



DHL Group

Anti-Corruption Statement of Principles

Introduction

DHL Group is the world's leading logistics company operating in over 220 countries and territories. Our Group connects people and markets and is an enabler of global trade. In line with our purpose of "Connecting People. Improving Lives.", we are committed to maintaining the highest standards of business integrity and lawful conduct to remain the Employer, Provider, Investment and Green Logistics Provider of Choice. To fulfill this commitment, DHL Group has a zero-tolerance policy for bribery and other forms of corruption.

Corruption and bribery are illegal in almost all countries, they undermine the rule of law and are one of the greatest barriers to economic and social development in the countries and communities our Group operates in and connects.

At DHL Group, we address corruption and bribery risks to help fulfill all legal obligations and we avoid investigations, fines or other penalties. However, we primarily promote lawful conduct to protect our biggest asset: the trust of our customers, employees and investors.

This Anti-Corruption Statement of Principles (the "Statement") captures the fundamental principles of DHL Group's Code of Conduct and Anti-Corruption & Business Ethics Policy, both of which form the bases and benchmark for responsible and lawful conduct within the Group.

1. SCOPE

This Statement applies to all employees, officers and directors (hereinafter referred to as "Employees") of Deutsche Post AG and all its subsidiaries, affiliates, and any other entities directly or indirectly controlled by Deutsche Post AG (collectively, "DHL Group").

2. ANTI-CORRUPTION COMMITMENT

Employees are not allowed to offer, provide nor authorize bribes to any individuals, including public officials, whether directly or indirectly through third parties. Further, Employees are not allowed to request or accept bribes of any kind, whether directly or indirectly through third parties.

To manage our bribery and corruption risks, DHL Group has implemented a comprehensive range of procedures and controls related to:

- interactions with public officials;
- gifts and hospitality;
- third party due diligence;
- donations and sponsorships;
- conflicts of interest;
- accurate record keeping; and
- incident management.



2.1 A bribe may be monetary or non-monetary, tangible or intangible and may be paid directly or indirectly. It can be facilitated through various means, including:

- inappropriate gifts
- cash or cash equivalents, such as vouchers, gift cards or lottery tickets
- excessive hospitality and entertainment
- unreasonable discounts, loans or credit terms
- financial kickbacks, rebates or incentives
- overpayments to business partners
- misuse of assets or other in-kind contributions
- local sponsorships, donations and community investments
- political contributions
- biased employment decisions or paid internships, or
- other non-commercial benefits

Employees must remain vigilant to the risk of overt and covert bribes and are encouraged to report any suspected violation of the Statement.

2.2 Gifts and Hospitality

While reasonable gifts and hospitality are acceptable in the context of healthy business relationships, when they are excessive or overly repetitive, they can be used as a method of bribery. To safeguard our business partner relationships and keep them healthy and commercially-oriented, our Employees must only give or accept gifts and hospitality that:

- does not contravene applicable local laws and does not violate any known policies applicable to the business partner;
- is reasonable regarding its value, the level of seniority of the recipient and does not form part of a pattern or a series of Benefits which, if taken together, would represent an inappropriate benefit;
- is not motivated or appears to be motivated by a desire to influence pending or upcoming business decisions e.g., in the context of a tender process or contract negotiations; and
- has not been demanded or solicited by the intended recipient.

2.3 Donations and Sponsorships

Our Employees are not allowed to make donations or contract sponsorships with the intent to provide or disguise a bribe, or to gain an illegal or improper business advantage. Before we make donations or enter into sponsorship agreements, Employees carefully assess the recipient to help verify that any funds provided are used for the intended purpose and that they reflect good business ethics.

2.4 Public Officials

Interacting with public officials can carry an increased risk of corruption. Employees need to be particularly careful when dealing with public officials and must not provide them with gifts or entertainment. It is strictly forbidden to provide any cash or cash equivalents to public officials, including Facilitation Payments (as defined below).



2.5 Facilitation Payments

Facilitation Payments are generally small gifts or cash payments, that are not required by law, made to a public official personally to perform routine, non-discretionary actions. Employees are not allowed to provide, initiate or approve the provision of such payments, including those made indirectly through intermediaries. If Employees are asked to make a Facilitation Payment, they are encouraged to report the matter to our Compliance office immediately.

2.6 Conflicts of Interest

Employees must disclose and mitigate potential conflicts of interest as they may impair their independence and objectivity. A conflict of interest is any personal or financial interest or obligation that may interfere with an Employee's ability to objectively perform job duties. Examples include a relationship by blood or marriage, romantic partnership, close friendship, side employment and ownership or investment in business partners or competitors.

2.7 Third Parties

We expect our suppliers, subcontractors and all other companies we engage with to adhere to the same lawful business standards. For this purpose, we have established a group-wide Supplier Code of Conduct and perform risk-based compliance due diligence before we enter a business relationship with our suppliers. Employees are not allowed to use or authorize any of these business partners to engage in corrupt practices on our behalf.

2.8 Accurate record keeping

We require that all payments are properly recorded and accounted for in DHL Group's books and records.

3. SPEAK UP CULTURE

Employees are responsible for helping to maintain the requirements set out in this Statement. We encourage our Employees to address suspected violations of this Statement through the established and accessible reporting channels, including local management, Human Resource partners or their Compliance office. In addition, the DHL Group Incident Reporting System can be reached by phone or through a web-based system: www.dhlcompliance.com. It is also available for our partners and third parties to report potential violations of this Statement.

All reported incidents will be treated as strictly confidential and, where necessary, anonymity will be assured consistent with applicable laws.

3.1 Anti-Retaliation

DHL Group prohibits any retaliation, either directly or indirectly, against Employees for reporting a violation of this Statement in good faith. If an Employee believes retaliation is occurring, the Employee is expected to inform the applicable Compliance office.

3.2 Consequences

DHL Group has zero tolerance for bribery and corruption. Violations of this Statement could result in criminal charges for Employees, as well as disciplinary consequences and claims for damages by DHL Group. Where a breach of legislation is suspected, we also reserve the right to refer the matter to the relevant authorities for further action.



4. CONTACT

The DHL Group Compliance Office is the owner of this Statement and can be contacted via gco@dhl.com.

DHL Group
Headquarters
DHL Group Compliance Office
53250 Bonn
Germany

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