

Code of Conduct for Contractors, Subcontractors and Suppliers

Koole Terminals and its affiliated companies are committed to ethical principles and place great value on integrity and compliance with the applicable laws and regulations.

We expect our business partners to follow at least similar standards in their behaviour.

Our expectations are set out in the following statement. This statement is an integral part of the agreements (such as framework agreement, supply agreement, procurement order, agreement for services or temporary employment agreement) that have been or will be agreed upon with Koole Terminals.

Professionalism

- Contractors, subcontractors and suppliers shall at all times act in accordance with the applicable laws and regulations and the principles, standards and values that apply at Koole Terminals and shall avoid damaging the name and reputation of Koole Terminals through their statements and actions, both at the project sites and elsewhere. Contractors, subcontractors and suppliers should provide high-quality products and services and are expected to record transactions in accordance with applicable procedures and to handle information with care.

Safety

- Contractors, subcontractors and suppliers must comply with the health and safety regulations applicable within Koole Terminals, as also described in the HSEQ Procurement Conditions. These HSEQ Procurement Conditions are attached to the Code of Conduct as annex I and are considered an integral part of the Code of Conduct. Koole Terminals may update the HSEQ Procurement Conditions from time to time in an appropriate manner and expects its contractors, subcontractors and suppliers to accept such amendments.
- Koole Terminals expects contractors, subcontractors and suppliers to be mindful of our and their own safety as well as that of others. Contractors, subcontractors and suppliers are expected to make every effort to report unsafe situations and resolve them immediately.
- In particular, contractors, subcontractors and suppliers must comply with the safety requirements concerning ATEX-tools, own PPE's, tools and machines, as also included in the HSEQ Procurement Conditions, in order to ensure their own safety and the safety of others.

Environment

- Koole Terminals expects contractors, subcontractors and suppliers to comply with all local environmental regulations and rules and to prevent damage to the environment and surroundings at all times. Contractors, subcontractors and suppliers of Koole Terminals are required to comply with the principles of the Global Impact Initiatives, as well as the minimum standards included in this Code of Conduct for Contractors, Subcontractors and Suppliers (Code of Conduct), and to also impose these in writing on their subcontractors and suppliers.

Integrity

- Koole Terminals expects contractors, subcontractors and suppliers to keep business and private interests separate, avoiding any appearance of a conflict of interest. Gifts and gratuities, both internal and from third parties, may never influence the decision-making process. Contractors, subcontractors and suppliers are expected to act in good faith at all times and abuse of power is not be permitted under any circumstances.

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Combatting prohibited agreements

- Contractors, subcontractors and suppliers shall not engage in illegal trade restrictions, anti-competitive agreements, abuse of economic power or cartels. Furthermore, contractors, subcontractors and suppliers shall comply with the applicable legal provisions concerning the employment of employees and take decisive action against illegal employment and undeclared work.
- Contractors, subcontractors and suppliers shall not engage in any conduct that would put the Kooole Terminals organisation at risk of violating anti-bribery laws.

Corruption and bribery.

- Contractors, subcontractors and suppliers shall in no way commit direct or indirect acts of corruption, including extortion, fraud and/or bribery. Contractors, subcontractors and suppliers are obliged to comply with all relevant anti-corruption and anti-bribery laws and regulations, including the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the UK Bribery Act 2010.

Respect and Discrimination

- Contractors, subcontractors and suppliers should create a working environment in which everyone feels comfortable and approaches each other with fairness and dignity. In this working environment, everyone should be accepted as he or she is. In no way will a contractor, subcontractor or supplier discriminate or act in a discriminatory manner in the hiring and employment of personnel, nor in the granting of employment-related benefits, including but not limited to compensation, access to education and training and termination of contracts.
- Contractors, subcontractors and suppliers must respect the diversity of their employees, customers and others with whom they come into contact, including respect for differences such as gender, race, colour, age, disability, sexual orientation, ethnic origin and religion.

Employment practices

- Contractors, subcontractors and suppliers shall comply with applicable employment standards and legislation on employment standards-, non-discrimination- and human rights.
- Contractors, subcontractors and suppliers shall respect the right of employees to join or refrain from joining associations and workers' organisations.
- Contractors, subcontractors and suppliers must be able to demonstrate at their workplace that:
 - i. no child labour is used;
 - ii. discrimination and harassment are prohibited, including discrimination or harassment based on a characteristic protected by law;
 - iii. employees are free to raise concerns and speak up without fear of retaliation;
 - iv. appropriate and reasonable background screening, including investigation of previous criminal activities, is conducted to ensure the integrity and good character of the supplier's employees;
 - iv. clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements.

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Privacy and information security

- Contractors, subcontractors and suppliers must comply with the applicable laws, rules and regulations of the jurisdictions in which they operate with regard to privacy and information security, and may only use information obtained through their relationship with Koole Terminals to the extent strictly necessary for the performance of the work.
- Contractors, subcontractors and suppliers must have appropriate information security policies and procedures in place to protect access to Koole Terminals information.
- Contractors, subcontractors and suppliers should inform Koole Terminals immediately about actual or suspected breaches of privacy, security breaches or loss of Koole Terminals information.
- Contractors, subcontractors and suppliers must keep all information about Koole Terminals, the contracted services and the performance of the services confidential.

Resumption of business operations and emergency planning

- For some services performed by contractors, subcontractors and suppliers, due to the importance to our operations or the types of operations that may be involved, Koole Terminals expects that for business continuity of the contractors, subcontractors and suppliers emergency recovery plans are developed, maintained and tested in accordance with applicable legal, contractual and service level requirements.

Audit

- Koole Terminals is entitled to conduct an audit of contractors, subcontractors and suppliers to verify compliance with the Code of Conduct. If Koole Terminals is of the opinion that the contractor, subcontractor and/or supplier does not comply with the provisions of this Code of Conduct, Koole Terminals shall be entitled to terminate the agreement with the contractor, subcontractor and/or supplier.

Whistleblower scheme

- For reports of violations of the Code of Conduct, you may contact the confidential advisor of Koole Terminals. If desired, these reports can also be made anonymously.

The confidential advisor of Koole Terminals can be contacted via:

Janna Nigten (General Counsel Koole): +31 613633726 / j.nigten@koole.com

Contractors, subcontractors and suppliers are obliged to investigate suspicious cases and to cooperate with Koole Terminals without reservation. If there is reasonable suspicion that a contractor, subcontractor or supplier has violated the Code of Conduct, or if a subcontractor or supplier in the event of suspicion fails to fully comply with its obligation to investigate and cooperate, Koole Terminals may terminate the business relationship with the relevant contractor, subcontractor or supplier with immediate effect on the basis of the existing contractual or statutory rights. In the event of violation of the Code of Conduct, Koole Terminals reserves the right to take further legal action, in particular to claim compensation.

Koole Terminals may amend the Code of Conduct from time to time as appropriate and expects its contractors, subcontractors and suppliers to accept such amendments. By signing, the contractor, subcontractor and/or supplier declares to have received the Code of Conduct and to comply with the obligations, in addition to the other contractual obligations with Koole Terminals.



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Place and date

Signature contractor/subcontractor/supplier

Company stamp

Name (in block capitals), position