

Conduct Code Suppliers

Code of Business Conduct for Suppliers

This Code of Business Conduct for Suppliers sets forth basic principles for supplier conduct when working with Borchard Lines Ltd. Borchard Lines Ltd is committed to these principles and expects its suppliers to be as well.

HUMAN RIGHTS & LABOUR: Respect for People is a core Borchard Value. We adhere to these principles and expect our suppliers to respect the human rights of their employees and treat them fairly, in accordance with all applicable laws.

Respect Freedom of Association and Collective Bargaining: Suppliers will respect employees' lawful right of free association, as well as their lawful right to join, form or not to join a labour union or otherwise engage in collective bargaining.

No Forced and Compulsory Labour: Suppliers will not use forced or involuntary labour, including prison labour, indentured labour, bonded labour or slave labour.

No Harassment and Abuse of Labour: Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse, and will comply with all applicable laws on harassment and abuse of employees.

No Child Labour: Suppliers will comply with all applicable child labour laws.

No Discrimination: Suppliers will not discriminate in any condition of employment on the basis of race, colour, national origin, sex, religion, age, disability, HIV/AIDS status, trade union membership, sexual orientation or any other personal characteristic unrelated to job performance, and will comply with all applicable employment discrimination laws.

Supplier Diversity: Suppliers are encouraged to have an active Supplier Diversity Program and engage with small businesses, minority- and woman-owned businesses and other diverse categories.

Appropriate Work Hours and Wages: Suppliers will comply with all applicable laws on work hours and overtime, as well as all applicable laws on wages and benefits.

ENVIRONMENT, HEALTH & SAFETY: Borchard's commitment to sustainability includes efficient use of resources, respect for the environment and safe and healthy workplaces. Borchard expects its suppliers to make similar commitments to continuously improve their environmental, health and safety performance.

Respect the Environment: Suppliers will comply with all applicable environmental laws. Suppliers will have systems in place to ensure safe management of waste, air emission and wastewater discharges. Borchard will favour suppliers who seek ways to minimize the use of non-renewable resources, use all resources more efficiently and minimize the environmental impact of our combined operations.

Protect Health and Safety: Suppliers will comply with all applicable workplace health and safety laws. Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures and personal protective equipment.

ETHICS & LEGAL REQUIREMENTS: Borchard expects its suppliers to conduct their business as Borchard strives to conduct its business: ethically and in compliance with the law.

Avoid Conflicts of Interest: Suppliers will avoid any interaction with a Borchard employee that may conflict, or appear to conflict, with that employee acting in the best interests of Borchard. This includes offering payments or employment opportunities to Borchard employees.

No Bribery: Suppliers will not engage in any form of commercial bribery or otherwise offer any incentive to any Borchard employee or Borchard employee's family or friends in order to obtain or retain Borchard business. Suppliers will comply with the UK Bribery Act and all other local or otherwise applicable laws dealing with the bribery of government officials.

Conduct Code Suppliers

Fair Competition: Suppliers will comply with all applicable laws regarding fair competition and antitrust.

Accurate Accounting and Business Records, Money Laundering and Insider Trading: Suppliers will keep - and provide to Borchard upon request – accurate records of all matters related to the supplier’s business with Borchard and shall not engage in any form of money laundering and shall never knowingly accept funds acquired through illicit means. No confidential information in the supplier’s possession regarding Borchard shall be used to engage in or support insider trading.

Protect Information: Suppliers will protect Borchard’s confidential information, including personal information, and act to prevent its misuse, theft, fraud or improper disclosure and will comply with all applicable data privacy laws. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect Borchard, its employees, its customers, the business community or the general public.

International Trade: Suppliers will comply with all applicable laws governing international trade. Suppliers will provide Borchard with documentation necessary for Borchard to comply with applicable laws, and will implement practices and procedures to ensure security of their supply chain under applicable regulations.

Sanctioned Parties: It is prohibited to use any supplier of services, goods or equipment which (a) is located in any country subject to United Nations, U.S., U.K. or EU economic sanctions (or acting on behalf of persons or entities located in such countries) or (b) appears on lists of restricted or prohibited persons maintained by the United Nations, U.S., U.K., EU or the country of manufacture, origin/destination of the goods or equipment.

COMPLIANCE: In addition to the legal standards mentioned in this Code, suppliers will comply with all other applicable laws in the provision of products or services to Borchard. Borchard expects suppliers to implement systems and controls to promote compliance with applicable laws and the principles set forth in this Code, including policies, training, monitoring and auditing mechanisms. Suppliers should also apply these or similar principles to the subcontractors and suppliers they work with in providing goods and services to Borchard.

ALL RIGHTS RESERVED: Borchard reserves the right to assess and monitor suppliers’ compliance with this Code. Suppliers who are not in compliance with this Code may be terminated and/or precluded from consideration of future business. Suppliers must promptly implement corrective actions.

REPORTING MISCONDUCT: Suppliers who believe that a Borchard employee or anyone acting on behalf of Borchard has engaged in illegal or otherwise improper conduct with respect to their business with the supplier should report the matter to Borchard. Suppliers should also report any potential violation of this Code. A supplier’s relationship with Borchard will not be affected by an honest report of potential misconduct.