



TCR GROUP

SLAVERY & HUMAN TRAFFICKING STATEMENT

1st October 2018



SLAVERY & HUMAN TRAFFICKING STATEMENT

This statement is made on behalf of TCR International N.V. and its subsidiaries, together with TCR UK Limited (collectively, “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.

OUR ORGANISATION & 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, Australia and Malaysia with operations in many other countries. As a result, TCR is present in more than 120 airports and customers serving almost 5000 flights per day.

TCR’s operations in the UK are carried out through TCR UK Limited.

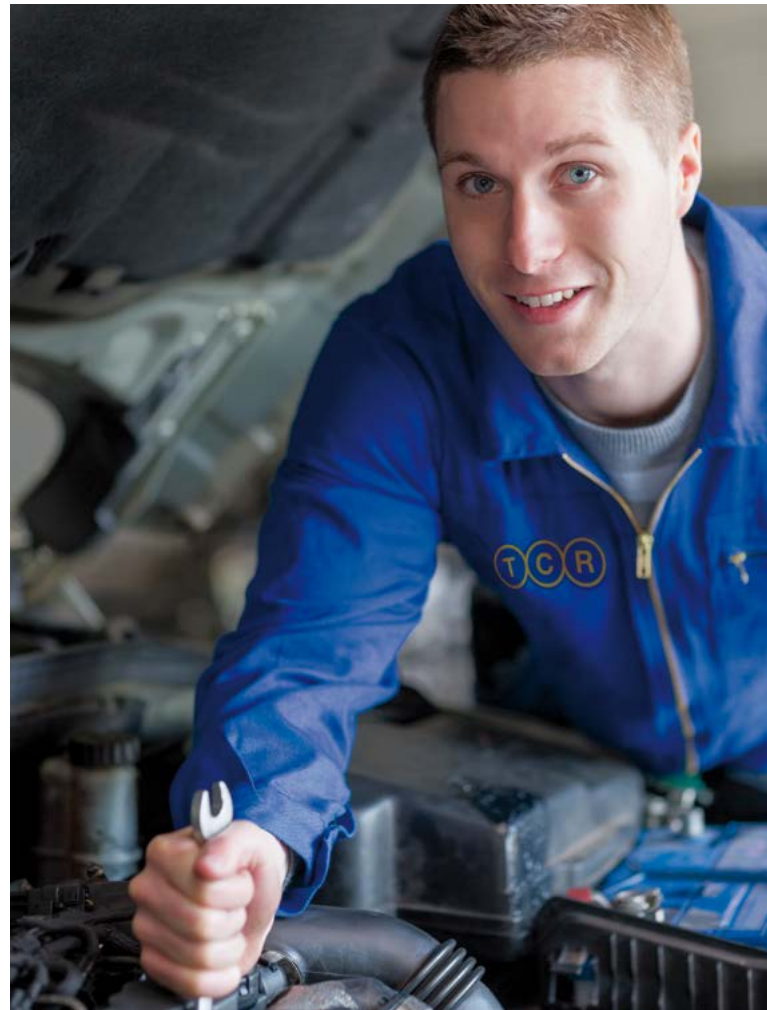
OUR PEOPLE

TCR employs over 950 staff worldwide, of which the vast majority are highly-trained technicians skilled in mechanics and electronics and directly in charge of the maintenance of GSE in workshops at airports.

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

OUR POLICIES & ACTIONS WITH REGARD TO SLAVERY & HUMAN TRAFFICKING

We recognise and consider modern slavery as a criminal offence and a fundamental breach of human rights. Whilst we do not have a formal policy on human rights, the cornerstone of our Corporate Social Responsibility (CSR) strategy is TCR's International Code of Conduct which explicitly confirms our commitment to support and uphold the principles set out in the Universal Declaration of Human Rights and the conventions of the International Labour Organisation.



TCR's International Code of Conduct clearly sets out that 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 also expects from its 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.

TCR will not tolerate any form of forced labor, slavery or human trafficking and will not accept such behaviour from its employees, customers, suppliers, GSE users, shareholders or any other of its stakeholders. New contracts with suppliers as well as our purchasing terms and conditions of GSE or spare parts for GSE contain clauses prohibiting the use of child labor or forced labor 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.

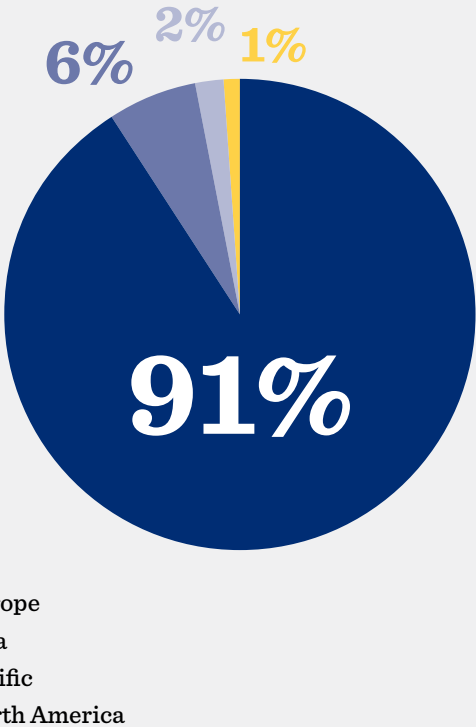
OUR SUPPLY CHAIN & ASSESSED RISK AREAS

We yearly receive goods and services from more than 5.000 suppliers. The vast majority of the principal goods and services procured by TCR, originate from Europe and relate to operations in technical industries for the delivery, maintenance and transportation of GSE, delivery of spare parts for GSE, the supply of IT and related services. At present, such supplies are not subject to human rights due diligence assessment, but we encourage our staff to remain vigilant to potential abuse with regard to modern slavery and human trafficking and to report any concerns.

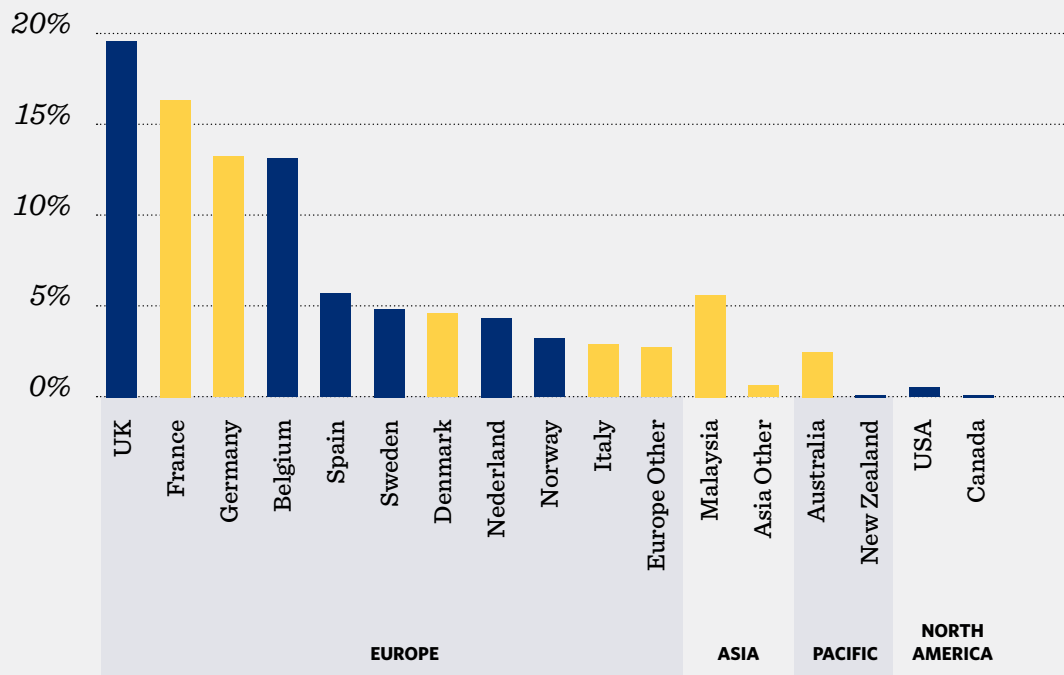
Over the financial year 2017/2018, more than 90% of the annual expenses was in Europe and more than 50% in countries (Netherlands, United States, United Kingdom, Sweden, Belgium, Spain, Norway, Portugal - marked in blue on the table page 5) ranked within the top-10 when it comes to government response rating to modern slavery (Global Slavery Index 2018), generally in activities that we consider lower risk in terms of nature of goods and services supplied: suppliers within our supply chain, that are active on the UK market and obliged to provide a Modern Slavery Statement have confirmed zero tolerance to slavery and human trafficking in such Modern Slavery Statements.

A smaller part 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). Over the financial year 2017/2018, we had a spent of almost 7% in Malaysia, of which the majority was with one supplier of GSE, being the Malaysian distributor of a very large Japanese industrial company. UK based entities of this company have as well confirmed in their Modern Slavery Statement the zero tolerance approach to modern slavery and human trafficking in their respective businesses and supply chains.

Turnover Supplier per geographical zone FY17-19



Turnover Supplier per zone and country FY17-18



A large part of our 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. In such environment, slavery and human trafficking are not tolerated.

We do not only look into the goods and services that we procure. We also acknowledge that our remarketing business (read: the sale of used GSE) also operates often in sensitive countries with regard to slavery and human trafficking. In line with our Corporate Social Responsibility (CSR) strategy, a due diligence tool was developed to support the decision making process for the sales of used GSE. This tool includes human rights as one of four specific country risks (the other risks being: corruption, economic instability and conflicts) on the basis of which we assess whether a country of final destination of used GSE is compliant with TCR's commitment to CSR and may require a due project paper with specific CSR focus that has to be presented to the board of directors before sales of used GSE can be confirmed.

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.

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. New suppliers shall accept clauses prohibiting the use of child labor or forced labor and the obligation to apply the principles with respect to the protection of international human rights and business with suppliers breaching such clauses and principles will immediately be terminated. Our current supplier contracts will be reconsidered and where high risks are detected we will enforce the appropriate contractual terms.

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 (www.tcr-group.com/corporate/csr), including a zero tolerance approach to forced labor, 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 with respect to the financial year ending on 30th June 2018.

Tom Bellekens
CEO
TCR International N.V.



Kristof Philips
Director
TCR UK Limited



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