

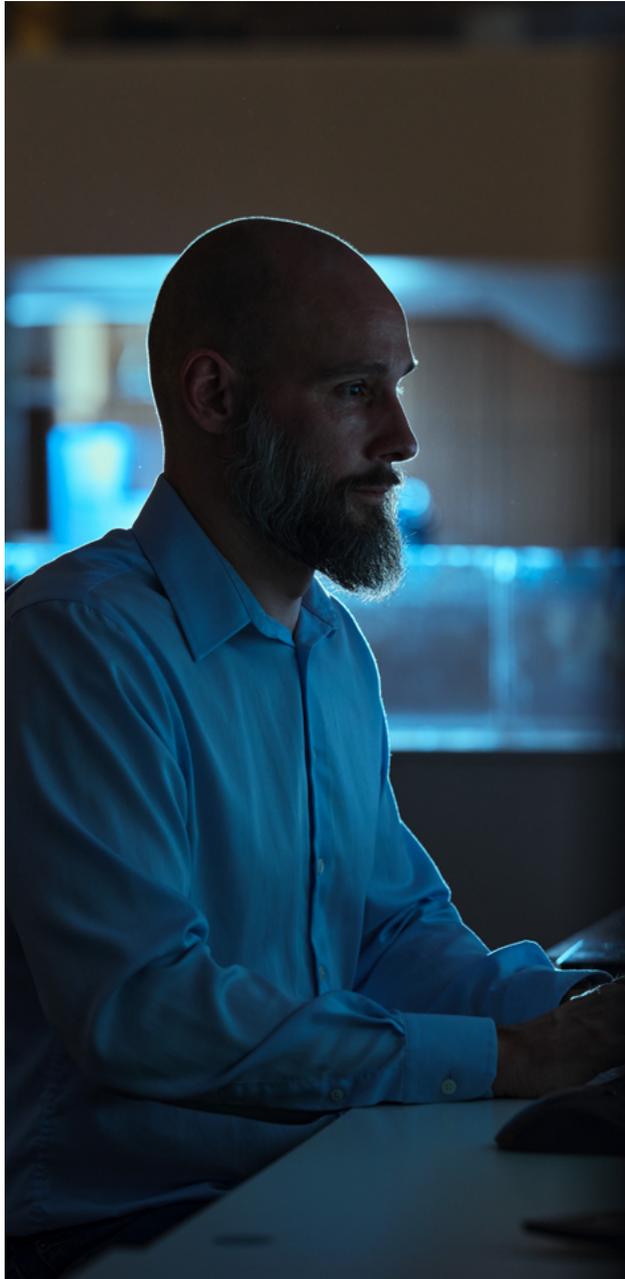


Global Transport and Logistics



# DSV CODE OF CONDUCT

OCTOBER 2024



# CONTENTS

<b>INTRODUCTION BY THE CEO</b> .....	3	<b>CONFLICTS OF INTEREST</b> .....	13
<b>ANTI-BRIBERY AND CORRUPTION</b> .....	4	Suppliers, customers and other business partners .....	13
Bribery .....	4	Employment of related parties .....	13
Facilitation payments .....	5	Monetary loans to employees .....	14
Kickbacks .....	5	<b>HUMAN RIGHTS</b> .....	15
Money laundering or financing of terrorism or other criminal activities .....	5	Compliance with international human rights standards....	15
Gifts and hospitalities .....	5	Forced labour, human trafficking and modern slavery .....	15
<b>DONATIONS AND CONTRIBUTIONS</b> .....	7	Child labour .....	15
Donations to charity and sponsorships .....	7	Working hours and remuneration.....	16
Direct political contributions .....	7	Discrimination and harassment .....	16
Lobbying and trade organisations .....	8	Safe working conditions .....	16
<b>COMPETITION</b> .....	9	<b>ENVIRONMENTAL IMPACT</b> .....	17
Limitation of competition.....	9	<b>CAREFUL SELECTION OF SUPPLIERS</b> .....	18
Meetings, conferences and vendor events .....	10	<b>EXPORT SANCTIONS AND CONTROLS</b> .....	19
<b>USE OF INFORMATION AND DATA PRIVACY</b> .....	11	Denied party screening.....	19
Confidential material and information .....	11	Restricted countries and regions .....	19
Use of inside information .....	11	Restricted goods .....	19
Data privacy.....	12	<b>SPEAK UP</b> .....	20
Responsible conduct.....	12	Protection from retaliation .....	20
		Follow-up on reports .....	20
		Ask for assistance.....	20
		Contact us.....	20

# INTRODUCTION BY THE CEO

**The DSV Code of Conduct is rooted in DSV's core values and functions and provides a framework for ethical conduct, aligning with our organisational policies and supporting our overarching purpose and strategy. Our strategy is anchored in our corporate purpose of keeping supply chains flowing in a world of change, acknowledging our role as part of the global infrastructure enabling world trade.**



With international supply chains becoming increasingly complex, we are focused on leveraging our leading global network, developing our industry expertise and digital solutions to create long-term value and sustainable growth for our customers, employees, shareholders and society as a whole. Upholding ethical business practices, fostering inclusivity and maintaining unwavering integrity across all operations are central to this commitment.

Our Code reflects these principles and encourages employees to prioritise transparency, accountability and respect in all interactions, both internally and externally. By adhering to this Code, we aim to cultivate trust with stakeholders and realise our mission of creating positive change within the global logistics landscape.

The Code of Conduct applies to all employees, management and the Board of Directors. All DSV companies and employees must observe national legislation, international regulations and standards, such as the OECD Guidelines for Multinational Enterprises, while following this Code of Conduct. The Code of Conduct cannot cover every issue that may arise across our global organisation and we therefore expect that you always exercise caution when conducting business on behalf of DSV. Where local rules and regulations require stricter standards than those set out in this Code of Conduct, local law takes priority.

The DSV Group's reputation and business depend on its familiarity and compliance with all applicable laws, rules and regulations. That is why, as a DSV employee, you have an obligation to comply with these. You are

expected to read, understand, and adhere to the Group's policies and procedures and to ask questions in case of uncertainty about any public laws or policies.

You are strongly encouraged to act promptly if you are faced with or suspect non-compliance with the Code of Conduct or applicable laws and regulations. Bring the issue forward through DSV's Whistleblower System, *Integrity Line*, your immediate manager, country management or any other internal channel you feel comfortable using.

If you are about to do something and are in doubt, 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?**

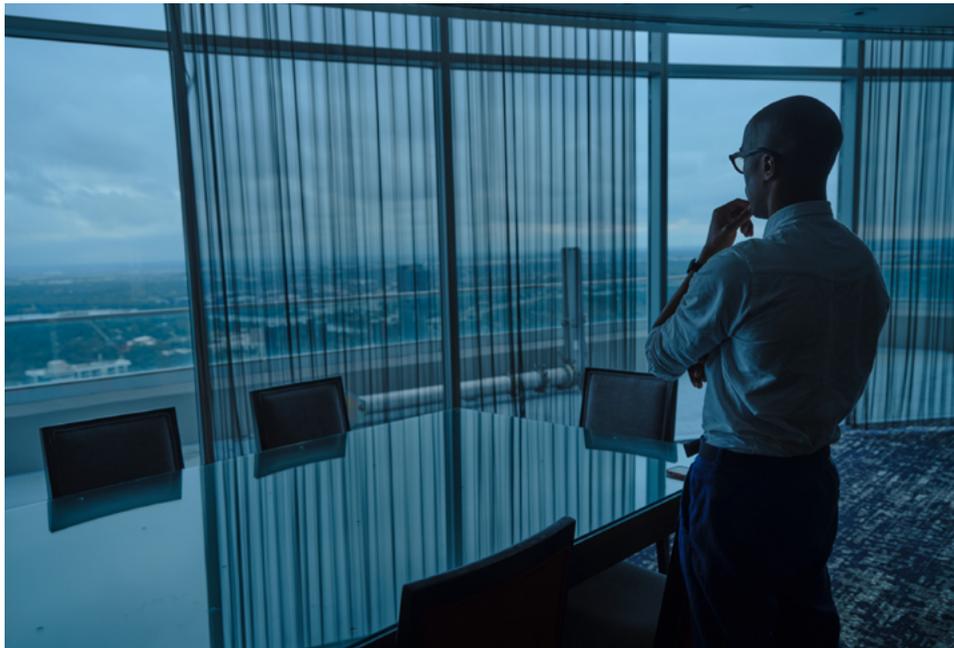
You always have the right to stop something and, if the answer is "no" to any of these questions, avoid doing it. If you are still uncertain, ask for guidance. Keep asking until you are certain or report the issue through the relevant channel.



**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. The Code of Conduct describes the specific rules to address bribery and corruption within DSV so that no employees take part in it. The rules described do not prohibit normal and appropriate hospitality given or received. If you are in doubt, please contact your immediate manager or country management.**



## BRIBERY

Bribery refers to the offering, promising, giving, 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 practice.

**You must not accept or offer a bribe 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

If you are asked to pay a bribe, the incident, including who asked for the bribe, must be reported to the DSV country management, Group Sustainability & Compliance or through the DSV Whistleblower system, *Integrity Line*.

## Examples of bribes:

### Offering a bribe:

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



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 DSV continues to do business with the supplier.



It would be an offence for you to accept 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 speed 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.

**You must not make facilitation payments or accept such practice in any country by any parties, including third parties acting on behalf of DSV.**

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

The only exception is if a DSV employee reasonably believes that their own or another’s’ life, health or safety may be at risk. In these instances, making the payment is not a violation.

If you are asked or forced to make a facilitation payment, the incident, including who asked for the payment, must be reported to the DSV country management, Group Sustainability & Compliance or through the DSV Whistleblower system, *Integrity Line*.

### 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 sum 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 employees to give or receive kickbacks to or from business partners.**

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

### Examples of kickbacks:

#### Offering kickbacks:

You get in contact with a potential new customer but have difficulties in convincing the buyer to choose DSV as their transport and logistics company. You agree that if the buyer selects DSV, they will personally receive a percentage of the value of their purchases with DSV.



Such an arrangement would be considered a kickback.

#### Receiving kickbacks:

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



Such an arrangement would be considered a kickback.

## MONEY LAUNDERING OR FINANCING OF TERRORISM OR OTHER CRIMINAL ACTIVITIES

Money laundering is the act of concealing or disguising money obtained from criminal activities and making them appear to have originated from legitimate sources or 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 or the funding of terrorism or any other criminal activities.**

You should be cautious of customers unwilling to give all required information or insisting on payments in cash.

If in doubt, always report such issues to the DSV country management, Group Sustainability & Compliance or through the DSV Whistleblower system, *Integrity Line*.

## 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 employees must be cautious that the exchanges DSV is involved in do not constitute bribes or can be perceived by others as an unfair influence.

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 of the recipient.

You are 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 by anyone as a bribe or an unfair influence.

**Example of reasonable gifts:**

Tickets/admission fees to events or similar with business partners as well as pens, calendars and small promotional items.

**Example of an unreasonable gift:**

DSV is currently looking for a new supplier, and you are supporting the selection of one of the suppliers that have bid on the contract. During the negotiation period, one of the suppliers has offered concert tickets to you.



This is an unacceptable gift as it is not related to the business conducted with DSV and is offered during a sensitive period. You cannot accept the gift.

If you are in doubt, contact your immediate manager, country management or Group Sustainability & Compliance.



# DONATIONS AND CONTRIBUTIONS

**Recognising the vital role DSV plays in community support, we encourage charitable giving, subject to approval and transparent conduct. DSV upholds integrity and impartiality in its philanthropic efforts to ensure that such efforts remain non-political, aiming to benefit communities and promote inclusivity. All of DSV's donations and contributions should be open, transparent and in accordance with applicable legislation.**



Therefore, DSV companies must keep an updated record of all charitable donations, lobbying activities and memberships in trade organisations, detailing the associated costs, purposes and approvals. Always ensure that donations, sponsorships and contributions to lobbying or trade organisations are not used as a cover for fraud, considered bribery or could be perceived as an unfair advantage. Additionally, ensure that all contributions and sponsorship activities are free from any conflicts of interest and are not intended to influence, or appear to influence, decision-making processes.

If you have any concerns or are in doubt about the permissibility of certain donations, contributions, memberships, etc., contact your immediate manager, DSV country management, Group Sustainability & Compliance or use the DSV Whistleblower system, *Integrity Line*.

## DONATIONS TO CHARITY AND SPONSORSHIPS

Sponsorships and charitable donations, whether through DSV's global charity partners or local community initiatives, are encouraged and can take various forms such as cash, services or materials. However, such contributions must be reasonable and approved by the relevant country management and should be conducted openly, transparently and in accordance with relevant laws and regulations. Additionally, it is essential to be vigilant about potential conflicts of interest that may arise.

Contributions should not be made with the intention of influencing business decisions or gaining unfair advantage, as this can undermine the integrity of DSV's operations.

Sponsorships are associated with pursuing business interests and/or achieving brand recognition through supporting events, activities or organisations financially or through the provision of products or services. Sponsorships should always be handled with integrity and transparency, ensuring they align with DSV's values and objectives.

DSV is committed to supporting local communities with integrity and impartiality, which means that all donations must be completely independent of any political connotation.

## 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 employees' personal choices or political beliefs, as long as these cannot be confused or misinterpreted as representing those of DSV.

## **LOBBYING AND TRADE ORGANISATIONS**

Given the potential risks associated with involvement in trade and industrial organisations, as well as lobbying activities, it is crucial to exercise caution and maintain transparency. These activities can sometimes lead to conflicts of interest, undue influence and breaches of anti-trust rules. Therefore, memberships in trade and industrial organisations should be kept to an absolute minimum, with any involvement remaining passive.

Similarly, lobbying activities must be carefully monitored and recorded to mitigate risks. All DSV companies are required to maintain an updated record of all national trade and industry organisation memberships, as well as any lobbying activities undertaken.



# COMPETITION

**DSV is committed to complying with all applicable competition and anti-trust legislation at all times. To ensure we do not breach legislation, you must be aware of situations that could have an impact on competition.**



**All agreements, regardless of contract form and contractual party, must always be negotiated in compliance with fair competition principles.**

## LIMITATION OF COMPETITION

**You must not conclude any contracts or agreements, formal or informal, or follow any non-binding arrangements/ understandings that have the purpose of or are likely to have the effect of substantially limiting competition.**

You must not participate in or be a party to:

- Price-fixing
- Market sharing (dividing markets)
- Limitation or controlling of production or capacity
- Exchange of information concerning prices or other terms and conditions regarding DSV companies, suppliers or other related third parties
- Meetings, conferences, forums, committees, etc. organised by a trade or industrial organisation and which may have an anti-competitive effect

## Example of price-fixing:

Local trade associations (e.g. freight forwarding associations) sometimes issue fixed tariffs for local services, e.g. an "import fee". Several freight forwarders have historically observed such fixed tariffs.



However, such a practice may be interpreted as price-fixing and is therefore considered a violation of the DSV Code of Conduct.

If you become aware of or are confronted with anti-competitive or questionable activities, you must report it to the DSV country management, Group Sustainability & Compliance or through the DSV Whistleblower system, *Integrity Line*.

## MEETINGS, CONFERENCES AND VENDOR EVENTS

DSV employees should avoid participating in vendor events where competitors are also present, as such events have a likelihood of creating price-fixing arrangements or discussions hereof.

You are advised to proceed with caution not only in physical meetings but also when participating in virtual forums (telephone meetings, social media forums, Teams meetings, webcasts, etc.) where information may be published or shared.

**You must not discuss business-related or potentially competition-restricting topics with competitors. You must ensure that you never share commercially sensitive information.**

You should always consider and seek approval from your immediate manager or the relevant DSV country management or, alternatively, Group Sustainability & Compliance before participating in events where competitors are present and business-related topics might be discussed formally or informally.

Generally, legal agreements should not be made during events such as conferences, workshops, auctions and forums, as such meetings are presumed to constitute collusion. Instead, agreements should be made in the ordinary course, outside such events and must always be in compliance with fair competition principles.

When attending a meeting or industry forum and the discussion falls on matters which may conflict with competition law, you must leave the room immediately and request that your departure and refusal to participate is noted in the minutes of the meeting. If minutes are not prepared at the meeting, employees must request the preparation of such minutes. If the request is not accommodated, employees must write their own minutes and inform the DSV country management and Group Sustainability & Compliance accordingly.

### Examples of potential conflicts:

The following non-exhaustive list of potential conflicts with competition laws may provide some guidance as to when particular caution is required.

You are approached by a competitor wishing to discuss or compare pricing policies.



Such action may be an attempt to engage in illegal **price-fixing**.

You are approached by a competitor wishing to discuss or compare capacity, forecasts, investments, technical developments, etc.



Such action may be an attempt to engage in illegal **limitation and controlling of capacity**.

You are approached by a competitor offering DSV an exchange of information regarding the company's prices, price changes, mark-ups, price differentials, surcharges, discounts, allowances, credit terms and conditions, volumes, customers, suppliers, market share, etc.



Such action may be an illegal **exchange of business information**.

You are approached by a competitor who offers to refrain from undercutting DSV's prices or approaching certain markets or certain customers if DSV refrains from approaching certain other markets or customers or from undercutting the competitor's prices.



Such action may be an attempt to illegally **divide markets**.

You are approached by another company with an offer to coordinate bids for tenders or to blacklist or boycott certain competitors, customers or suppliers.



Such action may be an attempt to illegally **divide markets or eliminate, prevent, restrict or distort competition**.

You are approached by another company or several companies with an offer to collectively approach a customer or supplier.



Such action may be an attempt to illegally **eliminate, prevent, restrict or distort competition**.

You are approached by another company and asked to make the conclusion of the contract dependent upon the acceptance of supplementary obligations that have no connection with the subject of the contract.



Such action may be an attempt to illegally **eliminate, prevent, restrict or distort competition**.

**Note:** Similarly, DSV staff must never approach any competitor in any way similar to the examples given below:

# 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, partners and employees. It is our duty to handle all information—including intellectual property and confidential data—with care. As a DSV employee, you must uphold confidentiality and follow our purpose and strategy.**



## CONFIDENTIAL MATERIAL AND INFORMATION

**You are not allowed to disclose any confidential or proprietary information received during or after employment at 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 harmful to DSV, our customers, suppliers and other business partners if disclosed.

If you are in doubt whether information should be classified as Confidential Information, ask your immediate manager or Group Sustainability & Compliance. For more information on what is considered confidential information, read our [Information Classification Policy](#).

## USE OF INSIDE INFORMATION

DSV A/S is a public limited company listed on NASDAQ Copenhagen (Denmark), and therefore DSV and its employees are subject to strict rules regarding the use of inside information.

Inside information means information of a “precise nature” which has not been made public, relating, directly or indirectly, to the DSV Group or its financial instruments

(shares or corporate bonds), and which, if it were made public, would be likely to have a significant effect on the price of those shares or corporate bonds.

Information of a “precise nature” means confidential information about circumstances which exist or may reasonably be expected to happen, or an event which has occurred or may reasonably be expected to occur; and is specific enough to enable a conclusion to be drawn as to the possible effect of such circumstances or event on the price of DSV shares or DSV corporate bonds.

It is up to you to assess whether information should be considered “inside information”. If you are in doubt, ask your immediate manager or Group Sustainability & Compliance.

If you have or can obtain inside information, you are considered an “Insider” and will be included on an insider list.

**You are prohibited from trading DSV shares or corporate bonds, directly or indirectly, while being in possession of inside information.**

The prohibition of trading DSV shares or corporate bonds (insider trading), also includes the encouragement of others (including relatives, friends and colleagues) to buy or sell DSV shares or corporate bonds or disclose inside information to the said group of people.

## DATA PRIVACY

At DSV, we have an obligation to ensure that all personal data is stored and handled in a safe way that meets data privacy laws. This implies that DSV, and you as an employee of DSV, may only collect, transfer, use and otherwise process personal data if you have a legitimate reason to do so, and if it is necessary for the services and the work we perform.

There are two types of personal data:

- Non-sensitive personal data is any information about individuals that can be used to identify them, directly or indirectly: name, photo, email address, bank details, employment information, GPS-location, a computer IP address, etc.
- Sensitive personal data is any personal data that reveals an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sexual orientation, social security numbers etc.

How to store personal data

- Only store personal data in Outlook, OneDrive and on other personal drives for a short time until you have processed it. Then delete it from your personal drives. Show particular attention to sensitive personal data.
- As soon as possible, move the personal data into a relevant IT-system, e.g. HR systems etc. When you have stored the data in a relevant IT-system, delete any copies of it from your personal files and Outlook.

### How to share personal data

Only share personal data with your colleagues or with third parties when you have a legitimate reason to do so, e.g. if consent to sharing personal data has been given.

We have implemented a set of 'Binding Corporate Rules' (BCR) to ensure that personal data is transferred in a safe and compliant way across borders within the DSV Group. The BCR is legally binding for all DSV entities mentioned in the BCR and for their employees.

You can read **DSV's Binding Corporate Rules** [here](#). To read more about how to handle personal data in your daily work and how DSV protects personal data, please look in the **DSV Privacy Handbook** [here](#).

If you have any questions about the handling of personal data, please direct them to your Local Privacy Responsible or to Group Sustainability & Compliance. You can read about how to find your Local Privacy Responsible [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.**

Posts and comments on social media should be formulated so that it is clear that they reflect personal views and not those of the company, unless posted by an authorised representative of DSV.

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, including comments or content about race, gender, disabilities, age, sexual orientation, pornography, religious beliefs and practices, political beliefs or national origin, irrespective of whether such message or posting is disclosed on an identified or anonymous user basis.

- 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, our employees and/or customers or suppliers.
- Any form of fraud or piracy of copyrighted materials, such as films or music and/or commercial software or other proprietary materials.
- Downloading of commercial software or any copyrighted materials belonging to a third party, unless downloading is covered by or permitted under an agreement concluded by DSV.

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.

# CONFLICTS OF INTEREST

**At DSV we always keep in mind the company's best interests in our business decisions while maintaining our integrity and the trust of our business partners. As such, we must avoid conflicts of interest interfering with DSV's best interest. A conflict of interest occurs when a person is confronted with choosing between or prioritising their professional obligations and their own personal interests. It is the responsibility of all employees to exercise sound judgement regarding conflicts of interest and to seek advice from their immediate manager or Group Sustainability & Compliance when in doubt.**



## SUPPLIERS, CUSTOMERS AND OTHER BUSINESS PARTNERS

**You must not participate in any commercial transactions between a DSV company and a supplier, customer or other business partner in which you have direct or indirect interests, financial, private or otherwise, unless the transaction is made on an arm's length basis (on market conditions).**

If you do have direct or indirect interests in a commercial transaction, then the transaction must be approved in advance by the Board of Directors of the relevant DSV company. This rule is subject to an annual triviality limit of EUR 5,000 below which transactions – presumed to be on arm's length basis – need not be disclosed or approved.

This also applies to transactions where the other party, whether an individual or a corporation, is related parties to country management members. Related parties include, but are not limited to:

- Family members and their companies
- Own companies
- Other companies in which the relevant member of management has significant influence

Transactions where the connection is with country management members must be approved in advance by DSV Group Management. This rule is subject to an annual triviality limit of EUR 5,000 below which transactions – presumed to be on

arm's length basis – need not be disclosed or approved.

In such cases, the Board of Directors of the relevant national DSV company or Group Management must be informed about significant conditions, such as quantity/volume, price, and terms of payment.

## EMPLOYMENT OF RELATED PARTIES

There must be no direct or indirect reporting relationship between related parties employed by DSV. This refers to all stages of employment, from the time of appointment and if a relationship develops after joining DSV. A direct reporting relationship is the reporting relationship between an employee and their immediate manager. An indirect reporting relationship is the reporting relationship between two employees in the same reporting line, but with other managers between them.

Appointing or keeping related parties in the same team or department should always be carefully considered, even if there is no direct or indirect reporting relationship.

Appointments and all other aspects of the employment must always be based on qualifications, performance, skills and experience.

## **MONETARY LOANS TO EMPLOYEES**

**Employees are not allowed to receive monetary loans from DSV.**

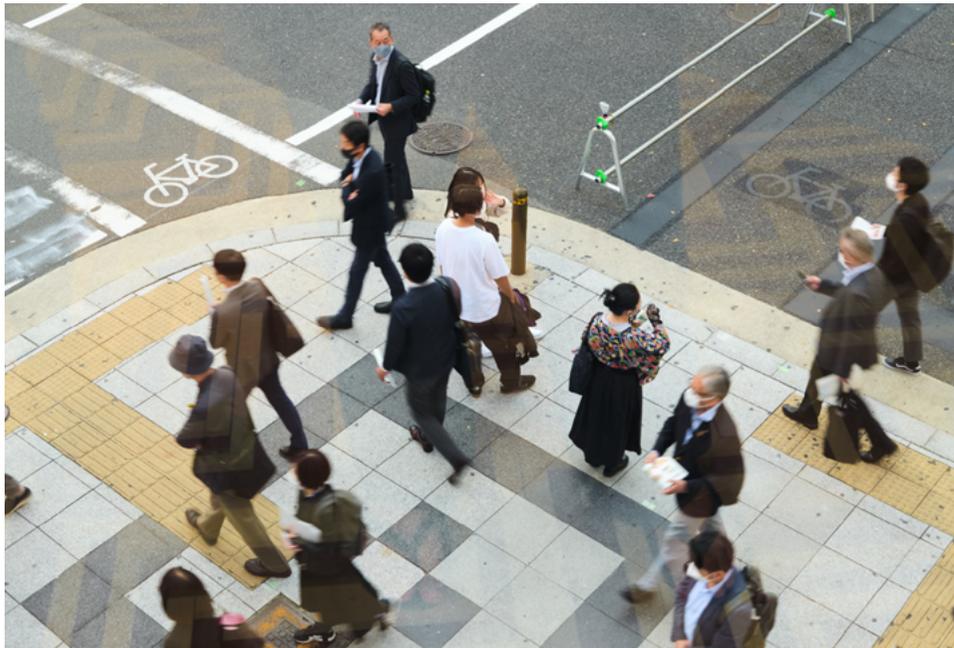
At DSV, it is prohibited to grant monetary loans to employees to uphold the principles of financial integrity and prevent conflicts of interest. By prohibiting such loans, DSV aims to ensure that the decision-making process within the organisation remains unbiased and free from undue influence.

This prohibition also extends to encompass related parties of the employee, such as immediate family members or close associates, to maintain a level playing field for all employees.



# 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. We are 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. We are committed to adhering to the core ILO Conventions, such as 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 the Children's Rights and Business Principles.

Alongside this Code of Conduct, DSV has in place a [Human Rights Policy](#) which further describes and sets our commitment and responsibilities.

## 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 and 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 Act Statement](#).

Employees must report any instance of human trafficking, forced labour or debt servitude to the DSV country management, to Group Sustainability & Compliance or through the DSV Whistleblower system, *Integrity Line*. The following requirements are in place and must be observed:

- All labour must be voluntary.
- We do not allow recruitment agencies to charge any fees or costs to prospective employees.
- DSV will not withhold employees' passport or government identification.
- Employees of DSV must receive a letter of confirmation of their employment conditions if required by national legislation.
- Employees have the right to join a union or labour organisation and to collective bargaining, in accordance with applicable legislation. DSV supports a constructive dialogue between employer and employee.

## CHILD LABOUR

The employment of children is prohibited in accordance with ILO Convention C138 on minimum working age. The minimum working 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 limits stated in DSV's Human Rights Policy, whichever is lower.

The remuneration of DSV 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 employee, 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.

We have formalised these beliefs in our [Diversity and Inclusion Policy](#).

## SAFE WORKING CONDITIONS

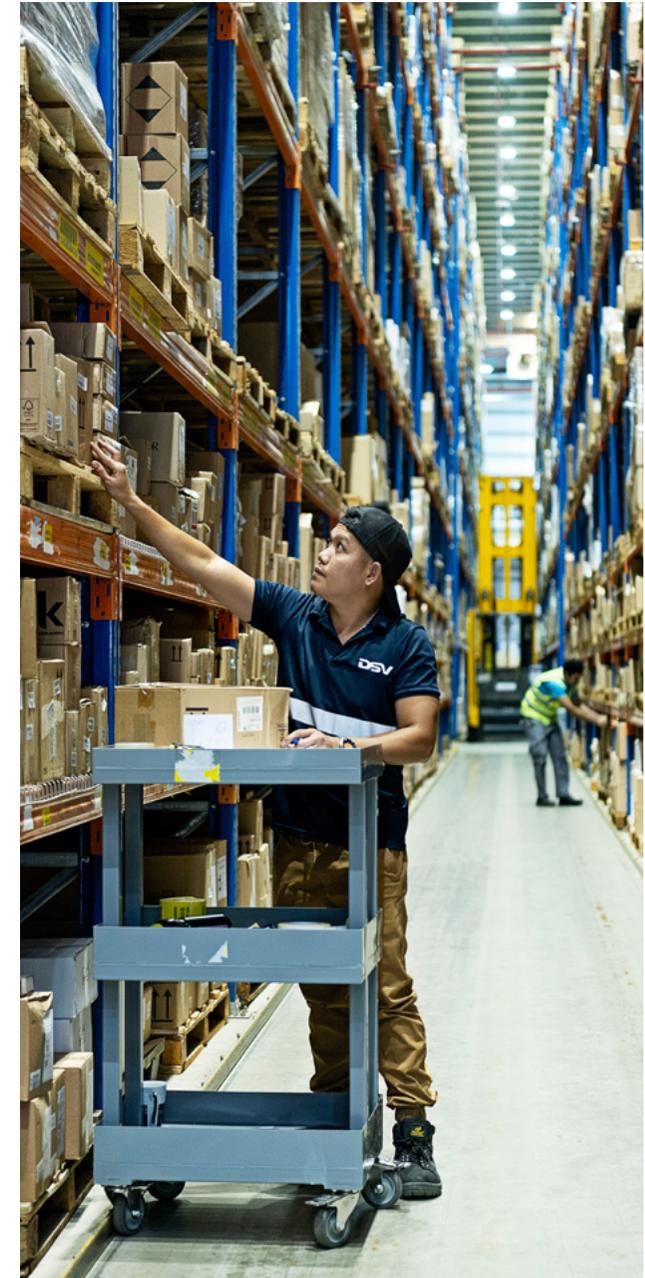
Safeguarding the well-being and supporting the actions of DSV's employees are essential to the success and future of DSV. All DSV companies must provide a physically and psychologically safe and healthy workplace by creating appropriate work conditions that meet all relevant legal requirements, creating job satisfaction and preventing illness, absence and injury related to unsafe work practices and risks.

**No employees are expected to put themselves or any other person(s) at risk during a DSV activity. It is the responsibility of all workforces to stop work when an unsafe condition or act arises.**

**All DSV managers are accountable for creating and maintaining a healthy and safe work environment for our employees and our third parties, which includes safe systems of work.** Safety must be ensured through appropriate instructions, which must be observed. Managers must establish an understanding of essential safety measures within their area of responsibility and initiate improvements when necessary.

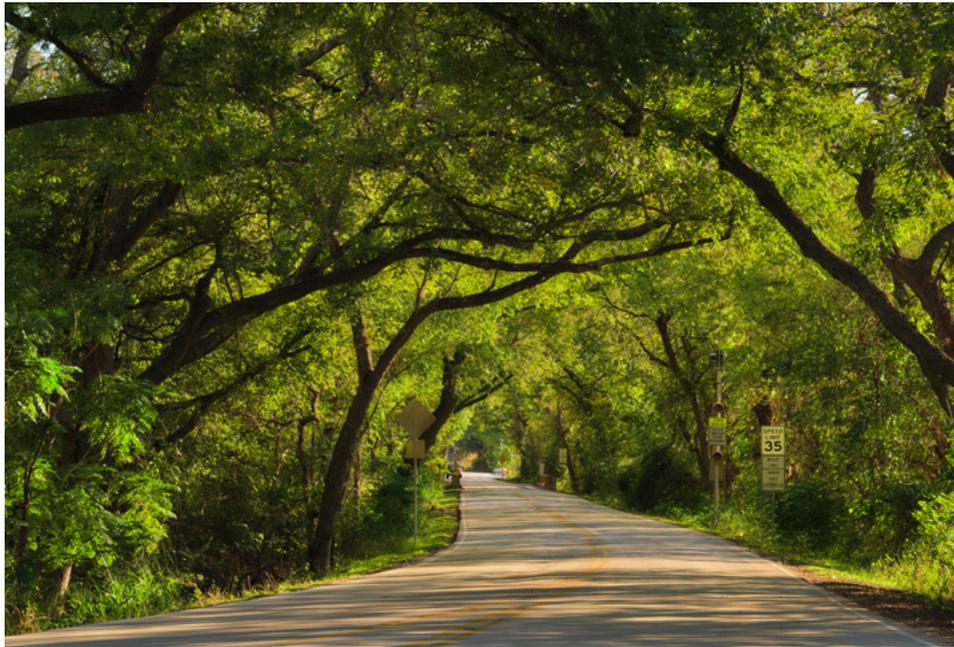
**Although DSV and its managers have the primary responsibility, all DSV employees are responsible for their own health and safety when performing their work** and must therefore comply with all safety regulations and processes as well as exercise proper care to prevent accidents. DSV prohibits the consumption or being under the influence of drugs or alcohol at work.

All workplace incidents must be reported promptly and recorded by the DSV country management to learn and facilitate continuous improvements. In case of serious injuries and life changing events Group Sustainability & Compliance must be notified immediately.



# ENVIRONMENTAL IMPACT

**Actors in the transport and logistics industry are one of the largest consumers of fossil fuels and significant contributors to waste generation, as many of the materials used for storing and transporting goods are often single use. As a freight forwarder, the majority of DSV's emissions come from subcontracted transport, making it crucial for us to engage with actors across our value chain to support the decarbonization of the industry.**



At the same time, we are responsible for reducing the negative impacts of our own operations. Achieving these goals requires a coordinated effort, including the ongoing support of our employees.

Our commitment is anchored in a global management system with defined policies, actions, and targets that address our most significant environmental impacts, such as climate change, air pollution, and waste generation. DSV has set a net-zero target that encompasses both our own operations and our value chain. Additionally, we have a waste management goal focused on increasing our recycling rate. Several DSV programmes are dedicated to investing in and providing new technologies, alternative fuels, and renewable energy, as well as implementing efficiency measures to optimize energy and resource use. We regularly monitor and report on our progress to ensure we are on track to meet these targets.

As part of DSV's sustainability efforts, it is essential for all employees to:

- Comply with environmental regulations and policies relevant to their work
- Familiarize themselves with DSV's Sustainability Strategy, including our net-zero target
- Follow our waste management procedures
- Actively seek and propose solutions that help reduce the environmental impact of DSV, our customers, and our suppliers

Reach out to DSV country management, Group Sustainability & Compliance, or the DSV Whistleblower system, *Integrity Line*, if you have any questions or concerns regarding environmental practices.

For more information on DSV's sustainability efforts, please refer to our [Sustainability Policy](#).

# CAREFUL SELECTION OF SUPPLIERS

**At DSV, we emphasise the importance of carefully selecting suppliers to ensure that our ethical standards and quality are upheld throughout our operations.**

Our suppliers are selected based on the criteria formulated in the [DSV Supplier Code of Conduct](#).

The DSV Supplier Code of Conduct describes what is considered appropriate business conduct by suppliers when they perform services on behalf of or supply services or products to DSV.

**You must ensure that suppliers are familiar with the DSV Supplier Code of Conduct and take relevant steps to ensure compliance. The Supplier Code of Conduct must be distributed to all suppliers where DSV has an estimated annual spend over €100,000.**



# EXPORT SANCTIONS AND CONTROLS

**At DSV, we 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.**

## 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.



# SPEAK UP

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



DSV has therefore made available a whistleblower system, the DSV Whistleblower system, *Integrity Line*, to all employees and external third parties to securely report any concerns or knowledge of misconduct. Employees should use any channels they feel comfortable using when raising concerns, whether through their immediate manager, local HR, country management, Group Sustainability & Compliance or the DSV Whistleblower system, *Integrity Line*.

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

## PROTECTION FROM RETALIATION

DSV does not tolerate any form of retaliation, including intimidation, harassment, discrimination, or adverse employment actions as a result of making a report in good faith.

The identity of a reporter will always be protected and not disclosed to anyone not involved in the investigation of a report. Unless prohibited by local laws, employees who wish to keep their identity anonymous when raising concerns, can do so safely through the DSV Whistleblower system, *Integrity Line*.

## FOLLOW-UP ON REPORTS

DSV takes all reported concerns seriously and will objectively investigate them promptly and thoroughly. Any incidents will be followed up with appropriate sanctions where required, leading up to and potentially including termination of employment. DSV will also ensure the appropriate safeguards are in place to prevent such misconduct from reoccurring.

## ASK FOR ASSISTANCE

If you need assistance or have questions or concerns about the DSV Code of Conduct, you should consult your immediate manager or Group Sustainability & Compliance.

## CONTACT US

**Group Sustainability & Compliance**  
+45 43 20 30 40  
[group.sustainability@dsv.com](mailto:group.sustainability@dsv.com)  
[ServiceNow](#)

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

**Learn more about our DSV Whistleblower system, *Integrity Line* at [dsv.com](http://www.dsv.com/responsibility)**  
<http://www.dsv.com/responsibility>