



Supplier Code of Conduct

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DP WORLD

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General information

Objective

This supplier code of conduct (henceforth “Code”) underscores our voluntary commitment to maintain national and supranational standards. This includes, but is not limited to, labour standards, social standards, the ten principles of the Global Compact, the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the core labour standards of the International Labour Organization (ILO), the ILO Tripartite Declaration of Principles on Multinational Enterprises and Social Policy (MNE Declaration), the OECD Guidelines for Multinational Enterprises, and the Responsible Care® Global Charter.

Scope

The Code defines our expectations of our suppliers and their employees, various official bodies, own suppliers and sub-contractors. The suppliers are required to pass on all sustainability requirements to their own suppliers and to ensure to the extent possible and reasonable, that the sustainability requirements are passed in the supply chain.

Compliance

Imperial expects its suppliers to take individual responsibility for strictly adhering to all relevant national and supranational laws and regulations as well as the specifications laid out in the Code. Imperial reserves the right to monitor adherence to the Code using internal or external audits. When doing so, Imperial will provide reasonable advance notice.

Acknowledgement

By signing a supplier or service provider contract with Imperial, the supplier acknowledges this supplier Code.

Treatment of employees

Imperial attaches particular importance to respect for human rights and good working conditions, both within our own Group companies and among our suppliers and business partners. We are committed to respecting internationally recognized human rights and oppose any exploitative working conditions.

We expect our suppliers¹ to act in accordance with the core labour standards of the International Labour Organization (ILO)².

In doing so, please pay close attention to the following points:

Child labour

Imperial³ will have nothing to do with child labour anywhere in its supply chain. We therefore expect our suppliers to prohibit child labour in their own organisations as well as in the organisations of their sub-suppliers.

Modern slavery, human trafficking and unethical recruitment

Suppliers must take appropriate and adequate measures to eliminate debt bondage, forced and compulsory labour, as well as all forms of modern slavery and human trafficking within their own area of responsibility and/or along the supply chain. Suppliers ensure that employment relationships are voluntary and allow employees to give notice of their own volition in observance of a reasonable notice period. Employees of suppliers are given a contract at the time of hiring that complies with applicable law and is in a sufficiently documented form (e.g. written or electronic), is written in a language they understand and in which their rights and obligations are truthfully and clearly set out.

¹ "Supplier" means all Imperial suppliers and service providers as well as any companies associated with them

² <http://www.ilo.org>

³ "Imperial" means Imperial Logistics International B.V. & Co. KG as well as Imperial Mobility International B.V. and all of their subsidiaries

Equal opportunities and protection against discrimination

Imperial is committed to maintaining equal opportunities among employees and to creating a culture that is free from all forms of discrimination and harassment. No employee, business partner or customer shall be discriminated against on the basis of gender, race, color, national origin, religion, age, disability, union or political affiliation, sexual orientation or marital status. Imperial expects the same from its suppliers.

Freedom of association and collective bargaining

We expect our suppliers to support the rights of workers to freely associate and to engage in collective bargaining.

Fair treatment

We expect our suppliers to treat their workers fairly. Any kind of sexual harassment, physical attack, coercion or harassment in the workplace is strictly prohibited.

Appropriate remuneration for work performance

Suppliers comply with international standards, such as the principle of equal remuneration for work of equal value regardless of gender and fair favorable working conditions. Suppliers ensure that workers and employees are paid at least equal to the minimum wage established under applicable local law. The wage paid shall be sufficient to cover the basic needs of the employees. The cost of living and social security benefits in the country concerned are taken into account. All employees must receive at least the social security benefits prescribed by law. Overtime must be compensated with statutory or industry-standard supplements. We expect our suppliers to pay their employees promptly.

Working time

Suppliers are expected to comply with local laws and industry standards on working hours. Suppliers ensure that safe and healthy working conditions prevail and that work breaks and regular paid vacations are guaranteed.

Minorities, vulnerable groups and indigenous people

Suppliers respect the right of minorities, vulnerable groups and local communities to decent living conditions.

Use of security forces

Suppliers ensure that the commissioning or deployment of security forces does not lead to violations of human rights. Suppliers ensure not to contribute directly or indirectly to supporting private or public security forces that unlawfully exercise control over mining sites, transportation routes and upstream stakeholders in the supply chain.

Behaviour in competition

Imperial expects its suppliers to act fairly in regard to competition and to conduct their business in accordance with competition law.

The following principles are particularly relevant in this regard:

Anti-corruption and unfair competition

Imperial expects its suppliers not to make or accept bribes. Furthermore, suppliers are prohibited from offering Imperial employees any unusual gifts or financial contributions. Our suppliers only make contributions, invitations, donations or sponsorships within the legally permissible scope.

Antitrust law

Suppliers are required to ensure that they act in accordance with antitrust law.

Furthermore, suppliers are required to distance themselves from any illegal behaviour of any kind likely to lead to distortion or reduction of competition.

Specifically, suppliers should refrain from the following practices in relation to competitors:

- Agreeing / fixing prices or price components
- Agreeing to refrain from competition or the placing of fictitious bids
- Agreements relating to dividing up markets or customers
- The exchange of confidential market information (e.g. revenues, prices, price calculations, planned investment, strategies or customer data)
- Unfair discrimination against customers or competitors

Money laundering and breaches of import / export bans

Imperial does not tolerate money laundering or breaches of import / export bans. We therefore expect our suppliers to act in strict accordance with money laundering laws and any existing import / export bans.

Anti-terrorism financing

Imperial expects suppliers to avoid any contact with or support of any terrorist organisations. If necessary, suppliers must use internal measures to actively prevent the financing of terrorism.

Transportation of dangerous goods

When dealing with dangerous goods, Imperial expects suppliers to secure⁴ them in accordance with the relevant regulations. In complying with the relevant portions of the Security Screening Act, inter alia, suppliers should only use

⁴ By "secure" we mean taking measures or precautions designed to minimise the chances of theft or misuse of dangerous goods which could cause damage to people, cargo or the environment.

reliable, properly trained personnel who have been screened in accordance with anti-terror regulations.

Protection of confidential information

Suppliers are expected to protect the confidential information of all business partners and to only use it within the parameters agreed in the relevant contract.

Intellectual property rights and plagiarism

Our suppliers are expected to respect the intellectual property rights of third parties. Copyrights, patents, trademarks, licenses, logos and trademarks of third parties must be protected. It must be ensured that no plagiarism is used by any partner.

Environment and security

Our suppliers are expected to take appropriate measures to ensure the efficient use of energy, water and raw materials, the use of renewable resources and the minimization of environmental and health impacts.

Harm to land, water, air

Suppliers ensure that they do not cause harmful soil modification, water pollution, air pollution, harmful noise emission or excessive water consumption, which may lead to significant impairment of the natural foundations for food and drinking water or the health of a person.

Furthermore, Imperial expects a constant reduction of energy consumption and emissions by using the latest technologies to minimize the environmental impacts.

Water

Supplier take appropriate and adequate measures to minimize water consumption at their sites and/or along their own supply chains.

Biodiversity

Suppliers are required to ensure the protection of the natural ecosystem, especially endangered wildlife habitats, and the sustainable use of natural resources.

Circular economy and waste management

Suppliers take reasonable and appropriate measures to prevent waste, reuse and recycle resources, and dispose of residual waste, chemicals and wastewater in a safe and environmentally sound manner.

Forced eviction

Suppliers comply with the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition phase, development or other use of land, forests and waters.

Health & safety at work and accident prevention

We expect our suppliers to follow all relevant health & safety legislation and operating guidelines. We expect them to protect the health of their employees and actively try to prevent all work-related accidents and illness. We expect our suppliers to ensure the highest possible safety standards when it comes to checking work premises, plants, machines, equipment and procedures.

Emergency management

Imperial expects suppliers to implement an emergency management plan, which covers first aid procedures, reporting and evacuation procedures, emergency training and drills, as well as adequate fire safety equipment and fire detection / alarm systems.

Compliance of sustainability requirements by suppliers

Imperial expects suppliers to maintain the principles outlined within this Code and views any transgression as a fundamental breach of contract.

In the event of a violation of the sustainability requirements by the supplier, Imperial is entitled to take appropriate measures immediately to end the violation or to minimize the extent of the violation.

In this case, the supplier is obliged to take all appropriate measures to end the violation or minimize the extent of the violation.

If the violation is of such a nature that it cannot be remedied in the foreseeable future, the supplier shall promptly develop and implement a plan to terminate or minimize the violation. To the extent required by law, Imperial shall be appropriately involved in the preparation of the concept.

Compliance of sustainability requirements in the supply chain of the suppliers

If there is any indication that a human rights or environmental obligation has been violated in the supplier's supply chain, the supplier shall immediately:

- Participate in Imperial's risk analysis,
- Implement reasonable and appropriate preventive measures at the suppliers concerned, and
- Provide Imperial with appropriate support in the preparation and implementation of the concept for prevention, termination or minimization of the violation.

Whistleblowing

If you have concerns about unlawful conduct or misconduct, please contact Imperial's designated Compliance Hotline.

For this purpose, we have set up one contact point for your anonymous information and it is responsible for all employees around the globe and across the company. There are different toll-free numbers for the individual countries. You can find the relevant one for you in the following table:

Toll-free numbers Whistleblowing hotlines	
Belgium	0800 74346
China	400 120 0209
Germany	08001814791
Netherlands	0800 0201157
Poland	800 005 061
Italy	800 761 612
Sweden	*
Switzerland	*
Spain	900 999 346
Turkey	0811-288-0001
Hungary	06 80 088 043
UK & Ireland	0800 048 8435

You can also use the *whistleblowing online service at <http://www.dpworld.ethicspoint.com> as an additional channel for your anonymous notification.

Contact

DP World Logistics Germany B.V. & Co. KG

Kasteelstrasse 2

47119 Duisburg

www.dpworld.com