



SUPPLIER CODE OF CONDUCT

2020

TCR International N.V and its subsidiaries (collectively hereinafter “TCR” or “we”) are committed to operate in an ethical and responsible manner, complying with fair business practices and supporting business performance in a sustainable way. Our economic success goes hand in hand with the embracement of a set of internationally recognized standards regarding environment, social impact and corporate governance (ESG).

In particular, we want our supply chain to develop sustainably and responsibly.

This Code of Conduct applies to all suppliers and service providers that do business with TCR. It outlines the standards and values TCR expects to be observed by all its suppliers. Adherence to this Code of Conduct provides one of the building blocks to our supplier evaluation process. While we appreciate and support suppliers have their own code of conduct, this Code of Conduct shall help our suppliers understand TCR’s expectations in all dealings with TCR.

Not only do we expect our suppliers to adhere to the same standards and values as those set out in this Code of Conduct, we also want our suppliers to share and promote the commitment to comply with the standards and values embedded in this Code of Conduct among their own employees and, while selecting, their own suppliers and subcontractors.

The overall objective of this Supplier Code of Conduct is driving continuous performance improvement throughout the supply chain on the basis of ESG principles and achieve TCR’s goal to be a leading service provider of airport equipment solutions.

TCR maintains due diligence processes and conducts audits to evaluate the compliance of its suppliers with this Code of Conduct. In the end, this Supplier Code of Conduct and reporting related thereto will help both TCR and its suppliers evaluating and mitigating ESG risks.

If you have questions or feedback regarding this Code, please contact your local TCR purchasing representative.



ENVIRONMENT - SUPPLIERS SHALL COMPLY WITH ALL APPLICABLE ENVIRONMENTAL, HEALTH AND SAFETY STANDARDS AND REGULATIONS

Reduce environmental impact

Suppliers shall reduce the operational environmental impact of their activities and continually look for ways to improve their environmental protection measures and to minimize the use of natural resources and hazardous materials, energy, water, waste, CO2 emissions and other greenhouse gasses.

Ensure a safe environment

Suppliers shall protect the safety and health of all their stakeholders. During the processing and creation of their products or while delivering their services, suppliers shall be caring for the health and safety of others and use products and materials of certain origin and suitability.

Suppliers that are given access to the premises of TCR or TCR's customers or other business partners are obliged to acknowledge and fully adhere to the applicable health and safety guidelines.

Manage security

TCR operates in a highly secured environment. Suppliers shall conduct their business taking appropriate measures to minimize their exposure to security threats.

SOCIAL - SUPPLIERS SHALL RESPECT HUMAN RIGHTS AND COMPLY WITH THE APPLICABLE LABOR LAW

Human rights and fundamental rights at work

Suppliers commit to respect the human rights embedded in the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organization, such as the ILO Declaration on Fundamental Principles and Rights at Work:

- Freedom of association and the effective recognition of the right to collective bargaining;
- Elimination of all forms of forced and compulsory labour, including modern slavery and human trafficking;
- The effective abolition of child labour;
- The elimination of discrimination in respect of employment and occupation.



Employment practices

Working hours and wages. Suppliers shall not force their employees to work in excess of the working hours permitted under local law. Supplier's employees shall be paid at least the minimum wage required by applicable laws.

Equality and non-discrimination. TCR does not tolerate discrimination. All suppliers are committed to providing equal opportunity in employment and shall not discriminate on the basis of age, race, religion, nationality, social or ethnic origin, gender, disability, sexual orientation, political views or union membership.

Personal Dignity. Suppliers shall treat their employees with dignity, free from any form of harsh or inhumane treatment. The use or threat of physical or sexual violence, psychological or verbal abuse, mobbing, harassment and intimidation against a worker, his or her family, or close associates, cannot be tolerated.

Health and Safety at work

Suppliers shall ensure a safe and healthy workplace, and provide to their employees a.o. appropriate personal protective equipment, machine safeguarding, fire safety and emergency response systems, adequate lighting and air ventilation, access to potable drinking water and sanitary facilities.

GOVERNANCE - SUPPLIERS SHALL COMPLY WITH ALL APPLICABLE BUSINESS AND TRADE CONTROL LAWS AND ETHICAL PRINCIPLES

Business Integrity

Anti-bribery and Corruption. Suppliers do not engage in or tolerate any form of bribery, corruption or fraud. In particular, suppliers shall not offer, promise or accept any pecuniary or other advantage for the purpose of receiving a business advantage. Suppliers acknowledge that gifts and donations in any form may mask corrupting payments. We expect our suppliers to establish and maintain policies ensuring appropriate conduct to combat corruption.

Anti-trust and Fair Competition. Suppliers shall conduct their business in compliance with antitrust and compete fairly in accordance with all applicable competition laws. Suppliers shall avoid conflicts of interest or even the appearance of such conflicts.

Fair dealing. Suppliers are expected to be honest and truthful when dealing with their business partners, including local authorities and governmental bodies.



International trade and sanctions

Suppliers shall comply with all trade laws and refrain from doing business with any persons, entities or authorities which are subject to applicable trade sanctions, export regulations or embargoes or with persons or entities that own or control such sanctioned persons or entities.

Protection of information and personal data

Suppliers shall not infringe any intellectual property rights and use confidential information in an appropriate manner.

Suppliers commit to protect all personal data that they collect from TCR or process on TCR's behalf in accordance with obligations under applicable data protection laws.

Whistleblowing

Suppliers shall enable their employees and other stakeholders to report concerns of operational or business practices that violate laws, regulations or company values and for the concerns to be properly filed, addressed and resolved. Retaliation cannot be tolerated against persons reporting such concerns in good faith.

APPLICATION

This Supplier Code of Conduct is a general statement of TCR's expectations with respect to suppliers. This Policy should be read in addition to any supplier obligations as set forth in any (i) request for proposal or quotation, or (ii) agreements by and between TCR and the Supplier. Deviations or exclusions made by the supplier to the principles set out in this Supplier Code of Conduct will be considered null and void.