

Code of Conduct



for employees.

Together in motion.

Lagermax Group – Code of Conduct

Lagermax Lagerhaus und Speditionen AG
Version 3.0 | 13 October 2025

"Together in motion - we connect the world sustainably with customised logistics services."

For over 100 years, the Lagermax Group, an international family-owned logistics company, has provided customised, sustainable logistics solutions for people, markets, and businesses. We see ourselves as a reliable and responsible partner for our employees, customers, business partners, and society.

This Code of Conduct reflects our shared commitment to integrity, lawful conduct, and ethical responsibility. It defines binding principles that guide our daily actions – in compliance with applicable laws, internationally recognised standards, and our corporate values.

Our corporate values form the foundation of this policy:



People Driven: We create a respectful, fair, and healthy working environment, contributing to environmental protection and quality of life.



United in Diversity: Diverse perspectives and skills strengthen our ability to innovate and develop environmental solutions across teams, locations, and national borders.



Future-minded: As a family-owned company with a long-term perspective, we act responsibly to drive innovation, advance digitalisation, and protect natural resources for future generations.

Management endorsement and scope

This Code of Conduct, endorsed by the Executive Board of the Lagermax Group, reflects our commitment to responsible and sustainable business practices.

It is binding for all employees, managers, subsidiaries, and entities worldwide. Every employee must know, understand, and follow the principles in daily work. Managers are expected to lead by example, uphold ethical conduct, and foster a culture of integrity. Managers are responsible for ensuring that employees within their area of responsibility

understand and comply with this Code and that compliance obligations are systematically implemented and reviewed.

The Code also applies to contractors, suppliers, and other business partners, who are contractually required to comply with its standards or equivalent rules. Compliance with this Code is a prerequisite for any business relationship with the Lagermax Group.

We act with integrity, transparency, and care. Violations will not be tolerated and will be addressed promptly and consistently

We are committed to delivering reliable, safe, and high-quality services that meet applicable legal and regulatory requirements as well as agreed customer expectations. We continuously improve our processes to increase customer satisfaction and operational excellence.

International standards & commitments

Our commitment to responsible and sustainable business practices is guided by internationally recognised standards, including the UN Global Compact (UNGC), the UN Guiding Principles on Business and Human Rights (UNGPs), the ILO Core Labour Standards, the OECD Guidelines for Multinational Enterprises, and the Science Based Targets initiative (SBTi).

We respect and promote human rights, ensure fair working conditions, and align our climate actions with Net Zero 2050 ambitions. Preventing, mitigating, and addressing potential negative impacts on people and the environment in our operations and supply chains is fundamental to our approach.

Alignment with double materiality & ESRS

This Code of Conduct is closely aligned with the results of our double materiality assessment, conducted in accordance with the European Sustainability Reporting Standards (ESRS).

The assessment evaluated:

1. Impact Materiality – how our business activities affect people, society, and the environment.
2. Financial Materiality – how sustainability risks and opportunities impact our business performance and long-term value creation.

The most material topics and IROs (Impacts, Risks, and Opportunities) relevant to our business are reflected in this Code of Conduct, including:

- Environment (E): Climate change mitigation & GHG reduction (E1) Air & water pollution, including microplastics (E2), Resource efficiency & circular economy (E5)
- Social (S): Working conditions of our own workforce (S1), working conditions in our value chain (S2). Diversity, equal opportunities, and respect for human rights (S1)
- Governance (G): Anti-corruption & bribery prevention (G1), Protection of whistleblowers (G1), Strong corporate culture & ethical business practices (G1)

Human rights & fair working conditions

Respect for human rights is fundamental to our operations. We are committed to upholding and promoting human rights across our operations and value chain and to preventing, mitigating, and addressing adverse impacts on people. Our human rights commitments explicitly include ethical recruitment, the protection of minorities and indigenous peoples, respect for land, forest, and water rights, and the responsible conduct of security forces.

- No child or forced labour: We do not tolerate child labour, forced labour, bonded labour, or human trafficking. Employment at Lagermax is always voluntary, based on fair contracts and legal requirements. No person below the legal minimum employment age will be employed. Young workers (under 18) will not be exposed to hazardous work or night shifts.
- Freedom of association/ collective bargaining: We respect the right of employees to organise, form or join trade unions, and engage in collective bargaining, as permitted by law.
- Fair working conditions: We ensure fair wages, social benefits, and reasonable working hours in line with legal and industry standards. Wages meet or exceed legal minimum standards and are sufficient to cover basic living needs. Social benefits are provided in line with national regulations. All employees receive clear wage statements detailing their compensation and benefits. Working hours comply with legal requirements, collective agreements, and industry standards. Overtime is voluntary, compensated in line with the law, and workers are guaranteed adequate rest periods and paid leave.
- Equal treatment, diversity & inclusion: We value and promote diversity as a key strength of our organisation. We reject any form of discrimination – whether based on origin, gender, age, religion, disability, sexual identity, or social background. Equal opportunities and fair treatment are fundamental to our hiring, collaboration, promotion, and compensation practices. All managers are expected to actively foster an inclusive environment and support the professional development of all employees.

- Parent rights & maternity protection: We protect pregnant and breastfeeding employees by adapting work conditions as required and by respecting parental leave rights. We also recognise the importance of supporting fathers through access to paternity leave.
- Career development & training: We actively support the continuous development of our employees. Every individual shall have the opportunity to enhance their professional and personal skills through training, workshops, and practical learning programs. We ensure equal access to development opportunities – regardless of position, location, or career stage – and encourage lifelong learning as a key element of personal growth and corporate success.
- Rights of minorities & indigenous peoples: We respect the cultural, social, and land rights of minorities and indigenous communities, especially in our supply chain.
- Ethical recruitment: We are committed to fair and ethical recruitment practices. Exploitative or deceptive recruitment methods are strictly prohibited. No employee, contractor, or applicant may be required to pay recruitment fees or deposits to obtain or keep employment. This principle also applies to all third-party recruiters and employment agencies acting on our behalf.
- Security forces & human rights: Security personnel working on behalf of Lagermax must respect human rights and apply force only when legally permitted and proportionate.
- We conduct human rights due diligence processes consistent with the UN Guiding Principles on Business and Human Rights to identify, prevent, mitigate, and account for actual and potential human rights impacts.

Measures we take

- Training & awareness: Mandatory and role-specific training for employees and managers on human rights, equal treatment, diversity, and ethical conduct.
- Inclusive work models: Family-friendly and flexible work arrangements to foster inclusion and work-life balance.
- Responsible business partners: All partners are contractually bound to comply with our standards via the Lagermax Supplier Code of Conduct.
- Human rights in contracts: Freight and supplier agreements include explicit human rights criteria, with contractual obligations for compliance and cascading of standards to sub-suppliers.

Monitoring & continuous improvement

- Supplier assessments & audits: Regular evaluation of suppliers and freight partners against social and human rights criteria.
- Whistleblowing system: Accessible to employees, partners, and customers; confidential, secure, and anonymous upon request.

- Incident tracking: All reports of violations are systematically recorded and reviewed. All substantiated violations lead to immediate remediation and, if required, termination of business relationships.
- Annual review: Human rights practices and supplier compliance are reviewed annually to ensure continuous improvement.

Health, safety & well-being

The safety, health, and well-being of our employees, contractors, and visitors are a top priority for the Lagermax Group. Safe work is not just a legal requirement – it is a shared responsibility and a key element of our corporate culture.

Safe work as a matter of principle: All employees are responsible for their own safety and that of their colleagues. Hazards must be actively prevented, and machinery, tools, and transport equipment may only be used according to safety instructions.

Responsibility & active participation: Occupational health and safety are part of our daily culture. Everyone is expected to follow applicable safety rules strictly, use personal protective equipment (PPE) correctly, and actively contribute to preventing risks.

Emergency behaviour: In case of an emergency, employees are obliged to act responsibly, assist others, and report hazards immediately. Emergency and evacuation procedures are defined in site-specific incident plans.

Promoting health & well-being: We are committed to fostering the physical and mental well-being of our employees by providing safe, healthy, and supportive working conditions that help maintain balance and prevent stress.

Management is responsible for providing safe and healthy working conditions, reviewing health and safety performance on a regular basis, and driving the continuous improvement of our occupational health and safety management system.

Measures we take

- Safe working environment: We provide safe, ergonomic, and health-promoting workplaces in all operational areas, supported by structured ergonomic guidelines for office and warehouse work.
- Training & awareness: All employees receive mandatory safety training and instructions relevant to their role, including accident prevention, risk assessments, and the safe handling of machinery, hazardous substances, and transport equipment.
- Personal protective equipment (PPE): Appropriate PPE is provided, and its correct use is mandatory.

- Employee responsibility & reporting: Every employee must follow safety rules, use PPE correctly, and immediately report hazards, incidents, near-misses, or safety deficiencies.
- Emergency preparedness: Incident and evacuation plans, first aid, and firefighting equipment are in place at all sites.
- Specialist support & safety inspections: Qualified safety specialists provide guidance, and regular safety inspections are conducted to improve workplace safety continuously.

Employees are actively involved in occupational health and safety. Hazards, near-misses, and improvement suggestions can be raised without fear of negative consequences and are considered in the continuous improvement process.

Monitoring & continuous improvement

- Incident reporting & analysis: All workplace incidents and near-misses are documented, investigated, and corrective measures are implemented.
- Regular safety inspections: Carried out by qualified safety specialists to ensure compliance and identify potential risks.
- Continuous improvement: Lessons learned from incidents and audits are integrated into updated safety protocols and training.

Environmental & climate responsibility

As a globally operating logistics group, we recognise our responsibility to protect the environment, conserve natural resources, and actively contribute to combating climate change. Sustainability is a core part of how we do business – for the benefit of our customers, communities, and future generations.

We are committed to minimising the environmental impacts of our operations, complying with all environmental laws and promoting sustainable practices across our entire value chain.

- Climate protection & net zero: Lagermax is committed to achieving Net Zero greenhouse gas emissions by 2050 in line with the Science Based Targets initiative (SBTi) by reducing greenhouse gases through fleet modernisation, alternative fuels, fleet electrification projects and energy-efficient logistics. We promote route optimisation, intermodal transport solutions, and eco-driving training to avoid unnecessary emissions.
- Energy efficiency & renewable energy: We continuously increase energy efficiency in logistics, warehousing, and administration. We invest in renewable energy through on-site solar systems, green electricity sourcing, and smart

energy management. Our goal is to achieve at least 80% renewable electricity consumption by 2025 at our sites.

- Air quality & pollution reduction: We reduce NOx, particulate matter, and other pollutants through modern fleets and eco-driving.
- Noise emissions: We aim to minimise noise emissions from fleet operations and site activities through the use of quieter, modern vehicle technologies. Sound reduction measures at logistics hubs where possible.
- Chemical management: All chemicals and hazardous materials are managed under strict control: Clear labelling, proper storage, and employee training are mandatory. Substitution of dangerous substances with safer alternatives is prioritised where possible.
- Waste management & circular economy: We are committed to responsible resource use and promote circular economy principles across our operations and supply chains. Sustainability is integrated into procurement through the use of recyclable and resource-efficient materials, as well as collaboration with suppliers who share our commitment to sustainable practices.
- Biodiversity & land use: We respect and protect local ecosystems, avoiding negative impacts on biodiversity. Environmental considerations are integrated into site planning and operational decisions.
- Deforestation: We strictly avoid any deforestation-related impacts within our operations and supply chain and do not source from suppliers involved in illegal logging or deforestation activities.
- Animal welfare: While our operations are not animal-based, we require all partners and suppliers to comply with animal welfare regulations where relevant.

Monitoring & continuous improvement

- Environmental KPIs: We systematically monitor CO₂ emissions, energy consumption, and waste volumes.
- Audits & certifications: ISO 14001 certifications at many of our locations ensure structured environmental management.
- Annual Sustainability Report: Progress, key performance indicators, and improvement measures are regularly disclosed in our annual Sustainability Report.

Ethical business conduct

Integrity, fairness, and transparency are essential to maintaining trust with our employees, partners, and society. We are committed to conducting all business activities in accordance with applicable laws, ethical principles, and the highest standards of professional conduct.

We also recognise the importance of protecting digital information and ensuring that our use of technology is responsible and secure.

- **Anti-corruption & bribery:** We have zero tolerance for bribery, corruption, or any form of undue influence. All business decisions and financial transactions must be conducted with honesty, fairness, and transparency, based solely on objective business criteria and in full compliance with applicable laws.
- **Gifts & hospitality:** Gifts, hospitality, or other benefits are only permitted if they fall within standard commercial practices, are of low value, legally compliant, and free of any appearance of influence or bribery. Occasional gifts from business partners may be accepted if they do not exceed €50, and invitations (e.g., meals, events) may be accepted if they do not exceed €100. All such actions or gifts must be appropriate, transparent, and never intended to influence business decisions.
- **Fair competition & antitrust:** We comply with all competition and antitrust laws. Price-fixing, market sharing, bid-rigging, or other anti-competitive practices are strictly prohibited.
- **Export controls and product authenticity:** We comply with applicable export control and sanctions regulations and expect our business partners to do the same. We also take reasonable measures to help prevent the handling of counterfeit or falsified goods within our logistics and supply chain processes.
- **Anti-money laundering & financial transparency:** We maintain accurate and transparent financial records and do not engage in or support illegal financial flows.
- **Conflict of interest:** Personal interests must never influence professional decisions. Any actual or potential conflicts of interest must be disclosed to the responsible manager or compliance function.
- **Information security & data privacy:** Confidential business information and personal data must be handled securely and in compliance with data protection regulations. Secure IT practices (e.g., encrypted communication, secure passwords, regular updates) are mandatory. Employees must remain vigilant against phishing, malware, and other cyber risks.
- **We protect the confidentiality, integrity, and availability of information and IT systems to ensure secure and uninterrupted operations for our customers and partners.**

Management is responsible for ensuring that appropriate technical and organisational security controls are implemented and maintained in accordance with recognised information security standards.
- **Intellectual property protection:** We respect and protect intellectual property rights – both our own and those of business partners, customers, and third parties.
- **Responsible use of company assets:** Company property – including vehicles, IT systems, and materials – must be used responsibly and only for legitimate business purposes.

Monitoring & continuous improvement

- Training & awareness: Regular training on anti-corruption, competition law, and information security is mandatory for relevant roles.
- Internal controls & information security: We maintain adequate internal controls and regularly review compliance with ethical, operational, and information security standards. Our systems and processes are continuously improved to ensure data protection and safeguard against digital risks.
- Incident handling: Reported violations are investigated promptly, and corrective or disciplinary actions are taken as required.
- We systematically evaluate incidents, non-conformities, and process risks and use lessons learned to continuously improve our management systems

Sustainable supply chain

Sustainability does not stop at our own operations – it extends across our entire value chain. We work with partners who share our commitment to environmental protection, human rights, and ethical business practices. Suppliers are expected to uphold and cascade these standards within their own supply chains and to engage in continuous improvement through constructive collaboration.

- Sustainable supply chain standards: All business partners, suppliers, and contractors must comply with the Lagermax Supplier Code of Conduct or equivalent sustainability standards. This includes respecting human rights, fair working conditions, environmental protection, and ethical conduct.
- Handling of third-party information: We treat all information received from business partners with the utmost care and confidentiality. Any data collected from suppliers or other third parties is used solely for legitimate business purposes, such as sustainability assessments, compliance with legal obligations, or due diligence processes. We ensure that such information is handled responsibly, protected against unauthorised access, and processed in accordance with applicable data protection and confidentiality requirements.

Implementation, monitoring & continuous improvement

The Executive Board of the Lagermax Group holds overall responsibility for implementing this Code of Conduct.

- The ESG team coordinates updates, ensures alignment with ESG requirements, and supports continuous improvement.
- Managers are responsible for promoting ethical behaviour and acting as role models.

- The Code of Conduct is regularly reinforced through training programs. All employees must know, understand, and comply with the principles outlined in this Code.
- The Code is communicated to suppliers and business partners, who must adhere to equivalent standards.

Monitoring & reporting

Compliance with this Code is monitored through internal controls, risk-based assessments, and performance tracking. Progress and key indicators are reported regularly through internal and external reports, ensuring transparency and accountability across all areas of our business.

Corrective actions & consequences

Violations of this Code will be investigated promptly. Serious breaches may result in disciplinary action, contract termination, or legal consequences.

Review & continuous improvement

This Code of Conduct is reviewed at least every two years or earlier if significant legal, organisational, or strategic changes occur. Lessons learned from audits, incident reports, and stakeholder feedback are integrated into updates to ensure continuous improvement.

Whistleblowing & complaints handling

Anyone who suspects a violation of this Code, legal regulations, or internal policies is encouraged to speak up.

Reports can be submitted confidentially and anonymously via:

 www.lagermax.com/whistleblowing

 compliance@lagermax.com

We strictly prohibit any retaliation against individuals who report concerns in good faith. All reports are investigated, and appropriate corrective measures are taken where necessary.

Living our values

Compliance is more than a rule – it is part of who we are. Acting responsibly builds trust with employees, customers, and partners.

"Integrity is shown in actions - not just words. Together, we keep the world in motion - responsibly."

This Code of Conduct shall be read in conjunction with the Environmental and Climate Policy and the Supplier Code of Conduct, ensuring a consistent governance framework across all ESG dimensions.

History

Date	Name	Adjustment	Signature

Questions regarding the environmental and climate policy can be addressed to compliance@lagermax.com.

Lagermax Lagerhaus und Speditionen AG,
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 5020 Salzburg, Austria
www.lagermax.com

Appendix: Glossary of Terms and Abbreviations

Term / Abbreviation	Explanation
AML (Anti-Money Laundering)	Measures to prevent, detect, and report money laundering and terrorist financing; accurate books and records required.
Anti-corruption & Bribery	Zero tolerance for offering/accepting anything of value to improperly influence decisions.
CoC (Code of Conduct)	The binding framework outlining expected ethical, social, environmental, and compliance standards for all employees, managers, and business partners of the Lagermax Group.
CO₂ / Greenhouse Gases (GHG)	Emissions contributing to climate change, including carbon dioxide (CO ₂), methane (CH ₄), and nitrous oxide (N ₂ O), measured and reported under the GHG Protocol.
Conflict of Interest	A personal interest that could improperly influence professional judgment; must be disclosed and managed.
Double Materiality / IROs	Assessment concept under the ESRS that evaluates both how sustainability topics impact the company (financial materiality) and how the company impacts people and the environment (impact materiality).
Due Diligence / HRDD	Ongoing process to identify, prevent, mitigate and account for human-rights impacts in operations and supply chains.
ESG	Framework integrating environmental, social, and governance criteria into business strategy, operations, and reporting.

ESRS	EU-wide standards defining how companies must report on environmental, social, and governance (ESG) matters.
Fair Competition / Antitrust	Compliance with competition laws; no price-fixing, bid-rigging, market/customer sharing or exchange of sensitive information with competitors.
GHG Protocol / Scope 1-3	Internationally recognised framework for measuring and managing greenhouse gas emissions: Scope 1 – direct emissions; Scope 2 – indirect emissions from purchased energy; Scope 3 – all other indirect emissions across the value chain.
Health & Safety / PPE	Occupational safety obligations incl. use of Personal Protective Equipment (e.g., helmets, gloves, eyewear).
ILO Core Labour Standards	Fundamental labour rights: prohibition of child and forced labour, non-discrimination, and freedom of association/collective bargaining.
Incident / Near-miss	Safety or compliance event (or narrowly avoided event) that must be reported, investigated, and used for improvement.
Intellectual Property (IP)	Legal rights protecting creations and know-how; respect for Lagermax and third-party IP.
ISO 14001	International standard for environmental management systems (EMS), providing a framework for continuous improvement in environmental performance.
KPIs	Key Performance Indicators used to track progress (e.g., safety, ethics training, emissions, audit results).
Non-discrimination / DEI	Equal treatment and opportunities regardless of origin, gender, age, religion, disability, sexual identity, or social background; fostering Diversity, Equity & Inclusion.

OECD Guidelines for Multinational Enterprises	Government-endorsed recommendations for responsible business conduct.
Retaliation (Non-retaliation)	Any adverse action against a person who reports in good faith; strictly prohibited by Lagermax.
SBTi / Net Zero 2050	Science Based Targets initiative guiding emissions-reduction targets aligned with climate science; Net Zero by 2050 = reduce emissions to near zero and neutralise residuals.
SCoC (Supplier Code of Conduct)	The Lagermax Group's code defining ethical, social, and environmental requirements for suppliers and contractors, including cascading to sub-suppliers.
Security Forces & Human Rights	Requirement that any security providers act lawfully, proportionately, and with respect for human rights.
UN Global Compact (UNGC)	UN initiative promoting responsible corporate governance in human rights, labour, environment, and anti-corruption.
UN Guiding Principles (UNGPs)	UN framework on Business and Human Rights for preventing and addressing human rights impacts linked to business activity.
Whistleblowing	Secure channel to report suspected violations confidentially or anonymously without fear of retaliation.