

Royal Den Hartogh Logistics

Code of Conduct



DEN HARTOGH
LOGISTICS

Preface

The Royal Den Hartogh Logistics' Code of Conduct is our guideline in doing the right thing in business every day. The Code of Conduct describes the guiding principles of ethical behaviour that are internationally adhered to by Den Hartogh Logistics and sets out the Den Hartogh Logistics' core values.

“Ambitious people realising creative logistic solutions” is our mission statement.

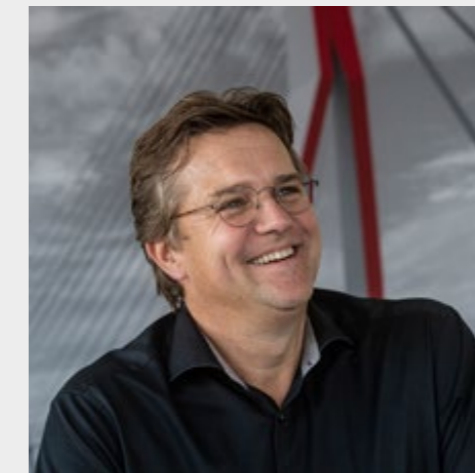
We, Royal Den Hartogh Logistics, believe that the best way – the only way - to achieve this ambition is to operate our business on sound ethical principles and to share these principles with employees and business partners.

- Safety is our number one priority.
- We are committed to sustainable growth.
- We recognize our social responsibility versus employees, contractors, local communities and the wider society.
- We operate with integrity with all partners, according to the principle of fair competition, seeking to be honest and fair in our relationships with suppliers and customers.
- We are committed to fair working conditions and equal opportunities. And we actively encourage our Den Hartogh Community Cares initiatives.
- Data and information is treated confidentially.
- We comply with all applicable laws.

A set of core values form the basis of our Code of Conduct. We embrace and live by these values that reflect the chemistry and atmosphere we want to work in.

This document provides guidelines for the conduct of all directors, managers and employees of the companies of the Den Hartogh Logistics Group. If there is any doubt about its interpretation, each employee should contact his/her line manager for guidance. It is expected that our service providers have in place similar policies, procedures and working practices as reflected in this Code of Conduct.

This Code of Conduct is part of the wider Business Ethics policies of Den Hartogh. We expect you to make yourself familiar with the content of the Code of Conduct and, where applicable, the supporting underlying Business Ethics policies and local policies, so that you will continuously do business in a responsible and sustainable way.



Pieter den Hartogh
Group Managing
Director
Royal Den Hartogh
Logistics



The Den Hartogh values

Our core values are the basis of our Code of Conduct.

 **Caring**

 **Initiative**

 **Openness**

 **People Development**

 **Fun in Business**

 **Respect**



Caring

- For the safety of all: our staff, customers, suppliers and other stakeholders
- For the environment
- For the development of our people
- To enhance teamwork and cooperation between people



People Development

- We invest actively in the development of our people
- Employees are obliged to develop themselves. Life-long learning is key
- Cross-functional job rotation is promoted
- Job rotation between Business units is encouraged
- Working in other countries/offices within the company is facilitated



Respect

- Respect the opinion, culture and values of others
- It is safe to disagree and explain why
- Respect is between people regardless of hierarchy
- Respect for the values of the company and its people
- Jealousy and envy do not belong in our company



Initiative

- Employees have a standing invitation to take or propose actions
- Question routine-like activities in terms of their efficiency and effectiveness
- Employees are expected to take charge of their own development



Openness

- Management must be open and transparent in its communication
- Company politics do not belong to us
- Trust and confidence in what our colleagues say and stand for
- Do what we say
- Attention to the quality of communication, actively check that you are understood correctly



Fun in Business

- Celebrate our successes
- Work stress compensated by enjoyment
- Go to work with a smile
- To work hard with fun is not hard



Responsibilities

Responsibilities of the employee

- Read the Code of Conduct and make yourself familiar with the information.
- Act in a safe and ethical way and in line with the applicable legislation, the Den Hartogh values and Den Hartogh objectives.
- Ask questions and escalate worries if you have concerns or become aware of any possible infringement of legislation, the Code of Conduct or Den Hartogh procedures and regulations.
- Declare daily to yourself and yearly as part of the formal process that you have acted in accordance with this Code of Conduct.

Additional responsibilities for the manager

- Be a role model for your team members and support them by:
 - Enacting the responsibilities of an employee for yourself.
 - Creating an environment which is respectful and where everybody feels part of the team.
 - Encouraging your team and other individuals to speak up.
 - Listening to and reacting on worries when these reported.
 - Ensuring that nobody experiences retaliation after speaking up or expressing worries.
- Help your team members to gain insight in the principles and expectations of this Code of Conduct, Den Hartogh procedures and applicable legislation.
- Be consistent in maintaining our standards and hold people responsible for their behaviour at work.



Escalation process

Everyone within Den Hartogh is encouraged to speak up if confronted with behaviour or a situation that is unsafe, unethical or potentially damaging.

If you are not sure about whether certain behaviour or a situation is appropriate, there are several options to speak up:

1. Can you discuss your worry or question with your direct manager? If yes, contact your direct manager.
2. If not: Can you discuss your worry or question with another manager within your team or location? If yes, contact that other manager.
3. If not: Can you discuss your worry or question with another manager? If yes, contact them.
4. If not: Contact HR or Internal confidant.

Check your local policies on whistleblowing processes and escalation routes.

Retaliation is not tolerated

We do not tolerate any form of retaliation. If you are confronted with retaliation yourself or know that a colleague is confronted with retaliation, please speak up.

Information and training materials

- Business Ethics section of the Den Hartogh website www.denhartogh.com
- Online training environment



The Den Hartogh Principles

Health and Safety

Safety in, every respect, has the highest priority in Den Hartogh. This applies to the physical and social safety of our staff as well as to the safety of the staff of our customers, suppliers and other stakeholders. We aim to achieve a level of Safety Awareness within the company that enables us to continuously and pro-actively improve the level of safety in our operations and to ensure a safe and healthy workplace for our employees in order to prevent risks, accidents or occupational diseases.

There is a joint expectation that employees will work in a safe manner and that the company will provide a safe working environment.

Sustainability and the Environment

We believe in sustainable growth. We have the ambition of succeeding in business and generating wealth today without reducing the opportunity of future generations to do the same.

We recognise the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all. Our primary objective is to minimise our carbon footprint and any negative impact Den Hartogh has on the environment.

We encourage our employees to purchase and operate the most energy efficient method of transport available to reduce our carbon output.

Security, Information and Data Protection

All employees are obligated to respect business secrets and other confidential information of the companies of the Den Hartogh Logistics Group and its business partners. The unauthorized disclosure or use of confidential information is strictly prohibited. These same obligations apply to all suppliers who are provided with information by Den Hartogh to enact their services for Den Hartogh.

The companies of the Den Hartogh Logistics Group comply with all provisions for the protection of personal data and request the same from their employees, in line with the Group Privacy statement and the Group ICT Policy.

Corporate Governance

We strive to operate with integrity with all partners, from our suppliers to our customers. We treat our business partners fairly and with integrity and honesty and expect to be treated the same in return.

We commit ourselves without reservation to the principle of **fair competition** and expect the same from our business partners. We comply with the rules of the competition, anti-bribery legislation and antitrust laws in relation to our customers, suppliers and competitors. No employee of Den Hartogh may offer advantages or demand or accept advantages which are likely to influence a business decision in an unfair way.

Gifts within the context of business relationships or activities should not be given, directly or indirectly, or accepted, directly or indirectly, if could be considered extravagant. Similarly, entertainment should not be extended or received if it could be seen as extravagant or unduly frequent. Gifts and entertainment that exceed an amount of € 75,- (or equivalent in other currencies) are considered to be extravagant. If an individual is uncertain of a situation it should be discussed with the line manager.

(Charitable or other) **donations** will only be made in line with the Code of Conduct and 2nd line manager will be consulted.

Conflicts of interest between the interests of Den Hartogh and personal interests should be avoided. Should such conflicts arise, they must be disclosed to the relevant manager.

The careful handling and protection of the property and assets of the Den Hartogh Logistics Group is an obligation of all employees.

Human Rights and labour standards

Mutual respect is a principle of our culture. We treat all employees with dignity and respect and have zero tolerance to bullying or any form of harassment, intimidation, discrimination or violence. We are committed to fair working conditions and equal opportunities and treat all employees and applicants fairly. We will not tolerate any form of discrimination based on personal characteristics such as race, gender identity, marital status, pregnancy or maternity, age, nationality, ethnic origin, religion or belief, political opinions, sexual orientation or disability.

We seek to create an environment, where all employees, regardless of personal characteristics, can be confident and safe at work.

We respect the rights of employees to freely associate and bargain collectively, in accordance with applicable national laws.

As a committed equal opportunities employer Den Hartogh Logistics will abide by all fair labour practices and strive to ensure that our activities do not directly or indirectly violate human rights in any country (e.g. forced labour, employ underaged staff).

We oppose slavery and human trafficking, and would never knowingly carry out business with suppliers or contractors involved in these practices. We review our operations and supply chain to evaluate the risks in terms of human trafficking and slavery.

Compliance with applicable laws

We conduct our business with honesty and integrity. Compliance with applicable laws is a mandatory foundation for all actions within Den Hartogh in all our activities worldwide. Our employees are obligated to keep themselves informed about the applicable laws and regulations within their areas of responsibility. In this respect, the Executive Committee and General Managers have a special responsibility to provide relevant information to staff members. We comply with trade sanctions imposed by international institutions or governments. The procedures and responsibilities to assure knowledge of, and compliance to, applicable legislation are set in our Integrated Management System. Procurement and Commercial services will only be carried out by employees who received specific training in the relevant regulations and industry best practices.

Self-Test

We encourage you to use this self-test on ethical dilemmas. Go through the questions below to help you to clarify your problem / dilemma.



1. Best self

Does this action represent my best self?
Does it reflect the person I am?

YES NO



2. Consequences

Does this action have any negative consequence (for someone else, Den Hartogh or myself), that I will regret?

YES NO



3. Conscience

Does this act conflict with my conscience? If I do this, do I feel guilty? Will I lose my self-respect?

YES NO



4. Parents / family / colleagues

Would my parents, family, colleagues and others I respect, approve of my action?

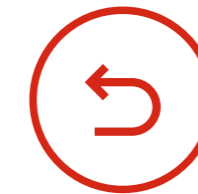
YES NO



5. Internet

Would I wish this was made public via social media and shared with my friends, family, colleagues or employer?

YES NO



6. Golden rule (reversal)

How would I feel if someone would do this to me?

YES NO



7. Is this not in conflict with our Code of Conduct?

If you remain unsure, do not hesitate to discuss the issue with a colleague or your manager (if possible), or contact the internal confidant.

YES NO

Contact

If, in a specific situation, you question what appropriate behaviour means in relation to your own behaviour or that of someone else, or if you wish to report any irregularities, please follow the earlier described escalation process.

