



Global Transport and Logistics



SUPPLIER CODE OF CONDUCT

OCTOBER 2024



CONTENTS

INTRODUCTION BY THE CEO	3
ANTI-BRIBERY AND CORRUPTION	4
Bribery	4
Facilitation payments	5
Kickbacks	5
Money laundering, financing of terrorism and other criminal activities	5
Gifts and hospitalities	5
Direct political contributions	5
COMPETITION	6
USE OF INFORMATION AND DATA PRIVACY	7
Confidential material and information	7
Data privacy	7
Responsible conduct	7
HUMAN RIGHTS	8
Compliance with international human rights standards	8
Forced labour, human trafficking and modern slavery	8
Child labour	8
Working hours and remuneration	8
Discrimination and harassment	9
Safe working conditions	9
ENVIRONMENTAL IMPACT	10
EXPORT CONTROLS AND SANCTIONS	11
Denied party screening	11
Restricted countries and regions	11
Restricted goods	11
IN PRACTICE	12
Report violations	12
Follow up on reports and possible sanctions	12

INTRODUCTION BY THE CEO

The DSV Supplier Code of Conduct outlines the ethical principles that are essential to our operations, reinforcing our commitment to integrity, transparency and respect throughout our value chain. Aligned with our core values and organisational policies, this Code serves as a guide to uphold the highest ethical standards and applies to all business partners of DSV. These include, but are not limited to, suppliers, agents, representatives and joint venture partners.



As a DSV supplier, you play a pivotal role as an ambassador within our shared value chain. To this end, we expect you to embrace and adhere to the same ethical standards that define our company. This Supplier Code of Conduct outlines the expected behaviour all suppliers must embody. You must also ensure, to the greatest extent possible, that your own agents and sub-contractors also comply with the requirements of the DSV Supplier Code of Conduct.

DSV expects its suppliers to comply with relevant laws, international regulations and standards, including, but not limited to the OECD Guidelines for Multinational Enterprises. It is important that you familiarise yourself with and follow this Supplier Code of Conduct. If you have any questions or uncertainties, do not hesitate to reach out to your DSV contact person for clarification. Where local laws and regulations differ from the standards set in this Code of Conduct, the stricter standard must always be applied.

Given the diverse global landscape, it is crucial to exercise sound judgment in all business dealings on behalf of DSV. Recognising that this Code cannot address every scenario within our global organisation, it is essential that you exercise caution when conducting business on behalf of DSV, and always contact your DSV contact person for guidance in case of doubt.

Should you encounter or suspect any breaches of the Supplier Code of Conduct or applicable laws and regulations, we urge you to act promptly. Report the issue to your DSV contact person or through DSV's Whistleblower system, *Integrity Line*, to ensure transparency and uphold our collective commitment to ethical business practices.

If you face a situation and are in doubt about how to act, ask yourself the following questions:

- Is it consistent with the Code of Conduct?
- Is it lawful?
- Is it ethical?
- Will it reflect well on me and DSV?
- Would I want to read about it in the newspaper?
- Would my family and friends approve of it?

If the answer to any of these questions is "no", you should avoid doing it. If you are still uncertain, you should ask for guidance or contact DSV. Keep asking until you are certain or report the issue through the relevant channels.

A handwritten signature in black ink, appearing to read "Jens H. Lund".

Jens H. Lund
CEO, DSV Group

ANTI-BRIBERY AND CORRUPTION

DSV has a zero tolerance approach towards bribery and corruption and complies with applicable anti-bribery and corruption legislation, particularly the US Foreign Corrupt Practices Act and the UK Bribery Act and expects the same of our suppliers. DSV expects its Suppliers to conduct business in an ethical and lawful manner and to use the following specific rules to address anti-corruption. The Code does not prohibit normal and appropriate hospitality – given or received.



BRIBERY

Bribery refers to the offering, promising, accepting or soliciting of an advantage or anything of value as an incentive to influence an act that is illegal, unethical or a breach of trust. The benefit exchanged can include anything of value and is not only limited to monetary transfers (e.g. favours, gifts, loans, etc.).

DSV prohibits bribery without exception, including in instances where bribery is accepted as normal business practices.

DSV Suppliers must not accept or offer bribes of any kind.

The prohibition of bribery includes instances where it takes the following forms:

- Charitable donations
- Payment of travel expenses
- Delivery of products and/or services
- Disproportionate entertainment expenses
- Transfer of other personal or financial benefits

Example of bribes:

Offering a bribe:

Offering to pay for a hotel stay of a potential customer and partner, but only if he/she agrees to do business with you.



This would be an offence since the offer is or can be viewed as being given to gain a commercial and contractual advantage.

Receiving a bribe:

A supplier offers your nephew a job but makes it clear that in return you are expected to use your influence to ensure that your company continues to do business with the Supplier.



It would be an offence if you accepted the offer because you would be doing so to gain a personal advantage.

FACILITATION PAYMENTS

Facilitation payments – sometimes also called “grease” payments – are small payments made to public officials to secure or speeds up routine or necessary processes, which the public official is already duty-bound to perform without the need for payment. Such payments may seem harmless, partly because the sums involved are usually small and partly because they are often regarded as part of local custom or culture but are still considered bribes and therefore prohibited.

As a DSV Supplier, you are strictly prohibited from making facilitation payments or accepting such practice in any country by any party.

It makes no difference whether facilitation payments are permitted or commonly accepted according to local practice.

The only exception is if you reasonably believe that your or another person's life, health or safety may be at risk. In these instances, making the payment is not considered a violation of the Code, but must be reported to your DSV contact person.

Example of a facilitation payment:

Offering a facilitation payment:

You need a permit. The issuance of the permit usually takes two weeks. You offer the public official handling the permits a small amount of money to issue the permit in one day. By doing so, you make the person speed up the issuance process.



This is a facilitation payment.

KICKBACKS

A kickback is a payment or a form of negotiated bribery where a commission given to someone for facilitating a commercial transaction such as a contract. Kickbacks are also considered bribery, and it is therefore prohibited for DSV Suppliers to give or receive kickbacks to or from other business partners.

Kickbacks, as referred to here, must not be compared to a normal bonus programme between the Supplier and DSV.

Examples of kickbacks:

Receiving kickbacks:

You are responsible for hiring road transport subcontractors to provide DSV with transportation services. You get in contact with a new road transport subcontractor and consider hiring this company even though you have some concerns about whether the subcontractor can deliver on quality. You express your concern to the subcontractor and suddenly they offer you a percentage of all sales to be paid to you personally – the higher the sale, the higher the payment you will receive.



Such an arrangement would be considered a kickback.

MONEY LAUNDERING, FINANCING OF TERRORISM AND OTHER CRIMINAL ACTIVITIES

Money laundering is the act of concealing or disguising money obtained from criminal activities and making it appear to have originated from legitimate sources or to constitute legitimate assets.

Funding terrorism operations may involve concealing the source of funds or their intended use.

You must not engage in money laundering or any activity that facilitates money laundering, funding of terrorism and any other criminal activities.

GIFTS AND HOSPITALITIES

Entertainment, hospitality and the exchange of gifts are considered common practice and part of building and maintaining business relationships throughout the world. However, DSV suppliers should be careful that the exchanges do not constitute bribes or can be perceived by others as an unfair influence.

As a DSV supplier, you are allowed to accept and offer gifts if the value does not exceed a reasonable level and the gift, entertainment or hospitality is not intended to influence the recipient. What is considered reasonable will vary depending on the country and culture. As a rule of thumb, the value of a gift should not exceed twice the estimated hourly wage rate of the recipient.

It is not allowed to accept or offer cash equivalent gifts, such as gift cards. Paid travel expenses, hotel accommodation and restaurant visits must be directly related to the business conducted with DSV. Regardless of the value of the gift or hospitality, you should always be aware of the timing of the exchange to ensure that it cannot be perceived as a bribe or an unfair influence.

DIRECT POLITICAL CONTRIBUTIONS

When acting in the capacity of a representative of DSV, engaging in direct political contributions is strictly prohibited. Direct political contributions include monetary and in-kind endorsements for election campaigns, parties, organisations, or politicians on behalf of DSV. This prohibition does not apply to suppliers' personal choices or political beliefs, as long as these cannot be confused or misinterpreted as representing those of DSV.

COMPETITION

DSV is committed to complying with all applicable competition and anti-trust legislation at all times. To ensure compliance as a Supplier, you must be aware of situations that could have an impact on competition.

Regardless of the contract form, agreements must always be negotiated in accordance with fair competition principles.

As a Supplier, you must observe the same degree of diligence and must not conclude any contracts or agreements, formal or informal, with the purpose or likely effect of substantially limiting competition.

You must not participate in or be a party to:

- Price fixing
- Market sharing (dividing markets)
- Limitation or control of production or capacity
- Exchange of information on prices or other terms and conditions regarding DSV companies, suppliers or other related third parties
- Collusive agreements on essential terms, rates, fees, charges and conditions between competitors



USE OF INFORMATION AND DATA PRIVACY

At DSV, our business operations depend on data and information. Unauthorised disclosure or misuse could harm DSV, our customers, suppliers and other business partners. It is our duty to handle all information—including intellectual property and confidential data—with care. As a DSV supplier, you are expected to respect and protect the confidentiality of information belonging to DSV, our customers, suppliers and other business partners.



CONFIDENTIAL MATERIAL AND INFORMATION

You are not allowed to disclose any confidential or proprietary information received during or after your collaboration with DSV to unauthorised individuals or third parties.

Confidential or proprietary information may only be disclosed to a third party if authorised in writing through a non-disclosure agreement or if disclosure is required by law.

Confidential and proprietary information includes all non-public information that could be of use to competitors or be harmful to DSV, our customers, suppliers and other business partners if disclosed.

DATA PRIVACY

DSV collects data about you as a Supplier, for example your vendor details such as company information, telephone number and postal or email address.

To comply with data privacy legislation, DSV has issued binding corporate rules ensuring that collected personal data is not corrupted, copied, stolen, disclosed, misused or made accessible to persons without adequate authorisation and approval.

We expect the same standards from our Suppliers.

You can read more about our Binding Corporate Rules [here](#).

RESPONSIBLE CONDUCT

DSV encourages using social media and other online platforms for business communication and networking. However, remember that posts on personal social media accounts, such as LinkedIn, Facebook or X, are public and therefore must not include confidential DSV information.

When posting on social media, make it clear that your views are personal and not representing the company, unless you are an authorised DSV representative.

When communicating in the public domain and when such communication could be perceived as being related to DSV, the following activities are not permitted:

- Messages or postings containing statements on any subject that could be mistakenly interpreted as the standpoint of DSV.
- Publication of defamatory and/or knowingly false material about DSV, its employees and/or customers or suppliers.

This applies regardless of whether the communication occurs online or elsewhere, from a private or company-owned device, during the workday or outside office hours.

HUMAN RIGHTS

DSV strongly believes that human rights are fundamental and should be protected at all times, as established under the International Labour Organisation (ILO) Conventions and Recommendations. DSV is committed to fair employment practices and equal opportunities and treatment. All people who carry out services for DSV, whether directly as DSV employees or indirectly as employees of our Suppliers, must be treated decently and with dignity.



COMPLIANCE WITH INTERNATIONAL HUMAN RIGHTS STANDARDS

As a participant of the UN Global Compact, DSV supports and is committed to complying with applicable human rights and labour laws and regulations, and we expect the same standards from our suppliers. We are committed to adhering to the ILO Declaration on Fundamental Principles and Rights at Work, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and we are a signatory of the UN Global Compact.

Employees have the right to join a union or labour organisation and engage in collective bargaining, in accordance with applicable legislation. DSV supports a constructive dialogue between employer and employee.

FORCED LABOUR, HUMAN TRAFFICKING AND MODERN SLAVERY

DSV is committed to the fight against human trafficking, forced labour and debt servitude. This means that at DSV, all labour must be voluntary. We recognise and respect the right to unionisation collective bargaining in accordance with applicable law. We publish an annual Modern Slavery Act Statement where we disclose actions taken and future plans to ensure no form of modern-day slavery or human trafficking takes place in our supply chains or in any part of our business.

For more information, read our [Modern Slavery Statement](#).

Suppliers must be aware of the following requirements:

- DSV does not allow recruitment agencies to charge any fees or costs to prospective employees.
- DSV does not allow employees' passports or government identifications to be withheld.
- Employees must receive a letter of confirmation of their employment conditions if required by national legislation.

CHILD LABOUR

The employment of children contrary to ILO Convention C138 on minimum age for labour is prohibited. The minimum age of employees cannot be less than the age of completion of compulsory schooling and, in any case, cannot be less than 15 years old.

WORKING HOURS AND REMUNERATION

Working hours and rest periods in between work must be within the local legal limit or the ILO recommended limits, whichever is lowest.

The remuneration of employees should meet or exceed statutory or agreed national industry minimum standards and should not fall below the living wage in the country.

DISCRIMINATION AND HARASSMENT

At DSV, we are committed to a welcoming and inclusive workplace and have a zero-tolerance policy for any form of harassment. As a DSV supplier, you must uphold equal rights for all and stand against discrimination, unfair treatment, harassment or disruptions based on factors such as nationality, race, disability, gender (including identity or expression), sexual orientation, religion, politics, ethnicity or social background. Any form of abuse—physical, sexual, mental or verbal—as well as threats or intimidation, is strictly prohibited.

SAFE WORKING CONDITIONS

DSV expects its suppliers to demonstrate diligence and good judgement, including how to respond in cases where there is suspicion of inadequately skilled and trained personnel.

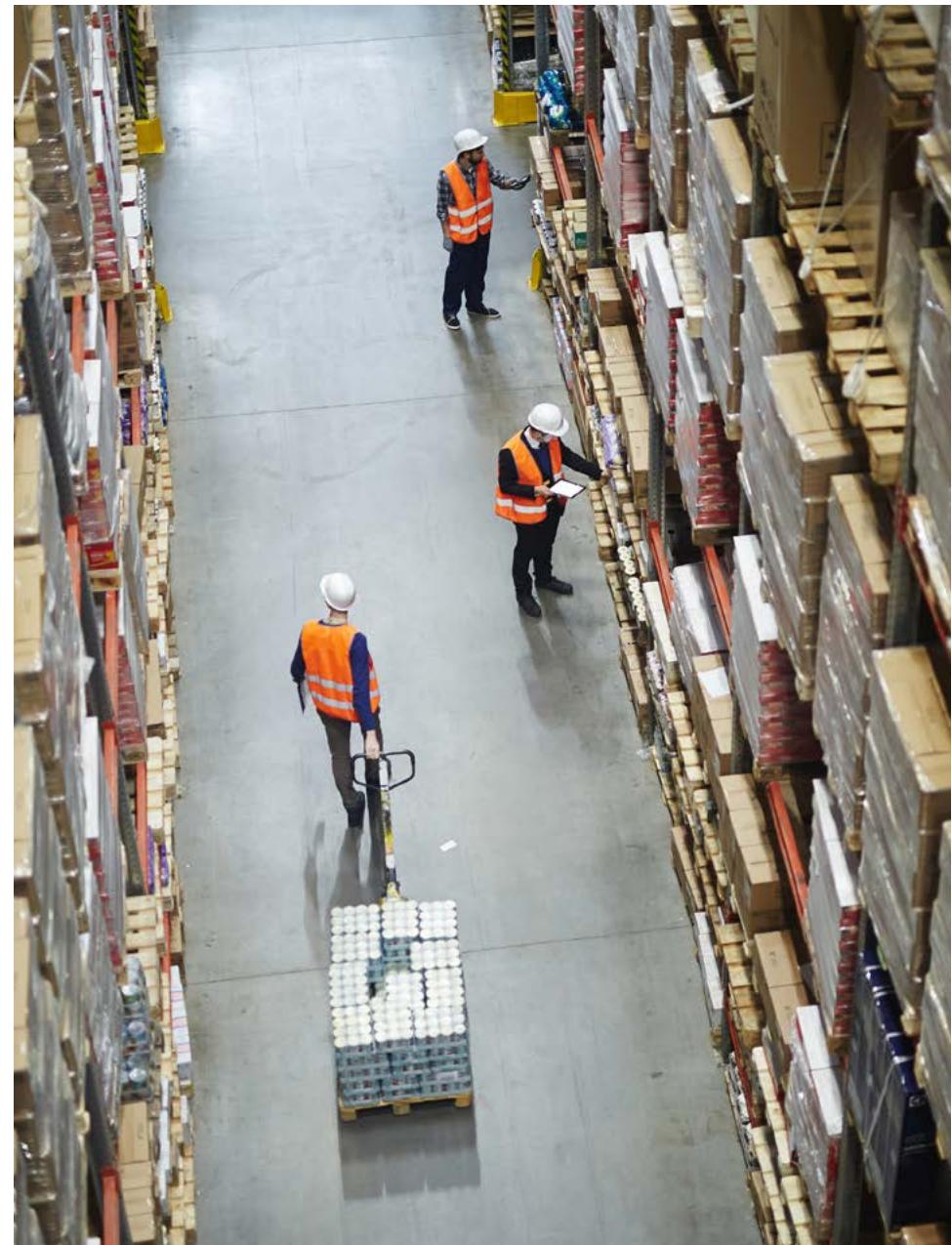
In performing its core freight forwarding and logistics activities, DSV relies almost exclusively on Suppliers when it comes to the physical transport of goods. Therefore, DSV Suppliers are expected to have procedures for health and safety in place that ensures a healthy and safe physical and psychological workplace and have taken appropriate measures to prevent the use and abuse of alcohol, drugs, or other unlawful substances by its personnel while engaged with work.

DSV expects that all Suppliers effectively communicate any health and safety issues or non-compliances to its DSV employee representative.

Any fatal accidents and/or serious injuries and those that may lead to a liability, legal action or claim involving DSV and/or its Customer(s) are to be reported verbally to your DSV employee representative immediately or as soon as becoming aware followed by a written statement at the next business day.

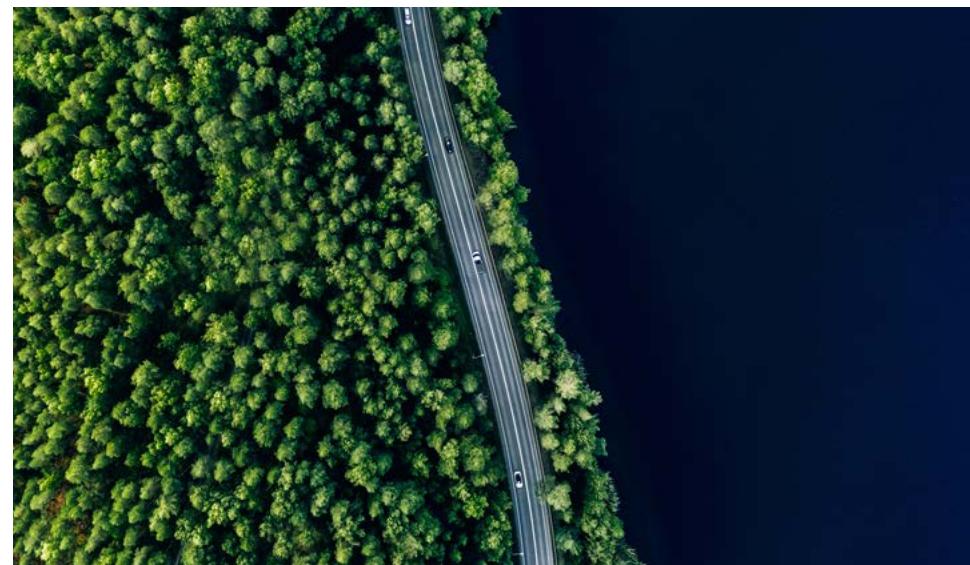
DSV expects its Suppliers to ensure that any equipment used when providing services to DSV is of good and sound quality, meets the general and legally required standards of maintenance and always satisfies any safety regulations or measures.

Suppliers must comply with specific requests, rules and regulations laid down by DSV or its customers in respect of the general behaviour, handling, stowing, loading, unloading and transport of goods from and to the customer's or DSV's locations. However, Suppliers are not obliged to comply with specific requests that may be contrary to traffic safety regulations or similar regulations in the jurisdictions in or through which the transport is to take place.



ENVIRONMENTAL IMPACT

Actors in the transport and logistics industry are some of the largest consumers of fossil fuels and significantly contribute to waste generation, as many of the materials used for storage and transport are often single-use. As a leading global freight forwarder, DSV recognizes its responsibility to address climate change and air pollution. To meet the industry's goal of net-zero emissions by 2050, we are committed to engaging our value chain, and we expect our suppliers to actively contribute to reducing their environmental impact when providing transport services on behalf of DSV.



Our commitment is based on a robust management system with clear policies, actions, and targets aimed at tackling the most significant environmental challenges, including climate change, air pollution, and waste management. Several DSV initiatives are driving progress toward these goals, focusing on investments in new technologies, alternative fuels, and renewable energy, as well as implementing efficiency measures for energy and resource use. We regularly monitor and report on our progress to ensure we stay on track to meet our targets.

As part of this shared responsibility, we expect our suppliers to:

- Comply with all applicable environmental laws and regulations, including any relevant management and reporting obligations.
- Provide evidence of environmental certifications, authorizations, or permits when required by DSV.
- Establish effective environmental management systems that ensure continuous improvements and mitigate environmental risks.
- Support DSV's decarbonization efforts and, where feasible, collaborate on joint projects related to new technologies, alternative fuels, and other ways to manage and reduce the environmental impact of transportation.

Report any concerns or raise questions regarding environmental practices to your DSV contact or through the DSV Whistleblower system, *Integrity Line*.

For more information about DSV's sustainability initiatives, please refer to our Sustainability Policy.

EXPORT CONTROLS AND SANCTIONS

All people who work for or on behalf of DSV share a responsibility to ensure compliance with applicable export controls and sanctions. If we fail to comply, this negatively impacts our collective security and poses a risk to our reputation. Non-compliance also brings a risk of serious civil and criminal penalties. Suppliers are encouraged to implement compliance programmes that support the prevention, detection and timely correction of any breaches of export controls and sanctions.

DENIED PARTY SCREENING

DSV ensures that no business is conducted with parties subject to relevant restrictions under export controls and sanctions by screening all our business partners against denied party lists published by governments and intergovernmental organisations.

RESTRICTED COUNTRIES AND REGIONS

Some countries and regions bring a higher risk under export controls and sanctions than others. DSV closely monitors all operations to ensure compliance with export controls and sanctions and applies additional due diligence and care in relation to higher-risk countries and regions.

RESTRICTED GOODS

Certain goods require government authorisation before they may be exported, imported, transferred or moved in transit. In cooperation with its business partners, DSV always ensures that all required authorisations are in place before commencing any transports.



IN PRACTICE

DSV Suppliers must comply with the Supplier Code of Conduct at all times. They must also comply with these principles when choosing business partners and when conducting their business and providing services on behalf of DSV.



The obligations under the Supplier Code of Conduct are an extension of the Suppliers' obligations under any contracts concluded between DSV and the Supplier. DSV reserves the right to conduct audits to verify that its Suppliers meet the standards of the Supplier Code of Conduct.

REPORT VIOLATIONS

DSV is committed to maintaining a culture of integrity and accountability. As a DSV supplier, you are encouraged to speak up when you know of or suspect any irregularities or improper actions that have been committed or are likely to be committed. You are also urged to report any concerns of suspected breaches of the principles and rules outlined in this Supplier Code of Conduct or applicable laws and regulations.

To this end, DSV has established the DSV Whistleblower system, *Integrity Line*, open for all employees, suppliers and external third parties to securely report any concerns or knowledge of misconduct. Any breaches of this Supplier Code of Conduct or applicable laws and regulations must be reported to your DSV contact or through the DSV Whistleblower system, *Integrity Line*.

For more information regarding our *Integrity Line*, please refer to our [Whistleblower Policy](#).

FOLLOW UP ON REPORTS AND POSSIBLE SANCTIONS

Any non-compliance with the Supplier Code of Conduct is taken very seriously, and the Supplier is expected to initiate corrective actions to remedy such breach as well as take appropriate measures to prevent any future reoccurrence.

In case of serious or repeated breaches, DSV reserves the right to terminate the business relationship without any liability to the Supplier with immediate effect.

The Supplier Code of Conduct is also available at www.dsv.com. Suppliers are required to familiarise themselves with the content of the Supplier Code of Conduct.

If you have a concern, you can reach out to DSV or report it through the DSV Whistleblower system, *Integrity Line*.

DSV Whistleblower system, *Integrity Line*
<https://dsv.whistleblownetwork.net>

Learn more about our DSV Whistleblower system, *Integrity Line* at dsv.com

<https://www.dsv.com/en/sustainability-esg/our-integrity>