

Code of Conduct T-Trex BV

Corporate social responsibility – partners and stakeholders

Vision and Mission

Our business philosophy, which is deeply rooted in our business principles, requires that we only work with partners and stakeholders who have the ability to consistently meet our standards and specifications and are committed to values of conduct that are compatible with our own.

Legal standards

This Code of Conduct sets forth the T-Trex BV guidelines and expectations with respect to key areas of responsible corporate behavior and ensures that T-Trex BV upholds the Principle of Mutuality and provides consistent excellence for our customers, partners and stakeholders. Content in this Code is informed by the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. This Code and our corporate social responsibility program more broadly applies to all our partners and stakeholders in all categories.

It is recognized that the circumstances in which our partners and stakeholders operate may change and because of this we review the Code every two years to ensure that its content and implementation remain appropriate and affective.

Legal scope

To ensure up-to-date legal knowledge T-Trex BV operates an internal education plan. Furthermore T-Trex BV is member of TLN / Fenex, the Dutch Transportation Association which offers their members legal assistance upon request. T-Trex BV management and employees recognize that the knowledge of legislation is a continuous process which is an important factor in daily operations. Structural legal changes are implemented in the internal processes immediately after implementation to ensure up-to-date legal knowledge and practice.

Operational scope

T-Trex BV performs its on-route activities with a haulier based on an exclusive agreement set up by the legal department of TLN / Fenex. This guarantees the respectance of and the constant monitoring of relevant legislation. The agreement also enholds the right to audit with an addition of annual reporting of the key elements. Finally on-site driver and truck/trailer audits at T-Trex BV premises in Venlo, the Netherlands are part of the agreement.

T-Trex BV tries to limit the execution of secondary subcontracting. In the rare case when secondary subcontracting is being executed the external party is being audited on key elements (read: CMR insurance, competence, international minimum wage legislation, etc) prior to closing the agreement. Furthermore the internal T-Trex BV quality management system ensures the continuous monitoring of external parties including adequate and consequential action in case needed.

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Child Labor

Requirements

T-Trex BV commits itself to not employ individuals below the age of 16 with registration documentation of each individual's date of birth or legitimate means of confirming each individual's age.

Guidelines

- T-Trex BV complies with the laws and regulations related to the minimum working age. No employee of any age, including apprentices or vocational students, may be employed in breach of local regulations governing the minimum wage for work or the compulsory age of schooling, consistent with ILO Minimum Age Convention No. 138.
- T-Trex BV ensures that workers under 18 are not allowed to;
 - Work in hazardous conditions or those that require handling hazardous materials in an unsafe manner.
 - Work for more than 8 hours per day.
 - Work primarily at night.
 - Work in a manner that unreasonably interferes with vocational education.
- Where independent documents are not available, T-Trex BV employs other legitimate and reliable means for determining employees' ages.

The above mentioned statement about child labor is also a part of the exclusive haulier agreement and is also guaranteed via the secondary conditions of the T-Trex BV subcontracting agreement.

Voluntary employment / Forced Labor

Requirements

T-Trex BV employs all employees on a voluntary basis and does not use any prison, slave, bonded, forced or indentured labor, or engage in any other forms of compulsory labor, or any other forms of slavery or human trafficking.

Guidelines

- T-Trex BV does not require employees to deposit original identification documents, travel documents, or any other personal legal documents upon commencing employment with T-Trex BV.
- Supplier ensures that throughout the hiring process and employment period no deposits (monetary or otherwise) are collected from employees, including temporary, seasonal and migrant labor and employees provided by agencies, recruiters or brokers. Employment through private employment agencies shall comply with ILO Private Employment Agencies Convention Nr. 181. In cases where a fee was collected in violation of this guideline T-Trex BV shall promptly pass, as appropriate, all such fees either directly to labor contractors/agencies or other providers of labor, or promptly reimburse the affected worker.
- T-Trex BV does not force employees to work overtime.

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- T-Trex BV will not delay or withhold the payment of workers' salaries for more than one month on a regular basis.
- T-Trex BV does not confine or subject employees to restrictions on freedom of movement.
- T-Trex BV does not use or source raw materials or products associated with forced labour or human trafficking.
- T-Trex BV will only use legitimate and reputable recruitment agencies which are properly licensed to operate under applicable law.

Migrant labor

Requirements

- T-Trex BV recognizes the unique legal, social and cultural situations that migrant workers face and will ensure that such workers are treated with dignity, respect and in accordance with the same standards as apply to other workers.

Guidelines

- T-Trex BV provides working conditions (wages, hours of work, etc) to migrant workers which are lawful and comparable to those other workers performing substantially the same tasks. T-Trex BV will verify the legal status of all migrant workers and ensure that only those with a valid work permit issued by the appropriate governmental authority are employed.
- Supplier will not hold official identity documents, including passports, work permits, and birth certificates even upon the request of the migrant worker.
- T-Trex BV will pay all fees related to services provided by third party labor contractors or labor agencies.

Abuse, harassment, disciplinary action

Requirements

- T-Trex BV does not engage in physical, mental, verbal, sexual or any other abuse, inhumane or degrading treatment, corporal punishment or any form of harassment. T-Trex BV treats all employees with respect and dignity and complies with local legislation on disciplinary practices.

Guidelines

- T-Trex BV maintains formal written disciplinary procedure and these procedures must be clearly communicated to all employees and prospective employees. All disciplinary measures must be recorded and the employee(s) affected by disciplinary action must acknowledge the action in writing.
- T-Trex BV will not establish monetary fines and/or take deductions from wages for disciplinary reasons.

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- T-Trex BV will establish written and/or verbal procedures for handling grievances from workers concerning workplace conditions and treatment.
- T-Trex BV conducts security procedures in a gender-appropriate and non-intrusive manner, if applicable.

Fair and equal treatment / discrimination

Requirements

- T-Trex BV's terms and conditions of employment, including hiring, training, working conditions, compensation, benefits, promotions, discipline, termination or retirement are based on the individual's qualifications, performance, skills and experience.

Guidelines

- T-Trex BV maintains workplaces that are free from discrimination on the basis of race, color, age, sex, gender or gender identity, caste, political opinion, natural origin, religion, marital status, sexual orientation, disability or genetic information, maternity, membership, affiliation or other status of the individual unrelated to the ability to perform the job.
- T-Trex BV does not conduct medical tests on employees that can be used to discriminate (e.g. pregnancy testing). The results of any tests that are required by local legislation shall not be used in a discriminatory way.

Compensation and benefits

Requirements

- T-Trex BV fairly compensates all employees by providing wages and benefits in accordance with all applicable laws.

Guidelines

- T-Trex BV ensures that wages paid for all hours worked meet at least the legal minimum wage or the local industry minimum standards for compensation, whichever is higher.
- T-Trex BV pays employees on time, in accordance with legal requirements; in all circumstances, wages must be paid on at least a monthly basis.
- T-Trex BV ensures that, where workers' pay is contingent on the volume produced workers always earn at least the equivalent of the applicable minimum wage for each 8-hour day and are not compelled to work more than 8 hours per day in order to earn the minimum wage. Where there is no legally mandated minimum wage T-Trex BV ensures that workers earn at least the average wage in the particular industry or geographic area.
- T-Trex BV meets all legal requirements for the payment of overtime and incentive rates. T-Trex BV pays overtime at a premium rate / at a rate at least equal to the normal rate of compensation.

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- T-Trex BV provides all legally mandated benefits, such as public holidays, paid vacation / annual leave, sick days and maternity / paternity / family leave.
- T-Trex BV, where reasonably possible, must provide all workers (permanent, temporary, seasonal, domestic or migrant) with a written contract in the appropriate language that includes a description of job duties, benefits, disciplinary procedures, and notice periods. Where the provision of a written contract is not reasonably possible or practical, T-Trex BV shall provide workers with a verbal description of the terms of their employment.
- T-Trex BV provides each employee with an itemized wage statement upon wage payment. The statement includes, at a minimum, amount of pay, pay period, rate of pay, regular and overtime hours worked, deductions and benefits, if applicable.

Working hours

Requirements

- T-Trex BV complies with all applicable laws regarding regular working hours, rest periods and overtime hours.

Guidelines

- T-Trex BV must provide workers with at least 24 hours consecutive hours of rest during every 7 day period.
- T-Trex BV does not require a work week of over 60 hours, including overtime, unless operational circumstances require a temporary increase in working hours. T-Trex BV consults with employees about the temporary increase in working hours and provides compensatory time off for these additional hours or overtime compensation at a premium rate.
- T-Trex BV does not force employees to work overtime and employees will not be punished, penalized or dismissed for refusing to work overtime.

Freedom of association / collective bargaining

Requirements

- T-Trex BV respects the right of employees to form and join trade unions and bargain collectively in a lawful and peaceful manner, subject to and in accordance with applicable law.

Guidelines

- T-Trex BV complies with all applicable laws that pertain to freedom of association and collective bargaining.
- T-Trex BV does not discriminate on the basis of affiliation or non-affiliation.

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- T-Trex BV does not allow interference by management in the organization of workers. T-Trex BV does not subject its employees to harassment, intimidation, or retaliation in their efforts to freely associate or bargain collectively.
- T-Trex BV provides confidential and anonymous means for employees to raise grievances and records this process.

Health and safety

Requirements

- T-Trex BV complies with all applicable laws pertaining to health and safety in the workplace.

Guidelines

- T-Trex BV provides a safe, clean, healthy and productive work environment, including the provision of clean drinking water to all workers and an adequate number of washing and toilet facilities for both males and females.
- T-Trex BV or a third party agency that provides worker dormitories shall provide workers with adequate lightning, temperature, ventilation, toilet facilities, shower or bathing facilities and access to clean drinking water. Dormitories shall be clean and safe and provide emergency exits, reasonable personal space and reasonable entry and exit privileges.
- T-Trex BV shall provide workers written health and safety information and warnings, in the primary language(s) of its workers, Material Safety Data Sheets that describe toxic or hazardous substances used in the workplace and properly manage the handling of all dangerous substances and machinery.
- T-Trex BV shall provide all appropriate personal protection equipment.
- T-Trex BV adequately trains employees on applicable local workplace safety practices, including emergency evacuation procedures. T-Trex BV provides systems and training designed to help prevent accidents and injuries.
- T-Trex BV maintains records of health and safety training and accidents and injuries at the workplace.
- T-Trex BV shall establish and maintain appropriate first aid equipment at the facility and make it available to workers at all times. The location of the equipment shall be prominently marked and communicated to workers.
- T-Trex BV provides adequate access to medical facilities, fire exits and fire-fighting and safety equipment.

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Environment

Requirements

- T-Trex BV complies with all applicable environmental laws and regulations. T-Trex BV continuously strives to improve environmental performance.

Guidelines

- T-Trex BV documents and maintains records of compliance with local and national environmental laws and regulations, including permits and reporting requirements.
- T-Trex BV properly handles and stores hazardous materials and waste, has a plan for dealing with discharges of hazardous wastes and disposes of them in a safe and legal manner.
- T-Trex BV ensures that relevant staff have been adequately informed about the company's significant environmental impacts .
- T-Trex BV minimizes and monitors its impact on the environment where possible through a reduction of CO2 and gas emissions, energy efficiency initiatives, reduction and recycling of natural resources, including water and paper / packaging materials.

Ethical business practices

Requirements

- T-Trex BV conducts its business in accordance with the highest standards of ethical behavior and in accordance with all applicable laws and regulations.

Guidelines

- T-Trex BV complies with all applicable legal requirements, whether local or foreign, that apply to foreign operations, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. The Foreign Corrupt Practices Act generally makes it unlawful to give anything of value to government officials, foreign political parties, party officials or candidates for public office for the purposes of obtaining or retaining business or gaining an improper advantage.
- T-Trex BV trains its employees, consultants, subcontractors and vendors on the company's rules and procedures related to ethical business practices.
- T-Trex BV does not offer or accept bribes, kickbacks or other means of obtaining undue or improper advantage.
- T-Trex BV does not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of fair competition laws or antitrust laws that govern the jurisdictions in which it conducts business.
- T-Trex BV respects the intellectual property rights of others. T-Trex BV takes appropriate steps to safeguard and maintain confidential and proprietary information of third parties and uses such information only for the purpose authorized by these third parties.

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Compliance

Requirements

- T-Trex BV complies with the legal requirements and standards of its industry under all applicable laws and maintains accurate books and records demonstrating compliance with such laws and these standards to the extent permitted by law.

Other responsibilities

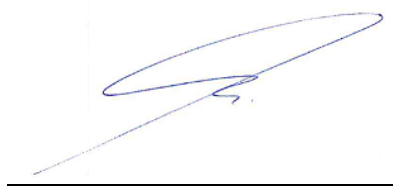
Communication of this Code of Conduct

- T-Trex BV will inform workers about the expectations contained in this Code. This might include prominently posting the Code in the workplace in an area accessible to workers, conducting group or individual meetings to review and explain the Code, distributing explanatory pamphlets to workers, or communicating through on-line channels.

Assignment of responsibility

- T-Trex BV assigns a senior offices to continuously monitor compliance by T-Trex BV with this Code. T-Trex BV informs third parties involved in an individual case in case of any violations of this Code, including is T-Trex BV so chooses of violations reported via a confidential whistleblowing hotline. Such programs shall protect worker whistleblower confidentiality and prohibit retaliation.

This Code is aligned upon, upheld and put into action by the Quality Assurance Manager as indicated by the signature included with this document.



T-Trex BV
Tom Jeurissen
Quality Assurance Manager

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