Subcontractors and suppliers

Transdanubia expects all its suppliers to choose their contractual partners based upon the rules defined herein and that they communicate these principles to their subcontractors and suppliers and to bind them to comply. Suppliers shall encourage their subcontractors and suppliers to comply with the standards described in this Code of Conduct regarding human rights, working conditions, corruption prevention and environmental protection in the fulfilment of their contractual obligations.

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# Compliance with the Transdanubia Code of Conduct

Any violation of the rules and principles set out in this Code of Conduct are deemed to be a material breach to the contractual agreement by the supplier. In relation to suppliers who demonstrably are not complying with the provisions of this agreement or do not reach significant improvement after an appropriate deadline was set, Transdanubia has the right to terminate single or all existing contracts without further notice.

## Declaration and confirmation by the supplier / subcontractor

By accepting orders by Transdanubia or agreeing on contracts, the supplier concludes to comply with the principles set out in this Code of Conduct as follows:

- The supplier confirms to have received this Code of Conduct to comply with all principles and rules defined herein.
- The supplier confirms to provide a written self-declaration proving full compliance upon request, within an adequate time frame, unless laws or contractual duties, especially obligations of confidentiality, are violated, or the protection of trade and business secrets is compromised.
  - This obligation to provide a written self-declaration applies in particular in cases of reasonable suspicion of non-compliance with the principles and requirements of the Transdanubia Code of Conduct (e.g. negative media reports about the supplier or its supply chain).
- The supplier confirms to forward the provision of this Code of Conduct to all its suppliers and subcontractors within the supply chain of services of Transdanubia, to require them to fully comply with Transdanubia's rules and to legally bind them to do so.
- The supplier confirms to agree that this declaration is subject to the substantive law under which the contracts with Transdanubia are concluded.

Violations of the provisions of the Code of Conduct of Transdanubia can be reported to below mail address:

compliance@transdanubia.com

AT-Guntramsdorf, on the 09.10.2025

Andre as Scherbaum

CEO Transdanubia

Friedrich Simlinger CEO Transdanubia Günter Lehner CEO Transdanubia

TRANSDANUBIA

Speditionsgesellschaft m.b.H.

A-2353 Guntramsdorf, Industriestraße 3

Firmenbuchgericht: Landesgericht Wiener Neustadt, FN 31495 t Rechtsform: Gesellschaft m.b.H.