

# CODE OF CONDUCT





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## WHAT WE STAND FOR

Our Code of Conduct reflects our corporate values “Respect & Results”. The rules and standards outlined here serve as an “ethical compass” that guides our employees worldwide in their day-to-day work. In all business units and regions, the conduct of managers and employees, both toward each other and toward business partners, customers and investors, is characterized by mutual respect.

Respect also means observing applicable legal regulations in all regions and countries in which we operate. For us, there is no alternative to conducting our business in a responsible, fair and ethically irreproachable way. The Code of Conduct is binding for all regions and business units of DHL Group.

We are aware of our special corporate responsibility toward the environment, society and our employees, and we demonstrate this clearly in our business practices and our daily work.

Overall, our Code of Conduct describes behaviors, beliefs and standards that we aspire to and view as the basis of our established practice. It is an indispensable part of our corporate identity, reflects our corporate values and pays into our customer promise “Excellence. Simply Delivered.”

The Board of Management endorses the values outlined in this Code of Conduct and expects all employees, executives and managers to be role models in their daily work and to contribute to a corporate culture characterized by respect.

Dr. Tobias Meyer

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## OUR CODE OF CONDUCT

As a signatory to the UN Global Compact, we are committed to its ten principles. We respect the principles of the Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. As a longstanding partner of the United Nations, we also support the UN's Sustainable Development Goals (SDGs).

## OUR RESPONSIBILITY

All employees, executives, managers and Board Members are called on to breathe life into the Code of Conduct and thus contribute to the success of our company:

- ✓ Familiarize yourself with its standards and values and stay up to date, for example by taking part in training sessions.
- ✓ Be engaged and report any violations.

Our executives, in particular, act as role models for integrity and respect. As an executive, you have a special role to play in implementing the Code of Conduct:

- ✓ Create a culture characterized by mutual respect, openness and trust.
- ✓ Do everything you can to promote the implementation of the Code of Conduct.
- ✓ Ensure that the employees under your supervision comply with the Code of Conduct and be a role model of these values in your daily work.
- ✓ Inform and advise your team about the standards and values set out in the Code of Conduct.
- ✓ Provide opportunities for others to voice concerns openly and directly.

**VALUES STANDARDS**  
**ROLE MODELS SUCCESS**  
**INTEGRITY RESULTS**  
**RESPONSIBILITY**  
**RESPECT TEAM CONDUCT**

## OUR CONDUCT

When confronted with a difficult situation, consider these questions:

- 1. Is my action or decision legal?
- 2. Does it comply with the values and standards of this Code and other DHL Group policies?
- 3. Is it free of personal conflicts of interest?
- 4. Could my action or decision withstand public review? What would it look like in the Media?
- 5. Will my action or decision protect DHL Group's reputation as a company with high ethical standards?

If the answer to each question is “yes”, your action or decision is most likely correct and compliant with the following principles of conduct. If you are not sure, ask. And keep asking until you are sure!

If in doubt, contact your manager, the responsible HR or legal department, or the compliance officer.

Always bear in mind that a violation of our standards may not only cause our company considerable financial damage but can also have a serious impact on our image and lead to a loss of confidence on the part of our customers, employees and shareholders.



## **OUR STANDARDS OF WORKING TOGETHER**

- ✓ DIVERSITY AND INCLUSION
- ✓ SUSTAINABLE EMPLOYEE ENGAGEMENT

## DIVERSITY AND INCLUSION

The diversity of our employees is our genuine strength. We promote an inclusive work environment that values the diversity of our employees and in which everybody feels accepted and can be their best every day. It is our firm belief that diversity and inclusion contribute to our company's success.

The main criteria for employee selection and promotion are skills and qualifications.

We expressly reject any form of discrimination based on gender, ethnic and national origin, race, color, religion, age, disability, sexual orientation and identity or any other characteristic protected by law. All of us are called on to contribute to an environment of respect that precludes any kind of harassment, including workplace bullying, unwelcome sexual advances, unwanted physical contact, inappropriate propositions, or a working environment tainted by insulting jokes and remarks or demeaning comments. We do not tolerate any kind of violence in the workplace, including but not limited to threatening and intimidating behavior.

**?** Why did the older team member treat the new one so condescendingly from the very start? He thinks young people cause more work than the support they provide.

### Here is what you can do:

- ✓ Contribute to a working atmosphere based on trust, open-mindedness and mutual respect.
- ✓ Speak up if you feel that you or others are being disadvantaged or, worse, discriminated against.
- ✓ Be unbiased and avoid prejudging others.

 **Take advantage of our training courses on diversity and inclusion.**

 **DHL Group Corporate Diversity and Inclusion Statement**



**!** This is probably a case of prejudice, stereotyping or bias, things people are often unaware of. Ask him to reflect on his decisions, words and actions instead of jumping to conclusions about others.

## SUSTAINABLE EMPLOYEE ENGAGEMENT

We firmly believe that the motivation and engagement of our employees are an important differentiating factor in our industry and make an essential contribution to our business success. It is for this reason that mutual esteem and respect are part of our shared values. We are committed to fair and open discussions and to dealing constructively with different opinions to ensure that we reliably achieve our common objectives.

### Here is what you can do:

- ✓ Use our annual Employee Opinion Survey (EOS) as an invitation and starting point to open dialogue within your teams.
- ✓ Promote long-term employee engagement by knowing and understanding the tools and measures relevant to your area so that you can design and implement successful activities in cooperation with employees and managers.
- ✓ Foster team spirit and engage for example in Group-wide or local initiatives and events such as Global Volunteer Day.





## **OUR CORPORATE RESPONSIBILITY STANDARDS**

- ✓ HUMAN RIGHTS
- ✓ HEALTH AND SAFETY AT WORK
- ✓ ENVIRONMENT AND CLIMATE PROTECTION

## HUMAN RIGHTS

Respect for human rights is a cornerstone of our activities. As a signatory, we are committed to the principles of the United Nations Global Compact. We also respect the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work in accordance with national law and practice. Within our sphere of influence, we respect human rights in accordance with the Universal Declaration of Human Rights and the UN Guidelines on Business and Human Rights. We expressly reject all forms of forced or compulsory labor and child labor.

Our employees are free to join or not to join a union or employee representation body of their choice, free from threat or intimidation. We recognize and respect the right to collectively bargain in accordance with applicable law.



**?** What is the significance of human rights for a global enterprise?

### Here is what you can do:

- ✓ Speak up if you feel that human rights are not being observed.
- ✓ Contact your manager or your HR department.

**Take advantage of our training courses on employee relations and human rights.**

**Human Rights Policy Statement**

**!** In today's globally interconnected economy, respect for human rights has become a basic value for all businesses. Our customers, investors and employees all over the world expect us to adopt a clear stance. In 2006, we committed ourselves to supporting the protection of international human rights as one of the ten principles of the UN Global Compact. Our training courses and workshops help to raise awareness of respect for human rights as a common practice.

## HEALTH AND SAFETY AT WORK

The safety, health and well-being of our employees are top priorities for us, so we place great importance on compliance with our occupational health and safety policies and with legal regulations and industry standards.

To promote physical and mental well-being over the long term, we expect our managers to provide for a healthy working environment. At the same time, all employees are likewise called on to take personal responsibility in this regard.



**?** How can I get involved in workplace health and safety?

### Here is what you can do:

- ✓ Adhere to the existing occupational health and safety policies. They are there to protect you!
- ✓ Familiarize yourself with our Safety First Framework, which defines Group-wide standards for occupational health and safety.
- ✓ As a manager, ensure that employees can participate in all required health and safety trainings.
- ✓ Take advantage of the preventive and precautionary healthcare measures.

**Take advantage of workplace safety trainings offered by your business unit.**

**Occupational Health and Safety Policy**

**!** You can participate in various activities in your business unit to prevent workplace accidents and work-related illnesses, or simply learn to give first aid.

## ENVIRONMENT AND CLIMATE PROTECTION

Due to the size of our company and its significance for global commerce, we have a particular responsibility with respect to the environment. Our business activities are primarily guided by our commitment to minimize the impact on the environment and the climate. Our Group-wide environmental and climate protection program is predominantly aimed at preventing and reducing emissions of greenhouse gases and air pollutants. Here too, the following applies: Every single contribution made by our employees helps to reduce our carbon footprint.



**?** What contribution to reducing our logistics-related greenhouse gas emissions is a warehouse worker like me expected to make?

### Here is what you can do:

- ✓ Train yourself to adopt good environmental habits: Switch off equipment when it's not in use and print only when necessary ("paperless office").
- ✓ Arrange video or online conferences more often instead of going on business trips.
- ✓ As a buyer, make "greener" purchase decisions.
- ✓ Get involved in our environmental and climate protection activities.
- ✓ Take the initiative and suggest more environmentally friendly solutions wherever possible.

 **Pass the Certified GoGreen Specialist (CGGS) program.**

 **GoGreen Guidelines and Policies**

**!** Every one of us can make a contribution in our everyday lives. Ensure efficient power consumption when using equipment.





## **OUR STANDARDS FOR BUSINESS ACTIVITIES**

- ✓ WORKING WITH SUPPLIERS
- ✓ ACCOUNTING AND REPORTING
- ✓ ANTI-CORRUPTION AND ANTI-BRIBERY
- ✓ GIFTS, HOSPITALITY AND OTHER BENEFITS
- ✓ FREE COMPETITION
- ✓ CONFLICTS OF INTEREST
- ✓ BAN ON INSIDER TRADING
- ✓ MONEY LAUNDERING
- ✓ CUSTOMS, EXPORT CONTROLS AND SANCTIONS

## WORKING WITH SUPPLIERS

We are in dialogue with our suppliers around the world and share with them our basic principles of ethical behavior, compliance with legal standards and respect for the environment. We expect them to base their actions on the same principles.

In our Corporate Procurement Policy we commit to buy products and services from suppliers and subcontractors in accordance with our standards, which include our DHL Group Supplier Code of Conduct.



### Here is what you can do:

- ✓ Refer to our Corporate Procurement Policy and our Supplier Code of Conduct.
- ✓ Order in accordance with our Corporate Procurement Policy, including our DHL Group delegation of authority guideline and a clear segregation of duties.
- ✓ When selecting suppliers, use standardized processes, which are aligned with the divisional Purchase-to-Pay process owners and Corporate Procurement.

 **Corporate Procurement Policy**

 **Supplier Code of Conduct**

## ACCOUNTING AND REPORTING

The correctness and accuracy of accounting and financial reporting records provide the basis for our decision-making processes. We expect all business transactions in our accounting and reporting systems to be reported in a timely, accurate and complete manner in accordance with established procedures and applicable accounting standards.

Documents and reports must contain the necessary information about all transactions and be stored in accordance with corporate guidelines and relevant laws and regulations.

### Here is what you can do:

- ✓ Observe our accounting-related internal control system (ICS) that is intended to ensure the correctness of our (consolidated) accounting and financial reporting.
- ✓ Accounting errors are to be strictly avoided and material appraisal errors promptly and transparently reported.

 **Financial Policies and Guidelines**



## ANTI-CORRUPTION AND ANTI-BRIBERY

Corruption harms both our company and the countries in which we operate. We do not tolerate corrupt behavior. In our relationships with business partners and public officials, we do not provide or accept payments or benefits that are intended to, or might appear to, influence business decisions or to otherwise gain an improper advantage. This includes so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.

We are actively involved in the fight against corruption, for example through our support of the United Nations Global Compact. Compliance with applicable anti-corruption laws is indispensable in all of our business activities.

### Here is what you can do:

- ✓ Observe our Anti-Corruption and Business Ethics Policy.
- ✓ Take preventive measures by avoiding all forms of potential corruption and bribery. Corruption is illegal. It can result in fines or prison sentences and loss of employment.
- ✓ If you have any questions, contact your manager, your Business Unit Compliance Office or the legal department.



**Take the anti-corruption online training course.**



**Anti-Corruption and Business Ethics Policy**

**?** During a tender process I received a call from the customer's procurement manager. He said the contract could go my way but on one condition: If I provide him – under the table – with a cash “incentive” he will award the contract to DHL instead of one of the competitors. It would mean I hit my targets and even with such a payment to the customer's manager this is still very profitable for DHL. Can I go ahead?

**!** No, this would be a breach of the Code of Conduct. Accepting such a demand would qualify as an act of corruption and could result in criminal proceedings and even loss of your employment. Report the situation to your manager and involve the relevant Compliance Office. They will support you in handling the matter appropriately.

## GIFTS, HOSPITALITY AND OTHER BENEFITS

Gifts, hospitality and other benefits are only permitted in day-to-day business as long as they are within socially accepted norms. In particular, they may not be, nor give the impression of being, able to influence current or future business decisions.

Only gifts, hospitality or other benefits that comply with the principles of our Anti-Corruption and Business Ethics Policy may be given or accepted. If necessary, obtain the approvals listed there.

Particularly strict rules apply if you have business dealings with public officials. Be sure that you are familiar with and adhere to the guidelines set out in the Anti-Corruption and Business Ethics Policy when interacting with public officials.



A supplier invited me to a game in which my favorite team is playing. I would really like to go because I would finally get to see the VIP area. Am I allowed to go?

### Here is what you can do:

- ✓ Observe our Anti-Corruption and Business Ethics Policy. It includes clear criteria for determining what gifts, hospitality and benefits may be given or accepted and whether approval is required.
- ✓ If in doubt, decline gifts, hospitality or other benefits or contact your Business Unit Compliance Office.



**Anti-Corruption and Business Ethics Policy**

**!** Always consider whether the invitation might involve return favors. Check the criteria in the Anti-Corruption and Business Ethics Policy and determine whether you need approval from your manager or your Compliance Office. The actual value of the invitation is also a factor.

## FREE COMPETITION

We are committed to the principles of free enterprise and open competition. Company business must be conducted on the basis of merit and open competition. We hire third parties, such as suppliers, consultants or other intermediaries, only after careful and fair assessment. We are legally bound to make business decisions in the best interests of the company and without any forbidden restraints such as illegal collusion or agreements with competitors. We avoid any conduct that violates antitrust laws.



**?** Am I permitted to use publicly available (price) information from competitors?

### Here is what you can do:

- ✓ Observe our Competition Compliance Policy. Compliance with it is mandatory.
- ✓ Inform your manager in the event that competitors express an interest in reaching agreements on matters such as pricing, allocation of customers/ markets, or bids.
- ✓ Do not exchange information with competitors on matters such as prices, margins, customer information (including revenue and discounts) or strategy.

**👤** Take our online training course on competition law.

**📄** Competition Compliance Policy

**!** The key issue is whether the information is publicly available. Antitrust law allows the free use of information available from annual reports, online reports, trade journals or press releases.

## CONFLICTS OF INTEREST

We expect you to maintain high ethical standards in dealing with conflicts of interest. A conflict of interest exists if your private activities or relationships could, or could appear to, result in you no longer being able to perform your duties for DHL Group independently and objectively.

Relationships that could lead to a conflict of interest include family ties, partnerships with business partners and competitors, or shares or investments in their companies.



**?** Soon I will be negotiating with various suppliers. I am related to the managing director of one of the suppliers. Can I award her the contract without reservations if she provides the best quote?

### Here is what you can do:

- ✓ Observe our Anti-Corruption and Business Ethics Policy. It also includes clear criteria regarding conflicts of interest.
- ✓ Notify your manager of any existing and potential conflicts of interest immediately. Measures to deal with the conflict of interest will be taken and documented in consultation with the responsible HR department.

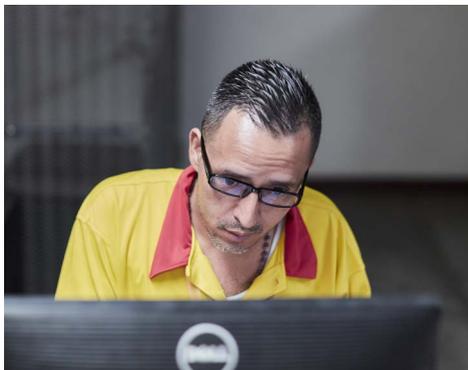
**📄** Anti-Corruption and Business Ethics Policy

**!** You need to inform your manager about this relationship. Your manager will arrange the necessary measures with the HR department. These could include ensuring that you are not involved in the selection process. If this is done at an early stage, your relative may even be awarded the contract in the end. It is important that the process be carefully documented.

## BAN ON INSIDER TRADING

We value the trust our investors place in us. As a listed stock corporation, we are obligated to immediately publish any information that is not publicly known, directly related to our company and likely to have a significant effect on its share price (so-called ad-hoc disclosure). Anyone who has inside information is not permitted to use or unlawfully disclose such information when trading in financial instruments (ban on insider trading). A violation is also committed, even if no profit is realized.

The purpose of insider trading bans is to protect the integrity of the financial markets and to ensure equal treatment of investors with regard to information access. Violations can cause serious damage to our company's reputation and to that of those persons who commit or are responsible for them. For these reasons, and not least because of the severe legal sanctions, it is essential that we



comply with our obligations under capital market law and avoid creating even the slightest impression that we might be violating insider trading bans.

### Here is what you can do:

- ✓ Observe our Guide on how to deal with inside information.
- ✓ Do not use inside information to buy or sell Deutsche Post shares and do not recommend to others to do so.
- ✓ Do not disclose inside information to anybody unless that information is needed for work-related tasks.
- ✓ In particular, avoid conversations or telephone calls about inside information in public places or while traveling.
- ✓ Keep documents containing inside information in a safe place.

 **Take advantage of our “Insider Trading Law” online training course.**

 **Guide on how to deal with inside information**

**?** Is it also a violation of the ban on insider trading if just a few shares are bought or sold using inside information?

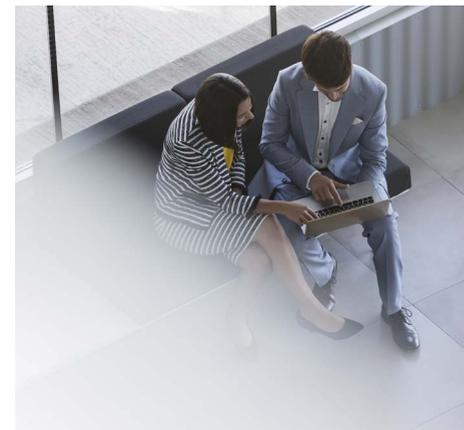
Does the cancellation or modification of an order to buy or sell financial instruments violate the ban on insider trading even if the order was placed before the inside information was obtained?

**!** Yes. The use of inside information to buy or sell even a single share constitutes a violation of the ban on insider trading.

Yes. The use of inside information to cancel or modify a buy or sell order for financial instruments is prohibited even if the order was placed before the inside information was obtained.

## ANTI-MONEY LAUNDERING

We refuse to do business with money that was acquired through criminal activity and is to be laundered. We expect you to comply with the laws and regulations governing the fight against the financing of terrorism.



### Here is what you can do:

- ✓ Take immediate action if it appears obvious that funds are of criminal origin. Possible red flags include exceptionally high cash payments, incoming payments from third parties who are not recognizably involved in the business relationship, and refusal of a business partner to provide complete and truthful contact information.
- ✓ Contact your manager or legal department if you suspect possible money laundering or financing of terrorism.



## CUSTOMS, EXPORT CONTROLS AND SANCTIONS

In the interest of responsible and ethically sound business practice, we always act in accordance with legal regulations and international conventions. We comply with the applicable laws and regulations on export controls, sanctions and customs clearance in all regions and countries. These relate not only to the movement of goods, they can also have an impact on things such as financial transactions, the use of technology, procurement, or the hiring of personnel.

### Here is what you can do:

- ✓ Comply with all regulations governing export controls, sanctions and customs clearance.
- ✓ Always observe all corresponding internal regulations and guidelines.
- ✓ Do not hesitate to consult your manager, Divisional Export Control Officer (DECO) or your legal department immediately if questions, legal uncertainties or suspicions arise.



**You can find DHL Group's Policies on the GTLO website in myNet.**



**?** I work in Procurement. Do I also need to comply with the laws and regulations governing export controls and sanctions?

**!** All DHL Group departments conducting business with third parties must comply with foreign trade regulations. This applies all the more if goods and technologies are being procured and used for the Group's own purposes.



## **OUR SECURITY AND INFORMATION MANAGEMENT STANDARDS**

- ✓ COMPANY PROPERTY
- ✓ DATA PROTECTION
- ✓ INFORMATION SECURITY
- ✓ SOCIAL MEDIA
- ✓ CORPORATE SECURITY AND  
CRISIS MANAGEMENT

## COMPANY PROPERTY

All of us have a responsibility to safeguard and properly use DHL Group property. The use of company property (including labor, supplies, equipment, buildings or other assets) for personal benefit is prohibited where not explicitly allowed by special agreements.

We attach great importance to the protection of intellectual property from unauthorized use or disclosure. Such property includes trade secrets; confidential information; copyrights; rights to trademark, patent and design protection; customer lists; business opportunities; and product specifications. This applies whether these intellectual property rights are held by a DHL Group company, affiliated companies or business partners.

### Here is what you can do:

- ✓ Inform yourself about the intellectual property situation with respect to patents, utility models or trademarks. If you have questions, contact the legal or patent department.
- ✓ Always respect confidentiality as stipulated in contracts or employment agreements.
- ✓ Report inventions developed during your work to your manager or HR department without delay.

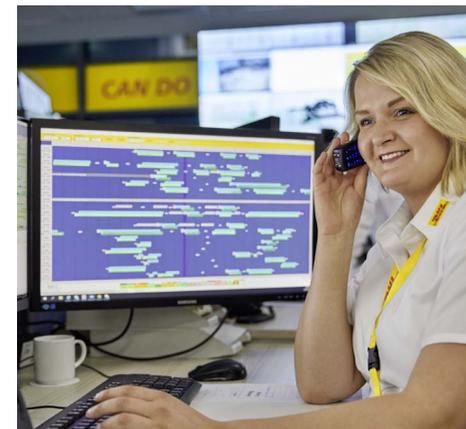


**?** I noticed an unusual use of the DHL Group brand. What can I do?

**!** Document the situation carefully and contact Corporate Communications or the appropriate marketing department. They will verify legitimate use of the brand.

## DATA PROTECTION

Our data protection management system guarantees appropriate, compliant and careful processing of personal data. A key component of this system is the DHL Group Data Privacy Policy, which lays down minimum standards for cross-border data transfer and the protection of data subjects during cross-company processing of personal data within the Group. This includes all information that gives insight into the identity of a natural person, such as name, address, telephone number, e-mail address, date of birth or social security number.



**?** My department would like to roll out a new IT system. What do I need to consider with regard to the processing of personal data in this system?

### Here is what you can do:

- ✓ Do not disclose any personal data unless you are legally permitted to do so.
- ✓ If you are unsure whether you are permitted to process certain personal data, ask the data protection officer at your location or contact the Global Data Protection department.

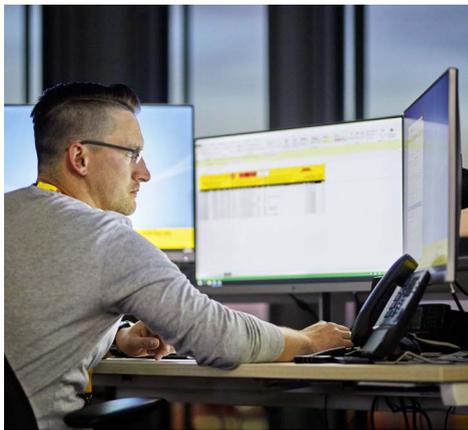
**Take advantage of our training courses on how to handle personal data.**

**DHL Group Data Privacy Policy**

**!** Before rolling out or updating an IT system, ask yourself what purpose the system serves and what personal data you really need to collect to fulfill that purpose (data minimization). Check the relevant legal basis for the processing of personal data. If in doubt, contact your local data protection officer or talk to the Global Data Protection department.

## INFORMATION SECURITY

Digitalization is a strategic imperative for enhancing the dialogue with our employees and customers and improving our operational efficiency. Safeguarding our IT infrastructure against tampering and unauthorized access is therefore a high priority for the Group. Strict information security standards that we use to protect information relating to our company and our customers, business partners and employees are essential to our business success. They enable us to maintain confidence in our services and safeguard our business continuity.



### Here is what you can do:

- ✓ Be wary of any e-mails from unknown external sources. Often they may appear to be from a trustworthy source but are designed to trick you into revealing important data (phishing) or downloading malware.
- ✓ The risk of being deliberately targeted by cybercriminals seeking to gain access to confidential company information is high.

 **Take advantage of our training courses on information security and follow the security tips that they provide.**

 **Information Security Policy**

 What should I pay particular attention to in order to protect myself from cybercrime?

 Think before you click! If you think an e-mail looks suspicious or might be a phishing attempt, report it.

## SOCIAL MEDIA

Respect, tolerance, honesty and integrity toward employees, customers and the general public also apply to our use of social media. As employees of the company, we must always express ourselves in a respectful and professional manner. Misuse of intellectual property or publication of confidential or internal data and information is prohibited.



### Here is what you can do:

- ✓ Internal matters must remain internal. Without exception, treat all sensitive information and business secrets pertaining to our company, our partners and our suppliers as strictly confidential. Do not mention clients, partners or suppliers without their consent.
- ✓ Information that is posted on our internal social networks is confidential. Do not share it on public social networks without consent.

 **Social Media Guidelines**

 Can I write comments on behalf of DHL Group?

 Only authorized personnel may post official statements, announcements and publications from DHL Group online. If you make remarks about DHL Group, go ahead and openly state your affiliation with the company. Be sure to write in the first person and, in doing so, make it clear that what is being said is your own opinion and not that of the company.

## CORPORATE SECURITY AND CRISIS MANAGEMENT

Security is our common asset! We provide a safe working environment for our employees and comprehensive protection against security threats and risks for our financial interests and our tangible and intangible assets. Essentially, this involves implementing crime prevention measures to protect our customers' infrastructure, processes, information and goods, as well as constantly monitoring the global security situation and reviewing our travel security standards. Our crisis management capabilities also help to ensure business continuity even in emergencies.



**?** I am planning a business trip to a country where there has been recent unrest, and I am concerned about my personal safety. Where can I get advice and assistance?

### Here is what you can do:

- ✓ Maintain confidentiality and integrity when handling information and trade secrets. Our customers and investors rely on us to exercise this responsibility conscientiously.

**Familiarize yourself with the relevant security challenges and their solutions in our training courses.**



**Corporate Security Policy**

**!** Before leaving on a business trip, you can consult an information portal for up-to-date information and security advice for individual countries. If you have any questions, contact the Corporate Security & Crisis Management department.





- ✓ **IF YOU HAVE QUESTIONS**
- ✓ **DEALING WITH VIOLATIONS**
- ✓ **CONCLUDING REMARKS**
- ✓ **POLICIES, GUIDELINES AND REGULATIONS**

## IF YOU HAVE QUESTIONS

If you have any questions about the **Code of Conduct**, contact the Diversity & Values department ([code-of-conduct@dphl.com](mailto:code-of-conduct@dphl.com)).

If you have questions about **specific topics**, contact the departments named in the individual guidelines.

## DEALING WITH VIOLATIONS

We encourage you to report any violations of this Code of Conduct by contacting your manager and your HR department or the compliance hotline. You can reach the latter - where legally permissible also anonymously - by phone or using a web-based system.

Your report will be kept confidential. No employee will be disadvantaged for any efforts made in good faith to report potential violations of the Code of Conduct.

Please note that, if required by applicable law, information regarding the identity of the employee reporting a possible violation may under certain circumstances be disclosed to the persons or authorities involved in investigations or subsequent judicial proceedings.

If infringements are reported, we will take appropriate measures for proper clarification. Employees who fail to adhere to the Code of Conduct may face appropriate employment or disciplinary action that may have consequences under civil and criminal law.

### Compliance hotline



Web application and telephone hotline

Available 24 hours a day worldwide

40 languages

## CONCLUDING REMARKS

The Code of Conduct is the basis and benchmark for all other guidelines and regulations that ensure responsible and ethically irreproachable conduct within the Group.

Together with the topic owners, we regularly review whether the standards set out in the Code of Conduct still meet current

requirements, for example due to changing international regulations or legal standards. Any changes to be made to the Code of Conduct are decided by DHL Group's Board of Management.

This version was adopted by the Board of Management on December 9<sup>th</sup>, 2020.

## POLICIES, GUIDELINES AND REGULATIONS

### OUR STANDARDS OF WORKING TOGETHER:

- Diversity & Inclusion Statement

### OUR CORPORATE RESPONSIBILITY STANDARDS:

- Human Rights Policy Statement
- Occupational Health & Safety Policy
- Corporate Health Policy
- GoGreen Guidelines & Policies

### OUR BUSINESS INTEGRITY STANDARDS:

- Supplier Code of Conduct
- Corporate Procurement Policy
- Financial Policies and Guidelines
- Anti-Corruption and Business Ethics Policy
- Competition Compliance Policy
- Guide on how to deal with inside information

### OUR SECURITY AND INFORMATION MANAGEMENT STANDARDS:

- DHL Group Data Privacy Policy
- Information Security Policy
- Social Media Guidelines
- Corporate Security Policy

