



Lagermax

GROUP

Code of Conduct



for suppliers.

Together in motion.

Supplier Code of Conduct

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Lagermax Lagerhaus und Speditions AG

"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.

The Lagermax Group is committed to responsible and sustainable business practices across the entire value chain. This Supplier Code of Conduct (SCoC) defines the minimum standards that all suppliers and business partners shall meet regarding human rights, working conditions, health & safety, environmental protection, and ethical business conduct.

Management endorsement and scope

This Supplier Code of Conduct (SCoC) has been endorsed by the Executive Board of the Lagermax Group and underscores our commitment to integrity, sustainability, and fair business practices.

It applies to all suppliers, contractors, and business partners of the Lagermax Group worldwide. Compliance with this Code is a fundamental prerequisite for establishing and maintaining any business relationship with Lagermax. Suppliers are expected to ensure that these standards are communicated and implemented throughout their own supply chains, including their sub-suppliers and subcontractors.

International standards & commitments

This Supplier Code of Conduct (SCoC) is based on the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises, and is aligned with the principles of the UN Global Compact (UNGC), the ILO Core Labour Standards, and climate-related commitments under the Science Based Targets initiative (SBTi).

Lagermax is committed to preventing, mitigating, and addressing potential adverse impacts on people and the environment across its value chain. Focus areas reflect the result of the ESRS-compliant double materiality assessment.

Human rights & fair working conditions

Respect for human rights is fundamental to our operations. Suppliers must respect internationally recognised human rights and ensure fair and safe working conditions throughout their operations and supply chains. This includes but is not limited to:

- No child or forced labour: Suppliers shall not employ, use, or otherwise engage child labour, forced labour, bonded labour, or any form of human trafficking. No person below the legal minimum employment age may be employed. Young workers (under the age of 18) must not perform hazardous work or night shifts.
- Freedom of association & collective bargaining: Suppliers shall respect the right of workers to freely associate, form or join trade unions, and engage in collective bargaining. Where these rights are restricted by law, suppliers shall allow lawful and independent alternative forms of worker representation.
- Fair working conditions:
 - Wages must at least meet legal minimum standards and be sufficient to cover basic living needs.
 - Social benefits must be provided as required by law.
 - Working hours must comply with legal and industry standards; overtime must be voluntary, legally compensated, and workers must receive adequate rest periods and paid leave.
- Equal treatment & anti-discrimination: Discrimination or harassment based on gender, race, ethnicity, nationality or citizenship, colour, origin, age, religion or belief, disability, sexual orientation, sexual identity, marital or family status, pregnancy, health status, trade union membership, political opinion, or any other status protected by applicable law is strictly prohibited in recruitment, promotion, or any other employment practice throughout the entire employment lifecycle.
- Diversity & inclusion: Suppliers are encouraged to promote equal opportunities and diversity in their workforce.
- Parents' rights & maternity protection: Suppliers shall ensure that employees who are pregnant, breastfeeding, or caring for children or dependents are provided with safe and appropriate working conditions and that their rights to parental leave are fully respected. Employees must not face any discrimination in pay, promotion, or other employment-related decisions due to family responsibilities.
- Rights of minorities & indigenous Peoples: Suppliers shall respect the rights of indigenous peoples and minority communities, including their cultural, land, and social rights. If applicable, suppliers shall engage affected communities in a transparent and consultative manner, and ensure free, prior, and informed consent (FPIC) for projects affecting land or resources.
- Land, forest and water rights: Suppliers must respect land, forest, and water rights and shall avoid contributing to any unlawful, unethical, or unsustainable use of natural resources. Where applicable to their activities, suppliers shall ensure that any land acquisition, operational land use, or new site development complies

with respective laws and respects legitimate land tenure rights and local communities.

- Ethical recruitment: Suppliers shall ensure that no worker is charged recruitment fees or required to make deposits to secure employment. All employment must be based on voluntary agreements and documented contracts.
- Use of security forces: If security personnel are employed, they must be trained to respect human rights and shall use force only when strictly necessary, legally permitted, and proportionate.
- Suppliers are expected to establish human rights due diligence processes consistent with the UN Guiding Principles on Business and Human Rights to identify, prevent, mitigate, and address potential adverse impacts.

Health, safety & well-being

Suppliers must provide a safe and healthy working environment for all employees, contractors, and visitors. Protecting health and safety is not only a legal obligation but a shared responsibility across the supply chain.

- Safe working conditions: Suppliers must ensure a safe and healthy work environment by identifying and preventing workplace hazards. Machinery, tools, and transport equipment must be adequately maintained and used only according to safety instructions. Adequate measures must be taken to protect workers from extreme weather conditions, such as heat in summer and cold in winter, including appropriate schedules, protective gear, and access to rest areas.
- Personal Protective Equipment (PPE) & safety training: Suppliers and their subcontractors must ensure that all employees receive the safety training required by EU and national regulations. Training must begin at the start of employment and be refreshed regularly. Appropriate (PPE) must be provided free of charge, and employees must be trained in its correct use. Ongoing instruction on accident prevention, risk assessment, and the safe handling of machinery, hazardous materials, and transport equipment is mandatory.
- Emergency preparedness: Suppliers must establish and maintain emergency and evacuation plans, provide adequate first aid and firefighting equipment, and ensure workers know how to act in emergencies.
- Hazardous substances & waste: Hazardous substances must be stored, handled, and disposed of safely in compliance with legal requirements and relevant international standards (e.g., REACH). Workers handling hazardous substances shall be trained and provided with appropriate protective equipment.
- Work accident reporting: Workplace accidents and safety incidents shall be documented and reviewed in line with legal requirements, and preventive measures should be implemented where feasible.

- Well-being and stress prevention: Suppliers are encouraged to promote employee well-being by creating a supportive work environment and implementing measures to prevent stress, fatigue, and burnout. Awareness, open communication, and access to appropriate support resources should be part of a workplace culture.
- Ergonomics: Suppliers should design workplaces ergonomically to reduce physical strain and prevent work-related injuries or illnesses. Regular assessments and continuous improvements of workplace design are recommended.

Environmental & climate responsibility

Suppliers must operate in an environmentally responsible manner, comply with all applicable environmental laws, and actively work to reduce their ecological footprint. Sustainability and climate protection are key expectations for all suppliers in the Lagermax value chain.

Suppliers are encouraged to disclose relevant environmental and climate data (e.g., GHG emissions, energy sources, reduction measures) upon request to demonstrate progress towards Net Zero objectives.

- 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). We expect our suppliers to support this pathway by implementing decarbonization measures appropriate to their operations, such as:
 - Reducing Scope 1–3 emissions through energy-efficient processes, alternative fuels, fleet modernisation, and route optimisation.
 - Expanding the use of low- or zero-emission vehicles and intermodal transport solutions.
 - Demonstrating measurable progress toward reducing emissions in line with a Net Zero 2050 pathway.
- Air quality & pollution reduction: Suppliers must minimise emissions of NO_x, particulate matter, and other air pollutants, for example, through modern, low-emission vehicle technologies and eco-driving practices.
- Noise emissions: Suppliers should minimise noise emissions from fleet operations and logistics sites, for example, by using quieter vehicle technologies and implementing noise-reducing measures where possible.
- Energy efficiency & renewable energy: Suppliers are encouraged to increase energy efficiency and to use certified renewable energy wherever possible. Lagermax expects suppliers to align with best practices and demonstrate progress in energy transition.
- Waste management & circular economy: Suppliers must apply the waste hierarchy – avoid, reduce, reuse, recycle – and handle hazardous waste in strict compliance with legal and environmental requirements.

- Chemical management: All chemicals and hazardous materials must be appropriately labelled, stored, and disposed of. Substitution with safer alternatives should be prioritised where feasible.
- Water and soil protection: Suppliers must protect water resources and soil quality, preventing contamination through safe storage, handling, and disposal practices. Preventive measures and proper wastewater management shall be applied at all sites.
- Biodiversity & land use: Suppliers must protect local ecosystems and avoid negative impacts on biodiversity. Environmental aspects should be considered in operational and site-related decisions.
- Animal welfare: All relevant animal welfare regulations must be respected.
- Deforestation: Suppliers shall avoid contributing to deforestation and ensure that their operations and sourcing practices comply with applicable environmental laws.

Ethical Business Conduct

Suppliers must conduct their business with integrity, fairness, and transparency and comply with all applicable laws and ethical business standards. Trust-based relationships require the highest level of professional conduct and responsible use of technology.

- Anti-corruption & bribery: Suppliers shall not engage in any form of bribery, facilitation payments, or corrupt practices. All business decisions must be based solely on objective, legitimate criteria and never influenced by personal gain.
- Gifts & hospitality: Gifts, hospitality, or other benefits must only be offered or accepted if they are modest, legally compliant, and not intended to influence business decisions.
- Fair competition & antitrust: Suppliers must comply with all applicable competition and antitrust laws. Price-fixing, bid-rigging, market sharing, or any other anti-competitive practices are strictly prohibited.
- Anti-money laundering & financial transparency: Accurate and transparent financial records must be maintained. Suppliers must not engage in or support illegal financial flows or tax evasion practices.
- Disclosure of information: Suppliers must ensure that all information and statements provided to Lagermax, customers, or public authorities are accurate, complete, and not misleading. Data must be disclosed honestly and in a timely manner. Concealment, manipulation, or falsification of information is prohibited.
- Conflict of interest: Suppliers shall ensure that personal, financial, or other interests do not improperly influence business decisions. Any actual or potential conflict of interest that could affect the business relationship with Lagermax must be disclosed promptly.

- Information security & data privacy: Confidential information and personal data related to Lagermax, its employees, and business partners must be protected. Suppliers must implement secure IT practices, including encrypted communication, secure passwords, regular updates, and vigilance against cyber threats (e.g., phishing, malware).
- Intellectual property protection: Suppliers must respect and protect the intellectual property rights of Lagermax, its business partners, and third parties.
- Export controls and product authenticity: Suppliers must comply with all applicable export control and sanctions laws and take reasonable measures to avoid the distribution or handling of counterfeit or falsified goods within their operations and supply chains.
- Responsible use of assets: Any Lagermax property, including vehicles, IT systems, or materials provided to suppliers, must be used responsibly and only for legitimate business purposes.

Suppliers with access to Lagermax data or IT systems must implement appropriate information security controls, protect shared information from unauthorised access or misuse, and immediately report any data breach or security incident affecting Lagermax.

Implementation, monitoring & continuous improvement

Suppliers are responsible for implementing the principles of this Supplier Code of Conduct within their own operations and ensuring that equivalent standards are applied throughout their supply chains.

- Supplier responsibility: Suppliers must establish appropriate management processes and controls to ensure compliance with this SCoC.
- Cascading of standards: Suppliers must communicate these requirements to their sub-suppliers and contractors and make sure their partners adhere to them. Suppliers shall maintain documentation demonstrating that their sub-suppliers and contractors comply with equivalent standards and provide such evidence upon request.
- Suppliers shall ensure service quality, process reliability, and on-time performance in line with contractual agreements and applicable industry standards
- Training & awareness: Suppliers must train their employees and relevant business partners on the requirements of this Code.
- Suppliers shall grant Lagermax or its appointed auditors reasonable access to relevant sites, documentation, and personnel to verify compliance with this Supplier Code of Conduct.

Monitoring & continuous improvement

- Supplier assessments: Lagermax integrates sustainability and compliance criteria into its supplier evaluation process. To verify adherence to this SCoC, Lagermax reserves the right to conduct audits – for example, through on-site visits or questionnaires. Suppliers must provide relevant information upon request to demonstrate compliance.
- Progress & key performance indicators: Suppliers are expected to monitor and improve their environmental, social, and governance performance, particularly in areas such as CO₂ reduction, health & safety, and human rights.
- Continuous improvement: Suppliers are expected to set goals and take steps to improve their practices in line with Lagermax's Net Zero 2050 ambitions and other sustainability commitments.

Corrective actions & consequences

Violations of this Supplier Code of Conduct may lead to requests for corrective action plans with clear timelines. In cases of severe or repeated non-compliance, business relationships may be suspended or terminated. Where required by law, such violations may also be reported to the relevant authorities.

Suppliers with access to Lagermax data or IT systems must implement appropriate information security controls, protect shared information from unauthorised access or misuse, and immediately report any data breach or security incident affecting Lagermax.

Whistleblowing & no retaliation

Suppliers must establish channels for employees to report concerns confidentially. Any suspected violation of this SCoC or applicable law can also be reported directly to Lagermax:

[🔗 www.lagermax.com/whistleblowing](https://www.lagermax.com/whistleblowing)

[✉️ compliance@lagermax.com](mailto:compliance@lagermax.com)

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

Review & updates

This Supplier Code of Conduct is reviewed at least every two years or earlier if significant legal, organisational, or strategic changes occur. Updated versions will be communicated to suppliers.

Supplier acknowledgement

By signing below, the supplier confirms that it has read, understood, and will comply with the Lagermax Supplier Code of Conduct and will cascade these requirements to its own supply chain.

Supplier Name: _____

Authorized Representative: _____

Position: _____

Signature: _____

Date: _____

Appendix: Glossary of Terms and Abbreviations

Term / Abbreviation	Explanation
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.
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.
ILO Core Labour Standards	Fundamental labour rights: prohibition of child and forced labour, non-discrimination, and freedom of association/collective bargaining.
OECD Guidelines for Multinational Enterprises	Government-endorsed recommendations for responsible business conduct.
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.
ESRS	EU-wide standards defining how companies must report on environmental, social, and governance (ESG) matters.
Health & Safety / PPE	Occupational safety obligations incl. use of Personal Protective Equipment (e.g., helmets, gloves, eyewear).
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.
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.
Whistleblowing	Secure channel to report suspected violations confidentially or anonymously without fear of retaliation.