

# Supplier Code of Conduct

As a global leader in international forwarding, Kuehne+Nagel operates with a large network of third parties that contribute to successfully delivering services to customers.



Kuehne+Nagel is committed to the principles set out in this Supplier Code of Conduct, and expects third parties with whom we engage, including suppliers, their employees, personnel, agents, and further sub-contractors along the supply chain (collectively referred to as “Suppliers”) to consistently act in compliance with these principles as well as with applicable laws and regulations, whichever is most stringent (collectively referred to as “Requirements”).

The Supplier Code of Conduct outlines Kuehne+Nagel’s minimum expectations from Suppliers and is based upon principles of internationally recognized laws, regulations, and standards including but not limited to: United Nations Global Compact (UNGC), Organization for Economic Cooperation and Development (OECD), United States Foreign Corrupt Practices Act of 1977 (FCPA), United Kingdom Bribery Act, International Labor Organization (ILO), European Union Corporate Sustainability Reporting Directive (CSRD), World Customs Organization (WCO) SAFE Framework of Standards, and United States Food and Drug Administration (FDA).



## Ethical Standards

Suppliers shall conduct their business in an ethical manner and act with integrity. This shall include but is not limited to:

- Facilitation payments: Facilitation payments made to governmental officials are prohibited unless for legally granted exceptions.
- Conflicts of interest: Suppliers shall disclose to Kuehne+Nagel in writing any actual, potential, or perceived conflicts of interest that may adversely influence the business relationship.
- Gifts and entertainment: Suppliers shall neither offer nor receive anything of value to obtain or retain improper benefits or advantages. Gifts and entertainment shall always be modest, reasonable, infrequent, in the normal course of business and permitted by applicable laws and regulations and relevant customer standards.
- Political contributions: Suppliers shall not make political contributions on behalf of Kuehne+Nagel.
- Insider trading: Using or sharing non-public information with others for insider trading purposes is prohibited.
- Responsible communication: Suppliers shall not make statements to the media or issue press releases, or any publicity including use of Kuehne+Nagel's brand, logo, or trademark materials without prior written consent.



## Labor and Human Rights

Suppliers shall be committed to upholding internationally proclaimed human rights of workers. It is forbidden to employ children under the minimum legal working age. Suppliers shall not engage in or support the use of any form of forced compulsory or illegal labor. As a minimum, statutory wages must be paid, and applicable working time legislation must be followed. Suppliers shall

enable their employees to freely form and join, or not to join, trade unions and to bargain collectively. Suppliers shall ensure that their employees are not discriminated against on grounds of their gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, or disability.



## Quality

Supplier shall maintain a quality management system according to ISO 9001 or similar and meet the requirements of [Kuehne+Nagel's Quality Statement](#).





## Health and Safety

Suppliers shall comply with mandatory global and local occupational health and safety laws, regulations, and standards such as ISO 45001 or similar, including [Kuehne+Nagel's Safety & Health Statement](#). The most stringent Requirement always prevails.

Suppliers will provide work environments that are safe and conducive to good health. This involves providing proper training, protective equipment, and ensuring that facilities meet safety standards, including handling of hazardous materials, emergency preparedness, and risk mitigation.

Such working environments will preserve the health of their employees and prevent accidents, injuries, and work-related illnesses. Identification of all work and workplace-related hazards is required. Suppliers shall inform all persons involved in the contracted work about the identified risks and shall train in risk mitigation practices which includes safety information about hazardous substances used, for example, chemicals and active pharmaceutical ingredients.

Suppliers are required to explicitly prohibit alcohol and drug use at work sites or during operations.



## Emergency Preparedness and Response

Suppliers shall identify and assess emergency situations in their workplaces and minimize adverse impacts by implementing safety controls like emergency response plans and procedures. Emergency responses include adequately trained and certified first aiders and/or first intervention teams as required by law.

Suppliers shall have effective business continuity management and plans in place to mitigate the most imminent risks. Suppliers shall train personnel regularly and shall conduct threat simulations at least once a year. Results shall be shared with Kuehne+Nagel upon request.



## Environment

Suppliers of Kuehne+Nagel shall comply with environmental laws, regulations, and standards such as the ISO 14001 or similar and meet the requirements of [Kuehne+Nagel's Environmental Policy Statement](#). All required permits, licenses and chemical registrations will be available. The aim is to continuously minimize resource consumption (i.e., energy, water, raw materials, and primary materials), environmental impact (i.e., emissions, pollutants, waste), and climate change.

In addition, Kuehne+Nagel expects its suppliers to implement effective measures to reduce direct and indirect CO2 emissions, including their upstream and/or downstream supply chain, and communicate this pledge to their value chain.

Suppliers shall continuously minimize and prevent polluting releases into the environment. Any waste, wastewater discharge, or air emissions with potential to adversely impact human or environment health will be appropriately managed, measured, controlled, and treated prior to release into the environment. The waste management will favor waste prevention, recycling or recovery of waste and use of recovered materials. When handling hazardous chemicals and waste, Suppliers will ensure that all the substances presenting an environmental risk are identified, labelled, stored, handled, and shipped in a manner that prevents and mitigates accidental spills and releases to the environment.



## Legal and Regulatory Standards

Suppliers shall ensure their business activities are always based on high ethical and legal standards. Suppliers must comply with all laws and regulations relevant to their business. Kuehne+Nagel does not tolerate unlawful behaviors or violations of applicable laws or breaches of the Requirements. This shall include but is not limited to:

- **Anti-bribery and anti-corruption:** Suppliers shall not engage in any form of bribery or corruption. This includes active and passive bribery, misuse of procurement processes, improper kickbacks, and fraudulent activities.
- **Trade laws:** Suppliers shall comply with any applicable United Nations, United States, European Union or national customs, import, export, transit, defense, trade control or sanctions laws and regulations that would prohibit the provision of goods and/or services.
- **Data privacy and information security:** Suppliers shall not, without authorization, disclose any confidential or proprietary information belonging to Kuehne+Nagel, its customers, and/or any business partners, received by Suppliers during or after collaboration with Kuehne+Nagel. Suppliers must adhere to all relevant standards and regulations regarding data protection, cyber and information security, ensuring appropriate measures are in place to safeguard data and maintain confidentiality. Suppliers shall make available all information necessary to demonstrate compliance with the Requirements.
- **Anti-money laundering:** Suppliers shall ensure that none of its activities facilitates money laundering, funding of terrorism and/or any other criminal activities.
- **Antitrust and fair dealings:** Suppliers shall not engage in anti-competitive behavior and shall lawfully mitigate circumstances that could have an improper impact on competition.
- **Tax evasion:** Suppliers shall not facilitate or engage in unlawful tax evasion by themselves or on behalf of others.
- **Accounting:** Suppliers shall maintain accurate and complete books and records of their business activities in line with relevant accounting and retention laws and standards.



## Conflict Minerals and Metals

When applicable, Suppliers shall have in place systems and processes to identify, manage, and report on risks relating to conflict minerals and metals in the supply

chain as required by applicable laws and regulations, specifically Swiss and European Union. Upon request, Suppliers shall provide Kuehne+Nagel with required information.



## Security

Suppliers shall understand that Kuehne+Nagel adheres to certain (inter alia governmentally supported) supply chain security regimes, in particular WCO Safe Framework of Standards, EU (European Union) Authorized Economic Operator (AEO), and US Customs Border Protection's

(CBP) Customs Trade Partnership Against Terrorism (C-TPAT). Therefore, Suppliers shall confirm to comply with security provisions set forth in applicable regimes and also meet Requirements of [Kuehne+Nagel's Security Statement](#).



### Sub-contracting

Suppliers are not permitted to engage any subcontractors without Kuehne+Nagel's prior written consent. Any sub-contracted services are always limited to the needs of the supply chain to which they are engaged.

Sub-contracting and brokering by means of web-platforms is prohibited.



### Monitoring and Auditing

Suppliers shall support and facilitate any form of monitoring and auditing by Kuehne+Nagel (or third parties assigned on its behalf) including but not limited to completing

environmental, social, and governance (ESG) or security performance self-assessments, as well as on-site audits and inspections.



### Confidential Reporting

Any observation of improper business conduct or unlawful activity can be reported confidentially to the [Kuehne+Nagel Confidential Reporting Line](#), which is protected by Kuehne+Nagel's commitment to non-retaliation.

## Guidance for this Supplier Code of Conduct

To ensure effective implementation and observance of this Supplier Code of Conduct along the supply chain, Suppliers are expected to establish and maintain a management system including the following:

- Incorporate the Requirements into their own policies and standards.
- Perform risk-based training for and communication to relevant individuals.
- Operate effective controls and monitoring.
- Ensure to maintain adequate books and records in line with legally required retention of documents.
- Require approved sub-contracted third parties to periodically confirm compliance with the Requirements in writing.
- Periodically complete risk-based due diligence on sub-contracted third parties.
- Reasonably support and facilitate any request for relevant information or data.
- Monitor relevant evolving laws and regulations ensuring ongoing compliance.
- Inform Kuehne+Nagel in writing of any instance of (material) non-compliance within reasonable or legally determined timeframes.
- Upon reasonable request, cooperate in case of an investigation of non-compliance.
- Effectively remediate any (material) issues of non-compliance.
- Periodically perform audit activities

Kuehne+Nagel reserves the right to terminate business relationships with Suppliers not compliant with the Requirements of this Supplier Code of Conduct.

## Declaration of the Supplier

We have received a copy of the Supplier Code of Conduct and hereby commit ourselves, in addition to our commitments set out in the supply agreements and/or purchase orders with Kuehne+Nagel, to comply with its principles and Requirements.



We agree that any breach of the principles stipulated in the Supplier Code of Conduct is considered a material breach of contract by the Supplier.



We agree that this declaration is subject to the substantive laws, legal proceedings and venue which are set out in the supply agreements and/or purchase orders concluded between Kuehne+Nagel and us.

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[www.kuehne-nagel.com](http://www.kuehne-nagel.com)

