

TCR - Slavery and Human Trafficking Statement

This statement is made on behalf of TCR International N.V. and its subsidiaries, together with TCR UK Limited (collectively, the "TCR") and, pursuant to Section 54, Part 6 of the UK Modern Slavery Act 2015, sets out the steps that TCR has taken and is continuing to take to ensure that modern slavery and human trafficking is not taking place in any part of its business or supply chain. References in this statement to "we" or "our" are to TCR.

This Statement relates to the financial year ending on 30th June 2019.

Our organisation and our business

TCR is a leading provider of a comprehensive range of GSE (Ground Support Equipment) services that supports customers, such as handling companies, airlines, airports and cargo handlers, in a vital aspect of their ground handling processes: the use and operation of their GSE. This includes offering expertise in GSE rental, GSE fleet sale and rent-back, GSE repair and maintenance, ramp assistance and sale of second hand or pre-used GSE.

We are headquartered in Belgium and have affiliated companies across Europe, as well as in the US, Middle East, Australia and Malaysia with operations in many other countries and present in more than 130 airports.

TCR's operations in the UK are carried out through TCR UK Limited, as well as Technical Maintenance Solutions UK Limited.

Our people

In 2019, TCR has completed acquisitions in France and taken over other activities in the UK. This resulted in a considerable increase in the number of staff in comparison to our previous statement. TCR currently employs over 1.300 staff worldwide. The vast majority are highly-trained technicians skilled in mechanics and electronics and directly in charge of the maintenance of GSE in about 86 workshops at airports spread over 5 continents.

We expect all our employees to be treated with respect. HR practices are set in place to ensure integration and wellbeing at work, and protecting the health and safety of all our employees.

Our policies and actions with regard to slavery and human trafficking

We recognise and consider modern slavery as a criminal offence and a fundamental breach of human rights. TCR has incorporated its commitment to support and uphold the principles set out in the Universal Declaration of Human Rights and the conventions of the International Labour Organisation in its International Code of Conduct: we will do everything possible to prevent and forbid the use of child labour or forced labour in relation to our activities and those of our business partners (customers, suppliers, subcontractors).

TCR will not tolerate any form of forced labour, slavery or human trafficking and will not accept such behaviour from its employees, customers, suppliers, GSE users, shareholders or any other of its stakeholders. Contracts with suppliers contain clauses prohibiting the use of child labour or forced labour on its sites and the obligation to apply the principles with respect to the protection of international human rights. The breach of such clauses shall result in immediate termination of any such contractual relationships.

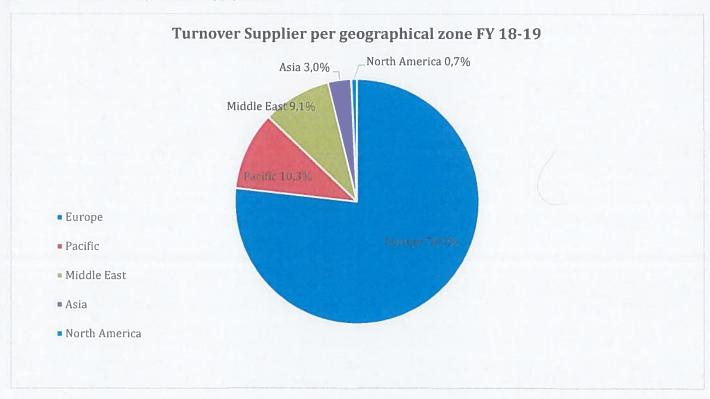


In our newest CSR Report dated September 2019, we reconfirm to defend and promote everywhere we operate the principles, values and ethics that TCR stands for. One of TCR's values expected to be lived at work and to guide our staff's conduct is integrity: we live by our highest moral standards and act with respect towards all. These are not just words: TCR's values are alive and are an important criterion in the TCR recruitment and evaluation process.

Our newest CSR Report also confirms that, through the Code of Conduct, we aim to ensure that all individuals acting in the name or on behalf of TCR conduct their activities in accordance with our values, ethical requirements, and the laws and regulations applicable in the countries in which we are present. And we encourage our personnel to report concerns or suspicions regarding any breach of the Code of Conduct, including violations with regard to slavery and human trafficking, in accordance with its Whistleblowing Policy, without fear for retaliation.

Our supply chain and assessed risk areas

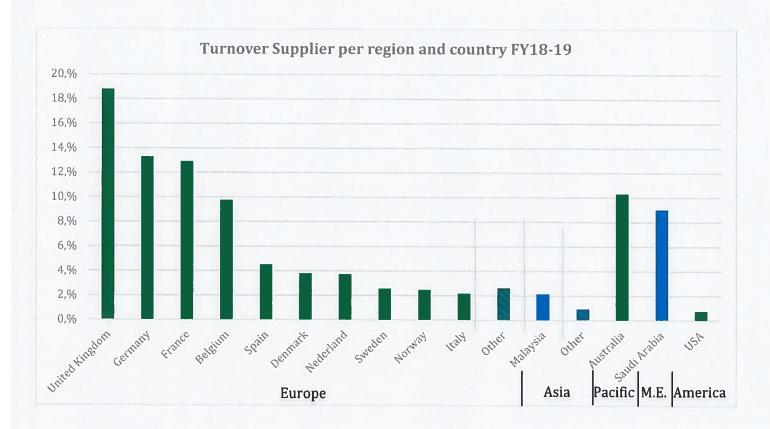
During the financial year 2018-2019, we have received goods and services from more than 5.000 suppliers. The yearly spent of TCR Group's procurement activities sits primarily within its core business for GSE and spare parts. Over the last financial year, TCR has purchased several GSE fleets from its customers under sale and rent back operations in a.o. Australia, Saudi Arabia and the UK. This explains the considerable increase of the procurement turnover in these regions, compared to previous years. Newly acquired GSE originate mainly from Germany, France and the UK. The customers and suppliers from whom TCR purchased such GSE are all major global players that have underwritten strong commitments against Modern Slavery in their supply chain.



Overall, in the financial year 2018-2019, the major part of our supply chain spent has been delivered from countries or suppliers with low risk with regard to slavery and human trafficking: 87% from countries with a Government response rating in category BB or higher (Global Slavery Index 2018), marked in green in the graph below. The purchases in Saudi Arabia are all related to the aforementioned sale and back operations with a major global customer, with a strong commitment against Modern Slavery in their supply chain.



About 4% of our supply chain expenses goes to more sensitive activities (subcontracting of maintenance services, work clothing, transport, site facilities) or higher risk countries in relation to slavery or human trafficking (as identified in the Global Slavery Index 2018). However, such supply chain operates within the very regulated environment of airports, where employees and products are subject to security measures and verifications, background and/or criminal checks of employees, generally requiring competent skilled staff holding high technical industry or professional qualifications. Such environment does not tolerate slavery and human trafficking. Moreover, we check if our suppliers have issued statement confirming their adherence to the UK Modern Slavery Act 2015 or we request the supplier to provide their code of conduct for vendors if they have. Such documents allow to consider the risk of suppliers complying with their obligations with regard to slavery and human trafficking or child labour.



Awareness and Communication

Whilst we are not aware of any instances of modern slavery or human trafficking within our business or supply chain, we will continue to take measures to ensure that modern slavery is banned from our business, by ensuring that the procurement team are fully trained to recognise the risks of modern slavery and human trafficking and will take appropriate action where needed.

We will further raise targeted awareness and communication, in particular with and to our procurement and HR staff, with regard to modern slavery issues, by improving training on TCR's International Code of Conduct or other Compliance policies such as TCR's Anti-Bribery and Corruption Compliance Training. We believe that such trainings, together with our policies, contribute to a positive compliance culture within TCR, supported by all employees.



TCR Commitment

We will consider improving our due diligence process for monitoring the risk profile of suppliers, whether they are new or existing. Even if suppliers have confirmed their commitment through contractual obligations or Slavery & Human Trafficking Statements, we intend to encourage our staff to remain vigilant to potential abuse with regard to modern slavery and human trafficking and to report any concerns.

Overall, TCR is committed to being a responsible and sustainable company, operating with integrity and transparency and will continue to further develop its CSR strategy for its business and supply chain as outlined on its website (https://www.tcr-group.com/about-us/corporate-social-responsibility), including a zero tolerance approach to forced labour, slavery and human trafficking in whatever form.

The above statement has been approved by the board of directors of TCR International N.V. and TCR UK Limited.

Tom Bellekens

CEO

TCR INTERNATIONAL N.V.

1st October 2019

Kristof Philips Director

TCR UK Limited