

# Sanctions

Policy Statement



**DANX**  
**Carousel**

# DANX Carousel Group Sanctions Policy

## About the DANX Carousel Group

The DANX Carousel Group of companies (hereafter “The Group”, “We”, “Our”) is a time critical service logistics specialist with strong positions in the UK, Ireland, BeNeLux, DACH, Iberia, Nordics, Baltics and Poland.

The Group is the comprehensive partner for logistics and supply chain services such as time-critical spare parts distribution, warehousing, final mile, linehaul, battery logistics, customs clearance, and more. The Group consists of DANX, DANX ILS, UT, TBS, Fomab, TLS Group, Carousel, Alltrans, Logik International Logistics and LPR.

Our values encompass our commitment to Caring, Learning and Ownership and these are embedded in our everyday work.

### We support



## 10 principles of the UN GLOBAL COMPACT

### HUMAN RIGHTS

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses.

### LABOUR

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

### ENVIRONMENT

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

### ANTI-CORRUPTION

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

## International Labour Organisation

### ILO Declaration of Fundamental Principles and Rights at Work:

- (1) Freedom of association and the effective recognition of the right to collective bargaining;
- (2) The elimination of all forms of forced or compulsory labour;
- (3) The effective abolition of child labour; and
- (4) The elimination of discrimination in respect of employment and occupation.

## SUSTAINABLE DEVELOPMENT GOALS



Goal 3 - Good health and wellbeing



Goal 11 - Sustainable Cities and Communities



Goal 4 - Quality education



Goal 13 - Climate Action



Goal 5 - Gender equality



## **DANX Carousel Group Sanctions Policy**

### **Scope of Policy**

The scope of the **Sanctions** policy applies to all affected stakeholder groups including both upstream and downstream within the value chain, including management; employees; contract workers; suppliers and partners of all entities in the Group as well as for subsidiary companies owned and operated by the DANX Carousel Group across our geographies and countries and the wider communities in which it operates.

This content outlines the DanxCarousel Groups position on reporting and transparency in-line with national and international law, UN guidelines, governance, and regulatory requirements. The content of this policy outlines; how to report, Infringements and consequences of such breaches; our commitment to training, and awareness of its content and the Groups transparency of reporting and monitoring of this policy.

### **Our Commitment**

The DANX Carousel Group is committed to meeting its responsibility and to gain insights into its stakeholders with respect to The Sanctions Policy as defined by the UN Guiding Principles.

### **Aims of the Sanctions Policy**

The aim of this policy is to communicate – internally and externally – outlining its commitment to respect sanctions, in line with the objectives in the regulatory governance and UN Guiding Principles on business conduct and for which material impacts, risks or opportunities relate to, and to provide process awareness, guidance and training to all relevant stakeholders on appropriate behaviour when it comes to this policy. The DANX Carousel Group of companies is committed to open and unbiased dialogue with all our stakeholders on the Sanctions Policy.

The aim of this policy is to ensure that all business activities of the Group comply with international economic or financial sanctions (“International Sanctions”) and export control rules affecting the Group. As The Group does not own any products or cargo, then The Group can take no responsibility for enforcement or control of clients’ cargo.

## **DANX Carousel Group Sanctions Policy**

We expect our suppliers and contractors to share our regard and respect of this policy, and this is reflected in our Supplier Code of Conduct which can be found on our websites: <https://www.danxcarousel.com>, Nordics: <https://www.danx.com/> and for Western Europe: <https://www.carousel.eu/en/>

### **Clients**

Clients are responsible for providing their own sanctions diligence as the products they move are known to them. As a Group we can only work with the information provided to us by the client. As a carrier we are not aware of the origin of the goods and do not take any responsibility for the origin or licensing of moving the goods. This is outlined in our standard T&C's.

### **Suppliers**

The Groups suppliers for both services and some tangible purchases such as office materials etc... encourages suppliers to carry out trading in accordance with its Supplier Code of Conduct.

Non-compliance with International Sanctions and export control rules may expose the Group, our employees and others associated with the Group to substantial fines and losses and reputational risk and may have significant adverse effects on business relationships.

### **Monitoring Breaches**

The Group is committed to identifying potential and actual adverse impacts that this policy and our conduct of business may cause or contribute to, and strives to recognise and record through targets, to prevent such impacts, and mitigate or remedy using action plans.

### **Consequences of Breach and Infringements**

Whilst we appreciate that there may be some differences in applicable national laws versus international laws we apply our policies across all relevant stakeholders and we will adhere to the national and international laws as a minimum and respect the guiding principles of the UN Global compact and any other interested regulatory bodies that are applicable to the work that we carry out. If we receive any reported infringements, we will act appropriately for clarification and will take appropriate corrective actions.

The Group has the right (but not the obligation) to undertake checks on goods it will undertake as part of standard compliance auditing checks. If a client is found to be importing goods in contravention of the sanctions policy the goods will be held and the client informed.



## **DANX Carousel Group Sanctions Policy**

It is the client's responsibility to manage and liaise with the relevant authorities with regards to any sanctions or embargoes on their goods. Likewise, The Group has the right (but not the obligation) to undertake checks on their suppliers in line with our supplier code of conduct and supplier auditing process.

If we suspect that anyone working for or on behalf of the DANX Carousel Group has committed a breach of this policy, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken which may result in dismissal, or in the case of a supplier/partner action up to and including termination of contract. In some circumstances, under relevant law, the Group may be legally required to share details with such authorities, and we will comply with such requirements at all times.

The outlined topics within this policy are significant for the way we commit to and govern our conduct throughout our business.

### **Raising concerns**

Any employee with concerns may raise these through our employee mechanisms for raising workplace-related grievances. We encourage employees who have a concern to talk in the first instance to their line manager, or alternatively to raise their concern with their HR or compliance representatives. If none of these options is possible, the DANX Carousel Group's whistle blower system enables all stakeholders (internal and external) to speak up about violations in relation to this policy without fear of retaliation.

We will support all who report violations as well as those who request assistance or have concerns. If any concerns or illegal or unethical business behaviour is suspected or detected, you can report it to us via our whistle-blower system. Our whistle blower system Safe2Whistle can be accessed here:

<https://report.whistleb.com/en/danxcarouselgroup>. It is operated across the business by an independent third party (Danish law firm Bech Bruun) appointed by the DANX Carousel Group. All issues raised through the Whistle Blower system are monitored by the third party and the Group whistle blower team. Reporting is carried out confidentially, and stakeholders can choose to share their concerns anonymously.

### **Training, Communication, Awareness**

The Group is committed to raise awareness and knowledge of this policy amongst its' stakeholders, by providing specific awareness through training and communication on related matters within this policy.

## **DANX Carousel Group Sanctions Policy**

Training, communication, and awareness of policy is a fundamental requirement of our business. We advocate transparency of all policies and where appropriate training takes place either at point of Induction of employees, or as part of an annual commitment to ensure that policy is communicated and awareness refreshed effectively.

The Group makes this policy available to all employees on the intranet and can be found on the websites for external viewing. Where relevant The Group will share compliance procedures with employees and ensure they have read, understood, and agreed to comply with this policy.

### **Stakeholder Engagement**

We acknowledge our business is operated as part of an extended community of stakeholders, and as part of our regular dialogue with them we respect their view and expectations regarding this policy as outlined in the Supplier Code of Conduct.

### **Reporting and monitoring**

We communicate and report on our Sanctions Policy and related commitments of training and awareness as applicable to our stakeholders and as part of our annual reporting.

### **Culture of continuous improvement**

As part of our culture of continuous improvement we regularly evaluate against targets and review how we can best improve and strengthen our approach to addressing our policies supported through our values of Caring, Learning and Ownership.

### **Accountability for this policy**

Accountability for the implementation of this policy is overseen by the Groups Executive and Senior Leadership team, to ensure that our business clearly understands the responsibility to respect **The Sanctions Policy** and its day-to-day implementation to stakeholders.

### **Adoption of Policy**

The Danx Carousel Group Sanctions Policy statement is adopted by the Executive Leadership team of management on **1s January, 2025**.

#### **Review and revision of Policy**

This policy will be reviewed and revised annually for compliance to the policy content or as required if changes to legislation apply sooner.

#### **Contact**

If you have any questions relating to the content of this policy please direct them to [groupcompliance@danxcarousel.com](mailto:groupcompliance@danxcarousel.com)

**[DanxCarousel.com](https://www.DanxCarousel.com) | [Danx.com](https://www.Danx.com) | [Carousel.eu](https://www.Carousel.eu)**