

Code of Business Conduct



At HUXE, logistics is our business — but people are our strength. We are a boutique, global operator powered by individuals who care deeply about what they do.



Code of Business Conduct

Summary

04	MESSAGE FROM THE FOUNDER/ MANAGEMENT/LEADERSHIP
05	PREAMBLE OUR COMMITMENT BEGINS WITH PEOPLE
06	A SAFE AND RESPECTFUL WORKING PLACE <ul style="list-style-type: none">• LABOR RIGHTS AND WORKING CONDITIONS• HEALTH, SAFETY AND WELLBEING• DISCRIMINATION• HARASSMENT
10	ACTING WITH INTEGRITY <ul style="list-style-type: none">• FAIR COMPETITION & NO BRIBERY• CONFLICT OF INTEREST• MONEY LAUNDERING• WORKING WITH SUPPLIER
16	OUR DUTY TO PROTECT THE PLANET
18	PROTECTING OUR PEOPLE AND OUR ASSETS <ul style="list-style-type: none">• USE OF COMPANY PROPERTIES• CONFIDENTIALITY AND DATA PROTECTION• LAW & SANCTIONS
21	DISSEMINATION OF THE CODE OF CONDUCT



Message from The Founders/ Management/ Leadership

At Huxe everything starts with our values.

From day one, we've believed in doing business with respect, responsibility, and hard work. These principles guide how we treat people, how we make decisions, and how we build lasting relationships with our customers and partners.

This Code of Conduct is here to help us stay true to those values. It sets the standard for how we work together and how we show up in the world, not just when it's easy, but especially when it's not. It's a reminder that integrity isn't optional; it's part of who we are.

We're not just here to grow, we're here to grow the right way. And if we do that, we'll have built something we can all be truly proud of.



Preamble: Our Commitment Begins with People

At HUXE, logistics is our business—but people are our strength. We are a boutique, global operator powered by individuals who care deeply about what they do. Every package we move carries the trust of a client, the precision of a colleague, and the reputation of our brand. Our agility is made possible by the human judgment behind every decision. Our integrity is built on the choices our people make every day.

This Code of Business Conduct is not just a document; it's a declaration of who we are. It defines how we work together, how we serve our partners, and how we grow responsibly. Whether you're in operations, client service, finance, compliance, or on the road, this Code is yours. It's your guide to act with integrity, solving problems ethically, and representing HUXE with professionalism and pride.

It is also your toolkit, for asking questions, making decisions, and raising concerns when something doesn't feel right. And it's a shared commitment to building a safe, inclusive, sustainable company where people can thrive and contribute meaningfully.



A Safe and Respectful Working Environment





LABOR RIGHTS AND WORKING CONDITIONS

At HUXE, we are deeply committed to upholding human rights and fostering a safe, respectful, and dignified working environment for all employees.

Our standards are aligned with the core conventions of the International Labour Organization (ILO) and apply across all our operations — both direct and indirect — including those of our suppliers, in accordance with the *HUXE Code of Conduct for Business Partners*.

HUXE has zero tolerance for any form of modern slavery, forced labor, or child labor.

We are dedicated to respecting international labor standards and complying with all relevant local laws, industry regulations, and collective agreements. This includes fair compensation, working hours, rest breaks, and public holidays.

HUXE fully supports employees' freedom of association and their right to join or be represented by a trade union. We respect these rights and will not interfere with them in any way.

What you should do:

- Understand and follow the terms of your employment contract.
- Respect your colleagues according to the Code of Business Conduct.
- Report concern or suspicions of a labour right violation to your manager.



HEALTH, SAFETY AND WELLBEING

We believe our people are at the heart of everything we do, and your health and safety are our top priority.

We are committed to creating a workplace where everyone feels safe, supported, and protected. We believe that all injuries and hazards are preventable, and we work every day to build a culture where safety is a shared responsibility — and an expectation for all.

Safety is everyone's responsibility. We should never compromise safety or feel pressured to cut corners. From warehouses to offices to transit vehicles, we follow procedures that prevent injury and reduce risk. That includes reporting unsafe conditions, using equipment properly, and encouraging others to do the same.

What you should do:

- Only perform tasks you are trained, competent, and capable to carry out safely.
- Always follow workplace safety rules, procedures, standards, and instructions, including those related to emergency preparedness.
- Practice safe working behaviors at all times. Look out for the safety of your colleagues and immediately stop any work that appears unsafe.
- Be a role model for safety by consistently demonstrating safe practices to coworkers, contractors, and business partners.
- Promptly report any incidents or near-misses that you are involved in, regardless of severity.
- Inform your manager of any physical or psychological condition that may affect your ability to work safely.

DISCRIMINATION

People are the heart of HUXE. That's why we are committed to creating a workplace where everyone is treated with dignity, fairness, and professionalism—regardless of gender, ethnicity, background, religion, ability, or identity. Discrimination has no place in our culture.

We also believe inclusion strengthens performance. Diverse teams think better, adapt faster, and serve broader markets. Everyone should feel seen, heard, and valued.

We are also committed to protecting the right of equal treatment and opportunities. We make decisions on hiring, promotions, and disciplinary actions based on performance, qualifications, competences, experience, and behavior and never on an employee's background or characteristics.

What you should do:

- Treat all colleagues with respect and fairness, both in person and in online interactions. Discrimination of any kind is not acceptable.
- If you witness or experience discrimination, report it promptly to your manager



HARASSMENT

At HUXE, we treat each other with dignity and respect and are committed to ensuring a safe and respectful workplace.

It means that every employee is responsible for fostering a work environment that is free from harassment.

Harassment refers to a range of unacceptable behaviors or practices that cause, intentionally or unintentionally, physical, psychological, sexual, or economic harm. It can happen as a single event or through repeated actions over time. Harassment may occur in the workplace or outside of work-related settings

Sometimes individuals may not realize that their words or actions are harmful. That's why it's important to always consider how our behavior impacts others.

Harassment can involve intimidation, humiliation, or abuse of authority — such as when someone uses their position or influence to mistreat others. Such behavior can create a hostile work environment and negatively affect the mental and physical wellbeing of employees.

HUXE strictly prohibits workplace harassment, violence, bullying, and any conduct that is disrespectful, offensive, or degrading, whether verbal, written, physical, or psychological. All employees are expected to treat one another with respect and dignity, and to contribute to a work environment that is free from harassment.

What you should do:

- Respect your colleagues with whom you interact, both in person and online.
- Promote a work environment free of harassment, violence, and bullying.
- Report concerns over harassment to your manager.

What can harassment look like?

- Making repeated jokes or comments directed at the same colleague in a way that causes discomfort.
- Intentionally excluding, isolating, or ignoring a coworker.
- Sending persistent and unwelcome messages, gifts, or invitations.
- Using insulting language, yelling, or displaying threatening or aggressive behavior.
- Misusing one's position of power to request favors unrelated to job responsibilities.
- Engaging in unwanted or inappropriate physical contact.
- Linking any sexual behavior or suggestion to opportunities for promotion or favorable evaluations.



Act with Integrity



BRIBERY

We operate with integrity. We are trusted by our colleagues, customers and supplier to conduct business with integrity. That means we don't offer or accept bribes or anything that could be seen as a shady deal. Our records must be honest and clear. Winning business is only worthwhile if we do it the right way. Everyone is accountable for acting legally and ethically in commercial matters.

Bribes are money, gifts, or anything of value offered to influence someone in order to get an unfair advantage, either for personal or professional gain. Bribes are illegal and can result in significant fines, reputational damage, and even imprisonment.

We are also responsible for our suppliers' actions and behaviour when they are working on our behalf. We cannot ask a supplier to do something that we, as HUXE employees, are not allowed to do ourselves, for example giving or accepting bribes or facilitation payments

What you should do:

- Never give a bribe or facilitation payment. If you are asked to do so, you must always refuse and report it to your manager and Compliance.
- If you fear for your safety or are being threatened, you should comply with the request then immediately report the incident to your manager and Compliance.
- Never ask a supplier to give bribes on HUXE' behalf. If you know that a supplier is engaging in bribery, you need to report this to your manager and Compliance.
- Never accept bribes from suppliers or anyone else. If you are offered a bribe, which can include excessive gifts or hospitality, you must always refuse and report the incident to your manager and Compliance.
- Remember, bribes are not always cash; they can also be excessive gifts, hospitality, or favors.
- Follow our due diligence screening processes when engaging with suppliers and customers.



GIFT AND HOSPITALITY

Gifts and hospitality are a common way to express appreciation and build business relationships. However, they can create the expectation of a favour in return which can put you in a difficult situation.

We trust our employees to exercise sound judgment when giving or accepting gifts and hospitality. These should always be modest in value, infrequent in nature, and never intended to influence business decisions or create a conflict of interest.

Examples of an acceptable gift include a box of sweets, or a bottle of wine. The most common acceptable types of hospitality include normal lunches and dinners with the intention of building and maintaining business relationships.

What you should do:

- Accepting: Only accept gifts and hospitality that are legal, appropriate, inexpensive, and infrequent.
- Giving: Gifts should be given to show courtesy and never with the intent of inappropriately influencing a decision



CONFLICT OF INTEREST

A conflict of interest can happen when your personal interests, like relationships, investments, or outside activities, influence, or appear to influence, the decisions you make at work. When you're balancing competing interests, it can be hard to remain completely objective.

Even when you believe you're doing the right thing for HUXE, others might see the situation differently and perceive your actions as self-serving.

Conflicts of interest can create an uneven playing field, or even just the perception of one, which can impact colleagues, suppliers, and business partners. In some cases, it can lead to higher costs, lower quality, or harm to HUXE's reputation. If not properly handled, a conflict of interest could even develop into something more serious, like corruption.

At HUXE, we count on our employees to act in the best interest of the company and to avoid situations where personal interests could get in the way. There are three main types of conflicts of interest, actual, potential, and perceived, and all of them should be disclosed and carefully managed.

Even if you're unsure whether something is a real conflict, it's always best to speak up. A perceived conflict can be just as damaging as an actual one. If you think you might be in a situation that could raise concerns, raise your hand early, transparency is key.

What you should do:

- Disclose any potential conflicts of interest to your manager so they can be managed to protect yourself and HUXE
- Discuss with your manager how to manage the conflict of interest and remove yourself from the decision-making process.
- Document how the conflict of interest was disclosed and managed.
- Perceived conflict of interest: It appears to others that you could influence a business decision for personal gain, even if you haven't.
- Actual conflict of interest: You are directly involved in a decision that results in personal benefit.
- Potential conflict of interest: There is a chance you could be in a position to influence a decision that may benefit you in the future.



ACCURATE RECORDKEEPING

At HUXE, keeping accurate and complete records is essential for making informed decisions and running our business effectively. Our records help guide strategy, support operations, and ensure accountability across the company.

We are committed to maintaining honest and reliable records, and to preventing and detecting any kind of fraud. Employees must be truthful, accurate, and thorough in everything they record.

All employees are expected to follow internal processes, company policies, and relevant standards to ensure our records remain a trustworthy foundation for the work we do.

What you should do:

- Do not falsify or mischaracterise any record, account, or transaction.
- Classify transactions in the proper accounting period, account, and cost center.
- Disclose full, fair, accurate, timely, and clear information to government, regulatory authorities, and auditors.
- Never destroy or dispose of information that might be needed for an investigation, audit, or legal proceeding.
- Familiarise yourself with our policies and follow all internal processes.





MONEY LAUNDERING

Money laundering is the process of making illegally obtained money appear legitimate. It is often linked to serious criminal activities such as terrorism, drug trafficking, tax evasion, and human trafficking. These illegal profits, often in cash, are typically funneled through offshore accounts, shell companies, real estate, or other assets to hide their origin.

HUXE is committed to conducting business with integrity and transparency. We do not allow our operations to be used for any form of criminal activity. We comply with all applicable anti-money laundering, anti-terrorism, and financial crime laws in the countries where we operate.

If you suspect any activity that may involve money laundering, you are expected to speak up and report it immediately.

What you should do:

- Follow our due diligence screening processes when engaging with suppliers and customers.
- Be proactive and look out for any financial transactions or activities which deviate from our normal processes.

SUPPLIER

At HUXE, we want to work with suppliers who share our values and commitment to doing business the right way. Our supplier relationships are built on trust and integrity, the same values that guide us in creating sustainable energy solutions for the future.

We choose suppliers based on their ability to do the job well and fairly, following a transparent and unbiased selection process. Every supplier is evaluated through our established procurement procedures, and we never skip steps when onboarding new partners.

To make sure we're working with reliable and responsible suppliers, we carry out thorough due diligence, including screenings and assessments, before any agreement is made.

HUXE can be held accountable for the actions of our suppliers, so we never ask them to do anything we wouldn't do ourselves under our Code of Conduct. All suppliers are expected to meet the standards outlined in the *HUXE Code of Conduct for Business Partners*

What you should do:

- Follow HUXE' processes for onboarding and managing suppliers, including the appropriate due diligence screening process.
- Ensure you select suppliers fairly, in an unbiased manner, focusing on quality, service, and price.
- Avoid or manage conflicts of interest with suppliers.
- If you are concerned that a supplier might be involved in illegal or unethical behaviour, or has a conflict of interest, report this immediately to procurement or compliance.



Our Duty to Protect the Planet



Environmental sustainability is a responsibility we all share, individually and collectively. As a logistics operator, we know our impact is real. That's why we are committed to reducing our footprint and improving our practices.

Sustainability at HUXE isn't the job of one department, it's everyone's. It means We expect every team member to think about their environmental impact, whether that's turning off a light, planning a more efficient route, or avoiding waste in packaging and operations.

We expect every team member to think about their environmental impact, whether that's turning off a light, planning a more efficient route, or avoiding waste in packaging and operations.

What you should do:

- Promote the reduction of our CO₂ footprint by using resources like energy and water more sustainably, and by avoiding or minimizing waste.
- Limit the use of hazardous materials and prevent emissions across all operations.
- Ensure that all environmental incidents are promptly reported and effectively managed.

HUXE ENVIRONMENTAL COMMITMENT

- Select LEED-certified structures for our facilities whenever possible.
- Reduce unnecessary use of paper, energy, and water.
- Calculate and report our CO₂ emissions, and choose low-emission transportation options when feasible.
- Prioritize reuse and recycling of materials across operations.
- Partner with and support environmentally responsible vendors and service providers.



Protect our People and our Assets





USE OF COMPANY PROPERTIES

Our systems, devices, software, and tools exist to help us work better, not for personal use. You are responsible for using company property professionally, keeping it secure, and reporting any loss, damage, or misuse immediately.

Improper use of company property is not only unprofessional, it can lead to operational risks and data breaches. Protect what you've been entrusted with.

Employees may occasionally use certain company assets, such as phones and computers, for personal purposes, provided the use is limited, lawful, and does not disrupt work responsibilities.

What you should do:

- Treat HUXE's assets with care and responsibility, just as you would your own personal property.
- Use company credit cards in line with HUXE's travel and expense policies, as well as any applicable local guidelines.
- Return all company-issued property, such as electronic devices and credit cards, when your employment with HUXE ends.
- Promptly report any unsafe, inappropriate, or unauthorized use of company assets.

CONFIDENTIALITY AND DATA PROTECTION

At HUXE, confidentiality is essential to how we do business. All employees are trusted with access to sensitive company information, including internal communications, pricing details, strategy documents, and client-related data. This information must only be shared with those who are authorized and have a legitimate need to know. It should never be discussed in public spaces, posted online, or forwarded to unauthorized individuals, even unintentionally.

Respecting confidentiality protects our colleagues, our partners, and our company's integrity. We keep what's private, private.

In addition to safeguarding company information, we also take personal data privacy seriously. Whether it concerns employees, customers, or business partners, HUXE processes personal data with care and responsibility. We only collect and use personal data for specific, legitimate purposes — and never for anything unrelated. The data we collect is limited to what is necessary, kept accurate, and stored only for as long as required by law or for the purpose it was collected.

We make sure that individuals understand how their data is being used by being transparent and providing clear information about our practices.

Protecting personal data is more than a legal requirement — it's a matter of trust and respect for the people we work with.

**What you should do:**

- Communicate online with respect and integrity. Remember that any online activity you perform on a company device can be linked back to you and to HUXE
- Always safeguard company information. This includes protecting intellectual property, confidential data, trade secrets, and any sensitive business information.
- Use only the official tools and software approved by HUXE. These systems are selected to meet security, legal, and operational standards.
- Handle personal data only when it's truly needed for your work. Collect, use, or share it only if it's relevant to the task at hand and aligned with company responsibilities.
- Always follow internal data privacy guidelines. Make it a habit to understand and apply the policies and procedures designed to protect personal information.
- Remove personal data when it's no longer required. Always follow the company's rules for data retention and deletion to avoid holding on to information longer than necessary.
- If something doesn't seem right, ask. For any questions about how to manage or protect personal data, reach out to the Privacy Team at DataPrivacy@huxe.net
- Act fast if you suspect a data breach. Immediately report any potential security incident or loss of personal data to the IT Service Department.

Personal data refers to any information that can be used to identify an individual, either directly or indirectly. This includes, but is not limited to:

- Full name
- ID or passport number
- Home or mailing address
- Email address

SANCTIONS

Economic sanctions prevent HUXE from doing business with certain individuals, entities, or countries. Failing to comply with these restrictions can seriously harm our reputation and put our business at legal and financial risk.

To prevent this, we must apply due diligence and screening processes to ensure all transactions align with applicable sanctions and laws.

What you should do:

- Always perform due diligence screening before working with customers or business partners, as some parties may be restricted under international sanctions.



Dissemination of the Code of Conduct

The *HUXE Code of Conduct* is made available to all employees and relevant business partners to ensure a clear understanding of the ethical standards and expectations that guide our work.

To support awareness and compliance:

- The Code is distributed during onboarding and available in our website www.huxe.net
- Regular training sessions and refresher courses are provided to reinforce key principles.
- Updates to the Code are communicated promptly, and employees are expected to review and acknowledge any significant changes.
- Leaders and managers are responsible for promoting the Code within their teams and leading by example.

If you have questions or need clarification, you are encouraged to reach out to your manager, Compliance, or the relevant support function.

