



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 and Technical Maintenance Solutions UK Limited (hereinafter collectively referred to as “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 references to TCR.

This Statement relates to the financial year ending on 30th June 2021.

Our organisation and our business

TCR is a leading provider of a comprehensive range of ground support equipment (hereinafter referred to as “GSE”) and 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 we are 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

TCR currently employs almost 1.100 staff worldwide. The vast majority are highly-trained technicians skilled in mechanics and electronics and directly in charge of the GSE maintenance in about 80 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. Especially since the start of the COVID-crisis, TCR takes particular attention to assist its employees in dealing with the many side effects resulting from the pandemic.

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 recently revised 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 its CSR Report (issued in September 2019), TCR reconfirms to defend and promote everywhere it operates the principles, values and ethics that it 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.

TCR’s CSR Report also confirms that, through its 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 our Code of Conduct, including violations with regard to slavery and human trafficking, in accordance with our Whistleblowing Policy, without fear for retaliation.

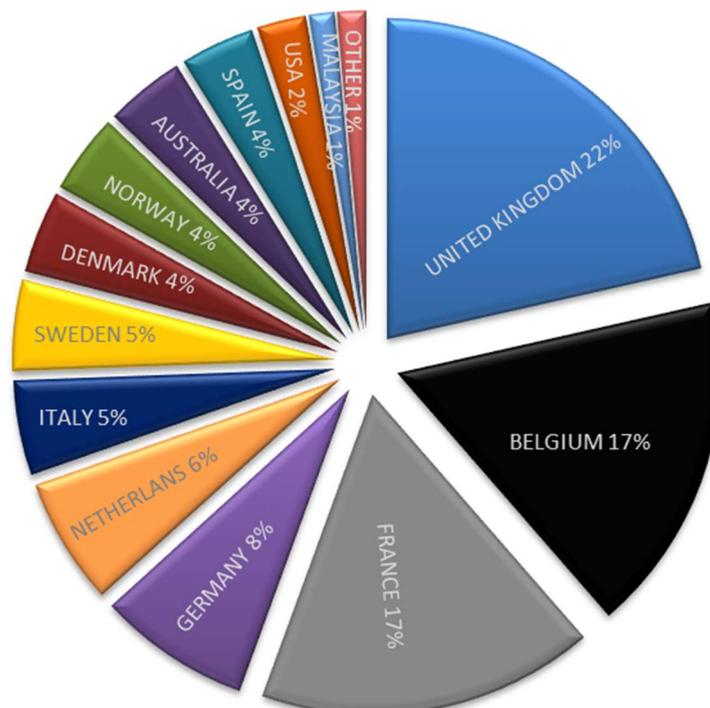
Our supply chain and assessed risk areas

Within TCR supplier agreements the Supplier Code of Conduct is included and any onboarding of new suppliers are sent a copy and are also informed that TCR will not work with any supplier that does not act ethically and with integrity with regards to slavery and human trafficking within its supply chain.

Environmental, Social and Governance (“ESG”) has recently been introduced to supplier agreements which allows Procurement to be able to collect data and monitor suppliers contribution to TCR’s obligation to report on Streamline Energy and Carbon Reporting (SERC) this includes minimizing our waste, ensuring safety, recruit a diverse talent base, cyber security and delegation of authority (DOA).

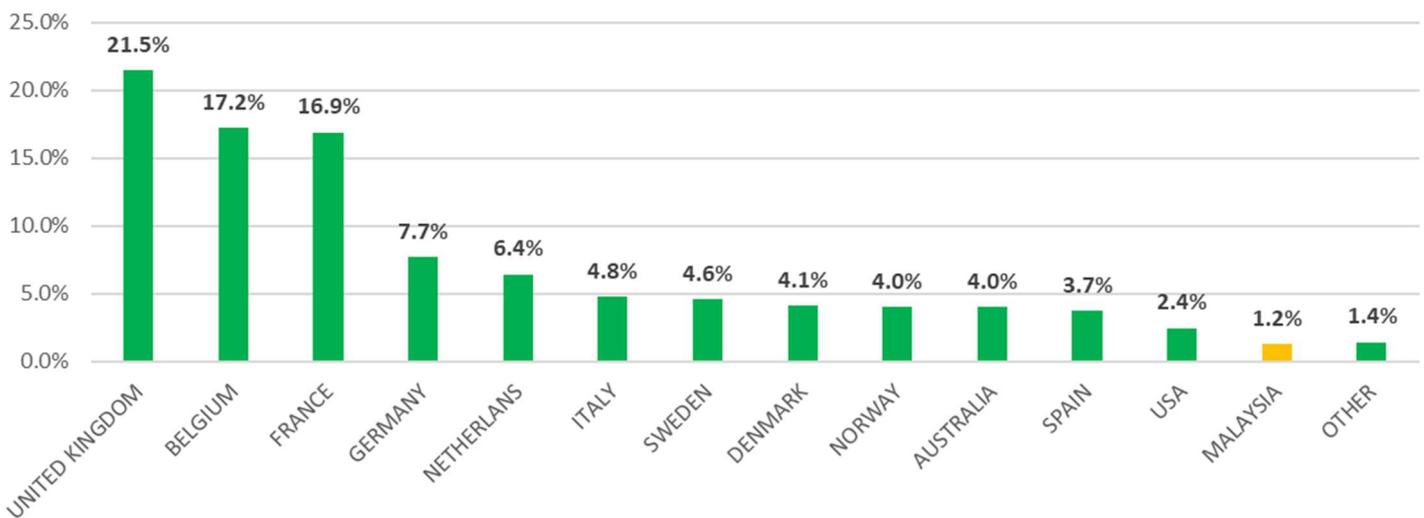
During the financial year 2020-2021, we have received goods and services from more than 4,000 suppliers. This is similar to the previous financial year. The yearly spent of TCR Group’s procurement activities sits primarily within its core business for GSE (sale and lease back, as well as the acquisition of new 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 amongst others the United Kingdom, France, Sweden and Finland while newly acquired GSE originated mainly from Denmark, Germany, Sweden, France and the United Kingdom. These customers and suppliers are generally established global players, with outstanding service levels and managing their business with integrity and respect for rules and regulations. They are expected to promote better work environment for their employees as well as those of their customers and clients using the acquired products. As far as relevant legislation applies, they have published a statement on modern slavery such as the UK Modern Slavery Act or the California Transparency in Supply Chains Act 2010.

Supplier Turnover per country FY 20-21



In general and as in previous financial years, the major part of our supply chain spent in the financial year 2020-2021 has been delivered from countries or suppliers with low risk with regard to slavery and human trafficking: 98 % 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 Asia are largely in Malaysia, country in which TCR has a standing business. Malaysia has a lower rating in the aforementioned Global Slavery Index 2018. This relates In general to the production of clothes or certain farms and factories such as the palm oil industry. However, TCR’s suppliers in Malaysia are very often the local subsidiaries of first tier global service providers in the banking, insurance, consulting and logistic business. Local suppliers are either airports we are paying rent to amongst others for our workshops, or reputable contractors.

Supplier Turnover per country FY 20-21



In any case does TCR’s supply chain operate 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.

Also for the financial year 2020-2021, the Board of the TCR Group has identified “sustainable procurement” as one of the ESG focus area. Therefore will continue to focus on setting up more stringent processes while purchasing equipment and spare parts. A vendor risk assessment and due diligence of vendors shall improve control over risks related to modern, slavery and human trafficking but also on other environmental, social and corporate governance issues. This will include

the development of a Supplier Code of Conduct which shall become one of the main aspects of our strategy to ensure compliance of suppliers with human rights and combat modern slavery in our supply chain. We will expect our suppliers to adhere to the letter and spirit of the Code of Conduct.

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., TCR UK Limited and Technical Maintenance Solutions UK Limited.

Tom Bellekens
CEO
TCR INTERNATIONAL N.V.



Pieter Belien
Director
TCR UK Limited and
Technical Maintenance Solutions UK Limited



13 December 2021