



POLYTRA GROUP Code of Conduct

**OUR JOB IS ABOUT PASSION,
COMMITMENT, RESPONSIBILITY AND TRUST**



CORE VALUES

PASSION



TRUST

COMMITMENT

RESPONSIBILITY

MISSION STATEMENT

- ✓ POLYTRA aims to be a long term logistics partner sustaining its clients in their growth by combining **personalized** dedicated services, **experience** and **expertise**.



About the Code of Conduct

This Code of Conduct is binding for all employees of the POLYTRA Group worldwide. While it is not intended to describe every law and internal policy that may apply to you, it defines basic, globally applicable standards of conduct and what is expected from you. Please make sure that you understand the standards of the Code of Conduct as well as the respective local laws and corporate guidelines, and always abide by them and attend all mandatory and necessary training sessions. Managers are responsible for supporting their employees in this endeavor.

Violations of the law by just one employee can seriously harm our company's reputation and inflict considerable damage, including financial damage. Our company does not tolerate these violations and will not protect those responsible for sanctions imposed by the authorities. Violation of laws, international standards and internal rules may result in disciplinary action, including termination of employment, and may be subject to civil or criminal action.

In almost all cases, breaches of the law can be avoided by timely advice. If you have doubts about the legal or ethical implications of your own conduct or questions about what is required, you are requested to seek advice or assistance from your manager, the relevant department (e.g. human resources, legal or finance department) or the Compliance Officer. You must also report any suspected or actual violation of law or company policy. In such cases, you may also use the Compliance Hotline.

The contact details for your respective Compliance Hotline can be found on the POLYTRA Intranet under compliance.

You will find more details regarding POLYTRA's Compliance Program on the POLYTRA Intranet under compliance.

For this purpose, confidential Compliance Reporting lines have been established in all regions of the world. Messages can also be left anonymously. These cases will be thoroughly investigated and handled as confidentially as possible. POLYTRA strictly prohibits retaliation against any person who uses the Compliance Reporting in good faith.



Human Rights, Labor, and Social Standards

POLYTRA seeks to ensure that the conduct of all POLYTRA employees is consistent with internationally agreed-upon standards of human rights as well as core labor and social standards. These standards include the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labor Organisation (ILO) Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.

POLYTRA is particularly committed to the abolition of all forms of child and forced labor, the principle of non-discrimination, the recognition of the freedom to associate, collective bargaining and social partnership, fair compensation and benefits based on local market conditions, entitlement to adequate working hours and paid leave as well as maintaining proportionality in disciplinary measures and security.

POLYTRA is firmly committed to equal employment opportunities and to compliance with all applicable laws that particularly prohibit employment discrimination on the basis of age, race, color, sex, sexual orientation, gender identity or expression, national origin, religion or disability. This policy applies to all employment decisions, including recruiting, hiring, training, job rotations, promotions, pay practices, benefits, disciplinary actions and terminations. POLYTRA also strictly prohibits sexual harassment and other workplace harassment. POLYTRA promotes a diverse and inclusive workplace where all employees must treat each other with respect and dignity.



Protection of Environment, Health, and Safety

- **At POLYTRA, we drive sustainable solutions and take on economic, ecological and social responsibility. We never compromise on safety. Economic considerations do not take priority over safety, health and environmental protection.**

- Compliance with all legislation to protect humans and the environment is one of our basic tenets. This applies to our products as well as to our processes.

- You are required to deal responsibly with natural resources and to protect the environment in your area of work. Likewise, the health and safety of all humans is of utmost importance to POLYTRA. According to the principle of Responsible Care, we act responsibly to protect and preserve our employees', neighbors' and business partners' health. Each employee is responsible for working safely at all times and must comply with all applicable environmental and occupational health and safety laws and regulations, as well as with the corresponding corporate policies and rules. All managers have the duty to instruct, supervise and support their team in living up to this responsibility. In areas where no express regulations or corporate policies and rules exist for environmental protection and occupational health and safety, you must make your own decisions based on common sense, in consultation with your manager where necessary.

- Air, water and land may be used for industrial purposes only within the framework of approvals granted by the relevant authorities. The same applies when erecting and operating or modifying and extending production plants. Every unauthorized release of substances must be avoided.

- Waste must be disposed of in accordance with legal requirements. If the services of third parties are used for this purpose, it must be ensured that they, too, comply with environmental regulations and our corporate standards.

- POLYTRA strives to improve procedures and processes to further minimize our environmental impact and prevent health risks. However, if incidents occur, the relevant corporate units must be immediately and comprehensively informed. The goal is to initiate the appropriate emergency response and damage repair measures as promptly and as precisely as possible. Furthermore, these units must immediately communicate with governmental authorities and provide the information required by law.

- Employees who report such incidents in good faith need not fear any retaliation. On the contrary, omitted, delayed or incomplete reports are not in the company's interest.



Antitrust Laws

Our policy is to promote fair competition. We therefore require all employees to strictly abide by all applicable antitrust laws.

Violations are subject to severe sanctions and fines and may lead to the invalidity of the affected agreement.

Agreements between competitors

Agreements and concerted practices between competitors (“horizontal agreements”) are prohibited if their objective or effect is to prevent or restrict competition.

These comprise, for example, agreements on prices, collusion on tender bids, allocation of customers, terms of sale or procurement, production or sales quotas, or carving up geographical markets.

Not only agreements, i.e., express contractual arrangements, but also concerted action resulting from a sequence of unilateral declarations are prohibited.

Any direct or indirect exchange of information between competitors (which can include non-exclusive distributors) is prohibited, such as information on customers, pricing, costs, salaries, terms of sale, methods of distribution, market shares, production volumes, bidding or strategies (business and research strategies, for example).

In the course of contact with competitors, you must always ensure that no information is accepted or given which permits any conclusions regarding the present or future market conduct of the information-providing party.

In case of horizontal agreements, the strict regulations of the European antitrust law must be complied with worldwide, irrespective of local laws that may be less strict or non-existent.

Vertical Agreements

Many types of vertical agreements, i.e., arrangements and agreements between suppliers and customers are forbidden in the E.U., the United States and other countries, and may lead to the imposition of fines or the invalidity of the respective agreements.

In many cases, the permissibility and, as a result, effectiveness of a restraint will depend on the duration and intensity as well as the market position of those involved.

In case of doubt in connection with antitrust laws or the permissibility of a certain behavior under such laws, you are requested to consult your manager or the legal department at an early stage.



Corruption

All our business partners, in particular our suppliers, customers, joint venture partners, contractors and distributors, must be dealt with fairly. POLYTRA expects the same from its business partners. Our relations with all business partners shall be based solely on objective criteria, in particular quality, reliability, competitive prices, as well as compliance with environmental, social and corporate governance standards. Anti-bribery laws in most countries of the world prohibit bribes to domestic and foreign governmental officials and employees and representatives of domestic and foreign companies in the private sector.

POLYTRA is strictly committed to fighting any kind of corruption. Therefore, POLYTRA prohibits its employees, agents, and other third parties acting on POLYTRA's behalf from engaging in any form of bribery. While dealing with business partners or government officials, they must never demand or accept anything of value (e.g. cash, gifts, entertainment or any other personal benefits) which could be construed as an attempt to influence or induce business decisions. Likewise, employees of other companies or government officials must never be promised or granted any personal benefits with the intent to obtain or retain business or to gain any improper advantage for POLYTRA.

We require all employees to inform their manager if a business partner or governmental official offers or demands any personal benefits.

Furthermore, “facilitation” or “grease” payments (i.e., small cash or non-cash benefits to office holders to facilitate administrative procedures or official acts, to which the company or the individual is entitled) are not allowed. If, however, the refusal to make facilitation payments would put your personal safety at risk, you may make such a payment but must inform your manager thereafter.



Gifts and Entertainment

Gifts and invitations in business are generally handled much more restrictively today than some years ago. We explicitly welcome and support this development.

Consequently, gifts, business meals or entertainment are to be given or accepted only if intended or understood as simple business courtesies which are consistent with customary business practices and which from the outset rule out any influence on a business decision or an official decree. This also applies to gifts, meals or entertainment given or accepted in the course of professional business events or conferences.

If inappropriate gifts cannot be tactfully refused, they should be accepted. In that case, the manager must be informed thereof and shall decide on the further treatment (e.g., a donation to charity).

Offering, granting, demanding or accepting cash or cash equivalents is never appropriate.

In most countries, gifts and invitations of a certain value are considered taxable benefits. You must make sure that the applicable tax law is strictly adhered to. If in doubt, you are required to consult your manager or the tax department.

Specific gift policies – in due consideration of the principles above – may exist in your country or unit (e.g., procurement).
In case of doubt, you are requested to consult your Compliance Officer or the legal department.

Only accept gifts, business meals or entertainment if they are understood to be simple business courtesies.



Conflicts of Interest

You are expected to act in the best interests of our company and to safeguard its reputation by avoiding conflicts of interest. Personal relationships or interests must not affect business activities. This means that you must not create or maintain personal interests, which may pose, or appear to pose, a conflict with the interests of POLYTRA or which might influence, or appear to influence, your judgment in the performance of your duties.

You should, for example, avoid any investment, interest, association, or activity that may cause others to doubt your fairness, integrity or ability to perform your duties objectively.

Each employee must inform his manager of any existing or potential conflict of interest and seek a solution together with the manager to avoid, or at least minimize, the conflict of interest.



Information Protection and Insider Trading Laws

Any non-public information about POLYTRA or its clients / partners that, if disclosed, would be detrimental to the company, or would give someone an unfair business or personal advantage, is confidential property of the company. You must always keep confidential information secret and protected against unauthorized access by third parties. You must also not exploit your knowledge of such information for your personal gain or the benefit of a third party. This also applies to confidential information disclosed to you by third parties.

You must comply with applicable policies and guidelines, e.g., the minimum requirements of information protection and the guidelines on the use of intranet, internet as well as external social media. If you are unsure what constitutes proprietary information, you should consult your manager, the competent information protection officer or the legal department.

As an employee, you may have access to material, non-public information about POLYTRA or the affairs of a third party which, if disclosed, could impact the value of publicly-traded securities.

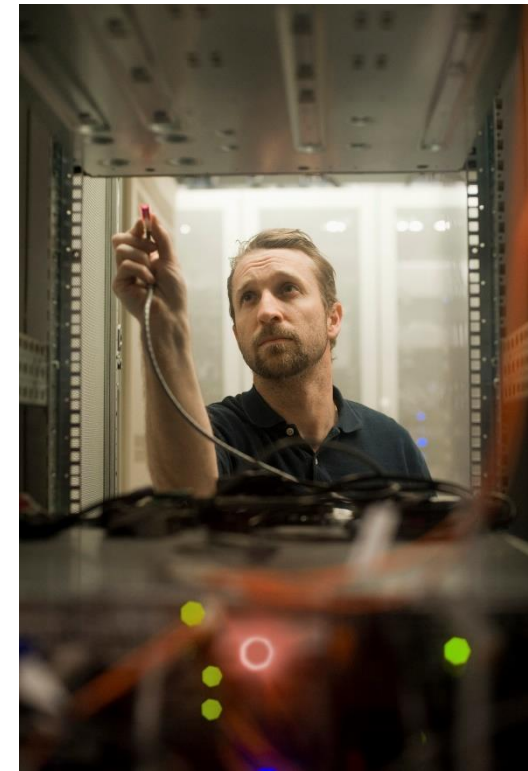


Protection of Data Privacy

POLYTRA is committed to respecting the privacy and integrity of its employees and its business partners. We adhere to strict standards when processing our employees' personal information and our business partners' data. All personal data collected and held by POLYTRA will be processed fairly, transparently, carefully and in compliance with the locally applicable data privacy laws.

Access to personnel records is restricted to POLYTRA employees and agents who have appropriate authorization and a business need for that information. Confidential employee information shall not be disclosed to anyone outside the company without proper authorization or unless required by law.

In case of any doubt, you must consult the Data Protection Officer or the legal department.



Imports and Exports

Various national and international trade laws restrict or prohibit the import and export of products. These restrictions are based not only on the nature of the product, but also on the country of origin or destination and, sometimes, even on the identity of the customer (embargo). Similar restrictions may apply to the export of technology and software. Country-specific embargoes are in place for certain countries.

No person or company subject to the jurisdiction imposing an embargo may participate or assist in the import or export of goods or services from or to a country, its citizens or residents subject to an embargo.

In addition, the provisions of the Chemical Weapons Convention and the laws and international conventions regulating trafficking and dealing in narcotics, psychotropic substances or addictive

substances are particularly important to our company. Therefore, none of our employees must buy, produce or sell chemicals or other substances if this violates these regulations. Without an express permit from the relevant authorities and the voluntary declaration of final destination required by POLYTRA for certain products, no substance or technology subject to legal control or voluntary self-monitoring by POLYTRA may be exported or sold. Where required by law, products must be kept under lock and key.



Protection of Company Property and Property of Business Partners

You are required to handle company property in a responsible manner and to protect POLYTRA assets against loss, damage, theft, abuse and unauthorized use.

Company property also includes intangible assets such as proprietary knowledge, intellectual property rights and copyrighted material.

Company computers and other equipment are furnished for work, not for personal use. Accordingly, you should only load software onto them that has been properly licensed.

Without the express consent of the relevant unit, company property may not be used for private purposes or removed from the company's premises.

All employees must comply with the relevant corporate policies covering the protection of company property.



Money Laundering

Money laundering means the introduction of assets (not only cash) originating from criminal offences into the regular financial and economic cycle. Money laundering is a criminal offence in the Member States of the E.U., the United States, China and various other countries.

No employee, either alone or in collaboration with third parties, may take measures that violate applicable regulations on money laundering.

Where questionable financial transactions involving transfers of cash or cash equivalents are requested, prior review by and approval from your treasurer is required.





ICT

Emergency procedures

- ICT emergency procedure covering human errors, destruction of servers, network breakdown, electricity breakdown, fire, attack, hardware error, environmental causes, nuclear disasters, hacking
- Depending on the severity, appropriate action plans (depending on availability of phone lines, servers, electricity)

Disaster Recovery Plan

- In case of power failure – outage – failure of servers – hacking - viruses – integrity of data

Remote access

- Citrix

Site safety

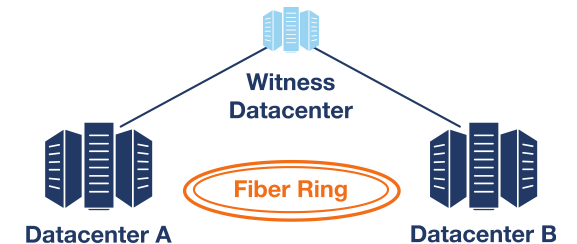
- Storage, server & backup replication for disaster recovery with minimal downtime
- Witness datacenter in third site: management, monitoring and datacenter lover control

Data storage

- Redundant datacenters
- Failover capacity to run all business critical services in one datacenter
- WAN connectivity: BGP failover
- Carrier-neutral

DRP

- Emergency protocols
- Back-up solutions
- Recovery protocols
- Communicaton protocols





Staffing

In the event of **staff absence** raising a concern regarding requirements & maintaining business continuity, the **following procedure** will be applied:

Direct contact with staff to gain cover - back-up & competence matrix to reorganise – verify staff presence on other departments – cancel or reschedule appointments

- **Staff back-up**
Back-ups in each department to ensure continuity in case of absence/illness
- **Epidemics – incidents major involvement**
Cascade recall procedure
Restriction on joint travelling
Designation of facility emergency coordinators
- **Competence management**
Competence matrix in place to monitor required knowledge & experience
Comprehensive range of training modules
- **Emergency Staffing Team**
Emergency preparedness reviewed by Management – evaluate & monitor needs and resources
Pre-determined and designated team (staff levels appointed)
- **Interim management**
Internal readiness or Close cooperation with Interim & Recruitment Offices to find solutions on short/long term



Processes

Within the **Quality Management System**, following **precautions** are in place:

- **Process Descriptions**
Process flows by Business Units: Input – Actions - Output – Responsibles – Information accessibility
- **SOPs**
Detailed Standard Operating Procedures for all key accounts
- **TRIS software (under update in Africa)**
Model files created in TRIS environment, customized with customer specific requirements – routes – products
- **Procedures**
Detailed emergency response procedures
Evacuation plan
Methods and schedules for exercising emergency response plan
- **Competence matrix**
Overview of competences within a department/BU
- **Service Level Agreements**
Contractual demands of 3rd parties
- **KPIs**
Availability of “life” performance indicators to elaborate corrective & preventive measures





Occupational health - Locations

The **emergency response plan** is **covering** following items:

- Fire
- Incident – accidents
- Dangerous Goods
- Physical aggression – raid
- Emergency issues on displacement
- Evacuation
- Bomb Threats
- Theft
- Burglary
- Chemical – Food – Feed – Safety
- Nuclear incidents

and also **includes**:

- Specific emergency procedures per scenario
- Administration protocol (administrative requirements)
- Communication protocol (internal & external)
- First Aid program and training
- Testing & evaluation of the emergency plan





Risk inventory & methods

RAM (Risk Assessment Matrix) for the **qualitative assessments of Risks** and where appropriate for **prioritisation of activities and resources**.

Build up following the **Fine & Kinney Method**.

3 parameters are defined:

- Probability that the event will happen
- Frequency of exposure
- Severity of consequences.

Following **Risk items** are defined (as per following slides) :

- Safety & Security
- People & Competences
- Occupational Health & Environment
- Finances
- Customers & Suppliers
- Management of Change
- Operations & Data Security

Risk monitoring

RAM is **reviewed** at least yearly and in case of:

- New customers – products – destinations
 - New activities
 - ICT updates & changes
 - Opening new offices
 - Law & Legislation
 - Implementation of standards
 - Major incidents
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- Risk assessment is monitored by the **HSEQ Manager**, consulting the various departments – BUs
 - RAM performed per country



POLYTRA

**BETWEEN A AND B,
THERE'S ALWAYS AN X**

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