Den Hartogh Group
Statement covering Modern Slavery and Anti-People Trafficking

Rotterdam, 2017
The following document represents the Den Hartogh Group statement covering the Modern Slavery Act and Anti-people trafficking legislation. This document was agreed and approved by a member of the Board of Directors of Den Hartogh.

Name
Date
Signature

K.P. den Hartogh
05-07-2017

[Signature]
TABLE OF CONTENTS

1. STATEMENT 4
2. STRUCTURE, BUSINESS AND SUPPLY CHAIN 5
   2.1. Sectors Den Hartogh Operate in 5
       2.1.1. Liquid Logistics 5
       2.1.2. Gas Logistics 5
       2.1.3. Global Logistics 5
       2.1.4. Dry Bulk Logistics 6
   2.2. Seasonal Performance 6
   2.3. Group Structure and Relationships 6
   2.4. Countries Goods & Services 8
       2.4.1. Countries 8
       2.4.2. Services 8
   2.5. The Supply Chain 9
   2.6. Business operating model 9
   2.7. Business Relationships 10
       2.7.1. Suppliers 10
       2.7.2. Trade Unions 10
       2.7.3. Works Council or other similar bodies 10
3. OTHER POLICIES IN THE ORGANISATION 10
   3.1. Whistleblowing Policy 10
   3.2. Code of Conduct 10
   3.3. Corporate Social Responsibility Policy 10
4. DUE DILIGENCE 11
   4.1. Actions taken to understand business operation 11
   4.2. Risk Management Processes 11
   4.3. Action plans and priorities 11
   4.4. Stakeholder engagement 11
   4.5. Grievance mechanisms to address modern slavery issues 11
   4.6. Actions to embed zero tolerance in organisation 11
5. BUSINESS RISK 12
6. EFFECTIVENESS 12
7. TRAINING 12
STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 (UK).

We expect the same standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
STRUCTURE, BUSINESS AND SUPPLY CHAIN

2.1. Sectors Den Hartogh Operate in

Den Hartogh are one of the world’s leading Logistics Service Providers for the safe and reliable transport of bulk products for the Chemical Industry.

Den Hartogh operate tanks and containers for the carriage of solids, liquids and gases via multi-modal supply chains across the globe, see section 2.5. Den Hartogh provide the service for such operations along with Logistics Management Services, and On Site Logistics Services.

Den Hartogh have operated as an organisation for over 96 years with a huge experience of delivering logistics solutions for the chemical and petrochemical industries.

Den Hartogh is the specialist in road and intermodal transport of bulk liquid, bulk solid and gas products for the chemical industry.

The Group is split into four Business Units, see section 2.3, the following is a summary of the operating sector of these Business Units.

2.1.1. Liquid Logistics

Den Hartogh is specialised in transporting and storing liquid chemicals. For transportation, Den Hartogh Liquid Logistics use large single or multi-compartment bulk-liquid containers and road barrels that provide maximum carrying capacity for every shipment. Den Hartogh Liquid Logistics are employed in the transport of products classified as dangerous goods and non-dangerous goods, across all sections of the “chemical industry”. The Liquid Logistics business unit is predominantly operating within the European land mass.

2.1.2. Gas Logistics

The Business Unit Gas, is specialised in the transportation of Air, Chemical and Liquefied Natural gases.

The air gases include liquids nitrogen, liquid oxygen, liquid argon, hydrogen, carbon dioxide and helium.

Chemical gases include hydrocarbon gases such as propane, butane, isobutene, liquid petroleum gas, and propellants. Den Hartogh Gas Logistics are engaged in the transport of a small number of refrigerants, as well as ammonia. This is a global supply chain business.

2.1.3. Global Logistics

The Den Hartogh Global Logistics business unit utilises large single or multi-compartment bulk-liquid containers for the movement of liquids products. This is a multi-modal operation across the globe.

Den Hartogh Global Logistics are employed in the transport of products classified as dangerous goods and non-dangerous goods, across all sections of the “chemical industry”. This business unit operates on intercontinental as well as inter-regional supply chains across the globe.
2.1.4. Dry Bulk Logistics

The Den Hartogh Dry Bulk Logistics business unit transport free flowing bulk solid products in either our ‘Bag-in-Box’ solution or to a less extent the pressure discharge tank (PDT); an intermodal tank container designed for the carriage of solids. Alongside this, the business unit provides a number of on-site logistics solution including storage and handling. This business unit includes the InBulk Logistics and LinerTech organisations. This business unit operates across a number of sectors including the chemical and the food industry. The main products transported are “solid polymers” used as the feed stock for other industry sectors.

Den Hartogh Dry Bulk Logistics covers activity in UK, Europe and part of Asia; it potentially can operate across all global territories.

2.2. Seasonal Performance

Through examination of the order details and data, for each of our business units, there is no seasonality to the Den Hartogh group business per se. That is, there are not specific peaks and troughs associated with significant shifts in the supply chain with respect to resources and work undertaken by the supplier base in the calendar year.

2.3. Group Structure and Relationships

The Den Hartogh group is headquartered in Rotterdam, The Netherlands. Den Hartogh group operates from a number of countries around the globe. See section 2.4.1. The organisation has in the region of 1,500 employees.

The Board of Directors is built up as follows;

<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pieter den Hartogh</td>
<td>Group Managing Director</td>
</tr>
<tr>
<td>Bram Paape</td>
<td>Group Financial Director</td>
</tr>
<tr>
<td>Annelies Balistreri</td>
<td>Group HR Director</td>
</tr>
<tr>
<td>Joep Aerts</td>
<td>Liquid Logistics Director</td>
</tr>
<tr>
<td>Mark Warner</td>
<td>Global Logistics Director</td>
</tr>
</tbody>
</table>
The business units as discussed in section 2.1 are managed within the following structure. Each Business unit has its own management team for the implementation of “strategy” at the business unit level.

The financial structure of the organisation is based on the operating countries. E.g. the individual’s country registration for delivery of goods and services within that country. The organogram for this structure is complex and maybe made available upon request.
2.4. Countries Goods & Services

2.4.1. Countries
As stated, Den Hartogh group operate in the following countries as own Den Hartogh activity, location and operation.

<table>
<thead>
<tr>
<th>Location</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zele</td>
<td>Belgium</td>
</tr>
<tr>
<td>Carrington</td>
<td>England</td>
</tr>
<tr>
<td>Hull</td>
<td>England</td>
</tr>
<tr>
<td>Immingham</td>
<td>England</td>
</tr>
<tr>
<td>Stockton</td>
<td>England</td>
</tr>
<tr>
<td>Wilton</td>
<td>England</td>
</tr>
<tr>
<td>Porvoo</td>
<td>Finland</td>
</tr>
<tr>
<td>Duisburg</td>
<td>Germany</td>
</tr>
<tr>
<td>Worms</td>
<td>Germany</td>
</tr>
<tr>
<td>Le Havre</td>
<td>France</td>
</tr>
<tr>
<td>Budapest</td>
<td>Hungary</td>
</tr>
<tr>
<td>Coevorden</td>
<td>Netherlands</td>
</tr>
<tr>
<td>Rotterdam</td>
<td>Netherlands</td>
</tr>
<tr>
<td>Tonsberg</td>
<td>Norway</td>
</tr>
<tr>
<td>Warszawa/Zabrze</td>
<td>Poland</td>
</tr>
<tr>
<td>Grangemouth</td>
<td>Scotland</td>
</tr>
<tr>
<td>Gothenburg</td>
<td>Sweden</td>
</tr>
<tr>
<td>Chiasso</td>
<td>Switzerland</td>
</tr>
<tr>
<td>Mortara</td>
<td>Italy</td>
</tr>
<tr>
<td>Rio de Janeiro</td>
<td>Brazil</td>
</tr>
<tr>
<td>Qingdao</td>
<td>China</td>
</tr>
<tr>
<td>Shanghai</td>
<td>China</td>
</tr>
<tr>
<td>Karlsruhe</td>
<td>Germany</td>
</tr>
<tr>
<td>St Petersburg</td>
<td>Russia</td>
</tr>
<tr>
<td>Tomsk</td>
<td>Russia</td>
</tr>
<tr>
<td>Singapore</td>
<td>Singapore</td>
</tr>
<tr>
<td>Istanbul</td>
<td>Turkey</td>
</tr>
<tr>
<td>Dubai</td>
<td>UAE</td>
</tr>
<tr>
<td>Dnipro</td>
<td>Ukraine</td>
</tr>
<tr>
<td>Houston</td>
<td>USA</td>
</tr>
</tbody>
</table>

For activities through Asia, South America, Mediterranean, Canada, Africa plus other specific countries; Den Hartogh group utilise an Agent network. Here specific Agency Agreements are in place. These are managed by the Regional Director / General Manager for the region, in which the Agent is tasked to operate.

2.4.2. Services
For transport, Den Hartogh make use of our own fleet of approximately 26,000 liquid, gas and dry bulk containers, 550 trucks and 400 road barrels.

The following are the services provided by Den Hartogh directly.

<table>
<thead>
<tr>
<th>Service</th>
<th>Tank Containers</th>
<th>Trucks</th>
<th>Drivers (Europe)</th>
<th>Workshop &amp; Repair activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Road Barrels</td>
<td>Chassis</td>
<td></td>
<td>Operatives (on site)</td>
<td></td>
</tr>
<tr>
<td>30ft &amp; 20ft Dry Boxes</td>
<td>Office Staff</td>
<td>Other Staff</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Other Staff</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The following are a list of services provided via external 3rd party suppliers.

<table>
<thead>
<tr>
<th>Service</th>
<th>Rail carriage</th>
<th>Trucks</th>
<th>Drivers</th>
<th>Workshop &amp; Repair activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vessel (Sea &amp; barge) provision</td>
<td>Chassis</td>
<td>Other Staff</td>
<td>Cleaning facilities</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Liner provision</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

All suppliers go through an approval process managed by the General Manager and the Regional Procurement management.
2.5. The Supply Chain

The basic model of the business is as follows.

The transport unit is as listed above; Tank container, road barrel or box container. There is a mixture of own, leased and managed equipment in the supply chain. The supply chain is undertaken on behalf of a “customer”. The terms of activity are directed by the INCO Terms of the sales and services. Not all customers of Den Hartogh are bound by a term contract. Not all 3rd party suppliers are bound by a formal contract. The parties in activity with Den Hartogh, these services will be carried out based on the agreed Terms & Conditions.

2.6. Business operating model

Orders for carriage of goods and the provision of services are received through contract, spot and 3rd party clearing house. The execution of these orders is through own direct and external 3rd party resources. All suppliers go through a form of approval before use.

Trucking provision from 3rd party is by direct agreement. The trucker can not sub-contract this work unless specifically agreed.

Vessels including barge are dictated by the parties operating on the routes required. The procurement team oversee the selection of the shipping line based on routes, performance and costs. The party to whom the booking is made may not be the actual operator of the vessel or the direct employers of the crew. This also links with the port staff employed to move the container between truck, port side or vessel.

Rail service providers are dictated by the parties operating on the routes required. The procurement team oversee the selection of the rail service company based on routes, performance and costs. The party to whom the booking is made may not be the actual operator of the train or the direct employers of the rail staff. This rail booking may also not link with the rail head staff employed to move the container between truck, rail side or train.
2.7. Business Relationships

2.7.1. Suppliers
As stated, Den Hartogh group operate a number of different suppliers to the businesses. These suppliers provide a range of goods or services. These are under some form of TnC’s for the activity.
Where contracts are in place these are managed by the Den Hartogh contract owner and subject to the country law of jurisdiction as reflected by the agreed terms of the contract.

2.7.2. Trade Unions
Den Hartogh follow the (regional) national laws of the country it is operating in with regards to the position of a formal trade union agreement being in place and representing the work force.

2.7.3. Works Council or other similar bodies
Den Hartogh group follows the (regional) national laws of the country it is operating in. If these allow and the local structure requires / request the formation of a “works council, staff representation or such structure” then this is allowed and encouraged. Alongside any formal structure locations are encouraged to operate meetings centred on local HSE issues and concerns.

Other Polices in the Organisation.

As a business we recognise our responsibility to be aware of the risks of Modern Slavery within our own organisation and supply chain. We therefore have the following policies:

3.1. Whistleblowing Policy
Den Hartogh group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
The UK organisation’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

3.2. Code of Conduct
Den Hartogh groups code of conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating ‘locally’, within region and across the globe when managing its supply chain.

3.3. Corporate Social Responsibility Policy
We aim to support and respect the protection of internationally proclaimed human rights.
Due Diligence

4.1. Actions taken to understand business operation

Representatives from each of the business units and departments met to identify the supply chain process and the various suppliers and locations involved.

4.2. Risk Management Processes

As part of the ongoing strategy, Den Hartogh is in the process of developing “Risk Registers” in the business. The goal of the “Risk Registers” is to identify and quantify potential risks to the business and ensure that sufficient actions are taken to mitigate. Alongside the Risk Registers, there will be procedures to outline roles and responsibilities, along with action plans which are to be reviewed quarterly by the respective management teams.

4.3. Action plans and priorities

Den Hartogh have developed a project group with a cross-section of members to develop an action plan in terms of target setting related to the MSA policy and statement.

4.4. Stakeholder engagements

We have trained a core group of managers on the Modern Slavery Act. Forming a project group to lead on the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations. Information will be cascaded to all stakeholders via newsletters and other appropriate means.

4.5. Grievance mechanisms to address modern slavery issues

Den Hartogh have existing systems in place to enable staff to voice any concerns (including Modern Slavery and Anti-people trafficking). Grievance procedures are designed to investigate and deal with any alleged issues raised in an open, fair and consistent manner.

4.6. Actions to embed zero tolerance in organisation

Within Den Hartogh group, we ensure that all employees have a legal right to work in the country that they are employed and are paid in line with minimum wage legislation for that country.
Business Risk

Den Hartogh are committed to ensuring there is no modern day slavery or human trafficking in our supply chains or any part of our business and we have therefore initiated a high level risk assessment to research these areas. The results of this research will identify main areas and stakeholders geographically and modally at highest risk of involvement/participation. Priority will be applied to areas of highest recorded slavery as published per the Global slavery index. Thereafter we will undertake regular review to ensure ongoing monitoring (of risk areas).

Effectiveness

During 2016 and 2017, Den Hartogh have implemented the requirements of the Modern Slavery Act 2015. We will, going forwards, set annual targets related to the effectiveness of the controls identified within the group. Den Hartogh will measure the implementation of improvements, as the improved ways of working are identified. These “performance indicators” will be referenced historically in the review of the “Group Statement covering the Modern Slavery and Anti-people trafficking”, which will be undertaken annually, released, and published as required under the UK Legislation, the MSA.

Training

We have supplied training to a core group of managers across a cross section of departments within the business units, to raise the profile of the Modern Slavery Act. These managers form a project team to identify actions with the aim to ensure the prevention, detection and reporting of Modern slavery. This work and actions are an integral part of our business process and supply chains. It is the responsibility of all those working for us or within our supply chains to apply as required. Our code of conduct has been distributed to all our offices and is available on our website. Further training will be identified during the risk assessment process. Once a potential area of vulnerability has been identified, training will be given to reduce the risk, prevent the occurrence, as well as raise the profile of the modern slavery compliance.