



Supplier Code of Conduct

Imperial Logistics International B.V. & Co. KG

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“As a company operating globally we have a particular responsibility to adhere to humane labour and social standards.”

Carsten Taucke, CEO of
Imperial Logistics International B.V. & Co. KG

Dear Sir/Madam,

We see reports in the media almost daily about unbearable working conditions, often relating to the manufacture of many of the consumer products we use every day. Job security, employee rights, regular working hours and fair pay are still almost unheard of in many parts of the world. Thankfully, many companies have set up quality and control systems at their suppliers' production facilities after becoming aware of inhumane working conditions. These are designed to ensure that products are made in fair and humane working environments.

However, when it comes to maintaining labour and social standards, we should not point the finger at newly industrialised countries and the third world. Even in Europe, including Germany, we cannot take fair working conditions and fair pay for granted.

Our company feels obligated to uphold the social aspects of sustainability, which is why we ensure that we and our suppliers treat people and the environment with respect. As a company operating globally, we are aware of our particular responsibility to the environment and the people in it. Our code of conduct gives voice to this responsibility and defines the requirements of our own corporate actions. We have created this supplier code of conduct using the same values spelled out in our own corporate code of conduct.

We expect our suppliers to act in accordance with this code. Careful adherence to the values described in it forms the basis of a partnership between suppliers¹ and Imperial² based on trust.

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

²“Imperial” means Imperial Logistics International B.V. & Co. KG as well as Imperial Mobility International B.V. and all of their subsidiaries

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. It is up to the supplier to ensure adherence to the Code by anyone they contract or employ.

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.

Duisburg, April 2018

Executive Board



Carsten Taucke



Michael Lütjann



Thomas Schulz

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Treatment of employees

We expect our suppliers to act in accordance with the core labour standards of the International Labour Organization (ILO)³.

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

Child labour

Imperial 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.

Forced labour

We prohibit any of our suppliers from using forced labour of any kind in their organisations.

Equal treatment

Suppliers will fight against discrimination in the workplace: For example, no employee will be discriminated against based on their gender, race, skin colour, ethnic origin, religion, age, disability, union or political affiliation, sexual orientation or marital status.

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.

Working time, wages and salaries

We expect our suppliers to pay their employees a fair wage such that a full-time employee dependent solely on their own income would earn a decent living. We expect our suppliers to pay their employees promptly.

³ <http://www.ilo.org>

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.

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 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.

⁴By "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.

Environment and security

We expect our suppliers to protect our natural environment and use existing resources responsibly. We also expect them to create a safe and healthy workplace for their employees.

Environmental protection

Imperial expects suppliers to use strategically and sparingly the raw materials, energy, water and other goods necessary to run their business. This, in turn, will contribute to sustainable development. Suppliers must take all necessary precautions to prevent causing environmental pollution. In disposing of solid waste and discharging waste water, suppliers must act in accordance with all relevant laws.

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 on the part of the supplier

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

Contact

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