



# TIP Group Supplier Code of Conduct

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**Cube Transportation Europe Coöperatief U.A.**

De Entree 33  
1101 BH Amsterdam  
The Netherlands

**T** +31 (0) 20 504 1660  
**F** +31 (0) 20 504 2313  
**W** [www.tipeurope.com](http://www.tipeurope.com)

KvK No: 71576614



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## 1. Introduction

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At TIP Group, we recognize that our procurement practices significantly impact the environment, society, and economy. We aim to integrate sustainability across our operations and supply chain through responsible purchasing aligned with our values, policies, and public commitments.

To achieve this vision, we have established a Sustainable Procurement Framework that introduces responsible procurement practices across our company. To complement this internal framework, we have created this Supplier Code of Conduct, hereafter referred to as “*Code*”, to clearly communicate our standards and expectations for sustainability performance among our suppliers.

This Code applies to all suppliers that provide any goods or services to TIP Group, including their employees, representatives, and subcontractors. We expect our partners to implement similar standards throughout their own supply chains.

This Code supports TIP Group's endorsement of international initiatives, such as the UN Global Compact, Sustainable Development Goals, and Paris Climate Agreement. It is aligned with our ESG Strategy, values, and policies related to human and labour rights, business ethics, and environmental stewardship.

By selecting and collaborating with suppliers that share our ambitions for sustainability, we aim to reduce risks, meet stakeholder, and partner expectations, comply with regulations, and build resilient relationships based on trust and shared values. Sustainability leadership requires partnership across our collective value chain.

We will regularly monitor compliance with this Code and work closely with suppliers to continually improve performance. However, failure to meet expectations may result in termination of partnerships. This aligns with our goal to grow stronger together with suppliers that embrace sustainability.



## 2. Environmental Sustainability

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TIP Group is committed to responsible environmental stewardship and sustainability across our operations and supply chain. We aim to reduce our ecological footprint by partnering with suppliers that share our environmental values and commitment to compliance, resource conservation, pollution prevention, and continuous improvement.

By working together, we can amplify our positive impact and advance innovations that will protect our planet for generations to come. We expect suppliers to comply with all applicable environmental laws and meet the standards outlined in this section. With collaboration and diligence, our collective supply chain can become a driver of solutions to pressing environmental challenges.

Suppliers should assess environmental risks, set improvement targets, and implement sustainable production and transportation practices. Suppliers should strive to reduce their environmental impact and operate in an ecologically responsible manner. At a minimum, suppliers are expected to:

### 2.1. Compliance

Comply with all applicable environmental laws, regulations, and standards in the countries where they operate. This includes, but is not limited to, requirements related to waste disposal, air emissions, water discharges, hazardous materials handling, and environmental licensing and permitting.

### 2.2. Greenhouse Gas Emissions

Measure, track, and work to reduce greenhouse gas emissions from their operations and supply chains. This includes, but is not limited to, emissions from energy use, transportation and logistics, production processes, and land-use changes. Suppliers should have policies and action plans in place related to climate change mitigation.

### 2.3. Lifecycle Impacts

Provide transparent data on product carbon footprint to enable hotspot analysis and targeted improvements. By taking a lifecycle approach across our extended supply chains, TIP Group and suppliers can maximize our positive contribution to environmental stewardship.



## 2.4. Resource Efficiency

Promote efficient use of natural resources, including energy, water, and raw materials. This can be achieved through measures like process optimization, closed-loop systems, using renewable energy sources, and technological improvements to reduce resource consumption per unit of production. Suppliers should have systems to improve resource efficiency and reduce waste.

## 2.5. Waste Management

Implement proper waste management practices focused on reducing, reusing, recycling, and recovering waste. Hazardous waste, like chemicals, batteries and electronic equipment waste, must be handled responsibly and disposed of according to local regulations. Waste should be managed according to the priority order set out by Directive 2008/98/EC of the European Parliament (*“Waste Framework Directive”*):

- (1) prevention,
- (2) reuse,
- (3) recycling,
- (4) recovery, and
- (5) disposal

## 2.6. Materials Restrictions

Not use banned or restricted substances as outlined in the Regulation (EC) No 1907/2006 of the European Parliament (*“REACH regulation”*). Suppliers should establish safe alternatives when feasible and have robust chemical management programs.

## 2.7. Biodiversity

Conduct business in a manner that protects biodiversity and preserves ecosystem health, including preventing deforestation. Examples of sustainable practices include conservation programs, reforestation projects, and protecting natural habitats surrounding operations.

### 3. Social Sustainability

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TIP Group is committed to respecting human and labour rights as outlined in the Universal Declaration of Human Rights by the UN, available [here](#), and conventions on labour rights by the International Labour Organization (ILO), available [here](#). We expect our suppliers to make similar commitments and have adequate policies, processes, and management systems in place to ensure rights are protected throughout their supply chains.

At a minimum, suppliers must meet the social sustainability standards outlined in this section. These address critical issues including labor practices, worker treatment, health and safety, diversity, and inclusion. Suppliers should regularly assess facilities and operations to identify risks, implement corrective actions, and pursue continual improvement on social performance.

By partnering with suppliers that share our values and commitment to social sustainability, we aim to have a positive influence on the lives of all people touched by our supply chain. Together with our suppliers, we can demonstrate that business success and social progress go hand in hand.

The following standards detail the minimum expectations we have of suppliers regarding social sustainability.

#### 3.1. Human Rights

Uphold fundamental human rights of all people as outlined in the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights, available [here](#). This includes principles of equality, safety, dignity, and non-discrimination.

#### 3.2. Harassment & Discrimination

Prohibit all forms of harassment, discrimination, physical or verbal abuse. Suppliers should have confidential reporting mechanisms and whistleblower protection (for more information on TIP Group's confidential whistleblower system, please see section 6.4.). Discrimination based on personal characteristics should be prohibited and should not in any way influence, or have the appearance to influence, activities including, but not limited to, recruitment, wages, promotion, or retirement policies.

#### 3.3. Diversity & Inclusion

Promote equal opportunities for historically subordinate groups such as women, ethnic minorities, LGBTQ+ people, and disabled people. Suppliers should aim to



eliminate barriers to advancement and actively pursue a diverse and inclusive workforce.

### 3.4. Lifelong Learning

Provide training and development opportunities to workers to enable continual skill building and career advancement.

### 3.5. Labour Rights

Prohibit forced, bonded, indentured, involuntary, or child labor. Suppliers must verify worker age and eligibility to work per local laws applicable in the countries they operate. No workers should be compelled to work through force, deception, or debt bondage.

### 3.6. Fair Treatment

Provide fair wages, benefits, and reasonable working hours and overtime, in compliance with local laws and industry standards. This includes on-time wage payments, breaks, days off, and paid leave. Recruitment practices should be ethical and transparent.

### 3.7. Freedom of Association

Respect the rights of workers to freely associate, organize or collectively bargain in accordance with local laws and regulations. Workers should not fear retaliation for organized activities.

### 3.8. Worker Health & Safety

Provide safe and healthy working and living conditions. Suppliers must identify hazards, ensure proper protective equipment, implement health and safety procedures and systems including incident reporting, investigations, and corrective actions.



## 4. Ethical Business

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TIP Group aims to conduct business with the utmost integrity, honesty, and transparency. We expect suppliers to embrace similar values and commitment to ethical business practices.

Suppliers must operate responsibly, build trust and fairness across the value chain, and uphold their company's reputation through ethical behavior. At a minimum, suppliers must meet the standards outlined in this section.

### 4.1. Bribery & Anti-Corruption

Prohibit all forms of bribery, corruption, extortion, embezzlement, or other improper payments made to or by employees, customers, contractors, or government officials. Suppliers should have clear anti-corruption policies, reporting mechanisms, compliance training programs, and internal controls.

### 4.2. Entertainment & Gifts

Ensure that business entertainment and gifts are never offered to a TIP Group employee or representative, or any customer or supplier of the supplier, under circumstances that create the appearance of impropriety.

### 4.3. Sanctions, International Trade Law & Export Controls

Comply with all applicable international trade control laws, customs regulations, and sanctions. This includes adhering to licensing requirements, maintaining accurate shipping and import documentation, and following reporting and record retention protocols.

Suppliers are prohibited from participating in unauthorized boycotts or restrictive trade practices. They must obtain necessary licenses for goods, services, and technology transfers, while ensuring neither their organization nor affiliates are subject to sanctions by authorities such as the EU, HM Treasury, UN Security Council, or US government. Proper screening of transactions, maintenance of accurate records, and consultation with TIP Group counsel in cases of conflicting local laws are required to ensure full compliance with export regulations.

### 4.4. Competition Law

Comply with applicable competition laws that prohibit anti-competitive practices





such as price fixing, bid rigging, market allocation, or abuse of market power. Suppliers must not enter into formal or informal agreements with competitors that unlawfully restrict free and open competition.

#### 4.5. Conflicts of Interest & Insider Trading

Disclose any actual or potential conflicts of interest such as family relationships or other situations that may improperly influence business decisions. Suppliers must avoid activities or relationships that may appear to compromise objectivity.

Suppliers must not engage in insider trading, which includes buying or selling securities based on material, non-public information related to TIP or any other company. Suppliers with access to TIP's confidential information must ensure it is used only for its intended business purpose and not for personal gain.

#### 4.6. Data Privacy & Security

Collect, process, transmit or disclose personal data in accordance with privacy laws and principles of data minimization. Only collect what is directly relevant and delete after retention period expires unless retention is required by applicable local laws.

Protect all confidential business information and intellectual property (IP) from unauthorized access, use, or disclosure. Suppliers must consult TIP Group counsel before using or disclosing TIP Group's proprietary information or permitting third parties to use TIP Group's IP. Additionally, suppliers must respect the IP rights of others and obtain necessary licenses or approvals for any third-party IP use.

#### 4.7. Cybersecurity

Implement cybersecurity controls, data protection measures, and information security standards to maintain the confidentiality, integrity and availability of systems and data. Suppliers must conduct risk assessments, employee training, access control, monitoring, and testing to prevent data breaches as well as establish business continuity plans/procedures.

#### 4.8. Accurate Records

Maintain accurate books and records reflecting all business transactions. Suppliers must not alter, falsify, or intentionally misrepresent any facts, data, or records. Financial accounting and reporting should conform to applicable regulations and professional standards.

## 5. Sustainable Supply Chain

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TIP Group recognizes that effectively managing sustainability requires looking beyond our immediate tier 1 suppliers. It is critical that we propagate responsible business conduct deeper into our supply chain by requiring our direct suppliers to implement robust sustainability practices within their own operations and supplier networks.

Our supply chain is complex, global, and constantly evolving. Issues can arise many tiers down due to unethical sourcing practices, poor working conditions, pollution, or human rights abuses. That is why suppliers must take a proactive approach to identifying, assessing, and mitigating sustainability risks across their supply chain.

Suppliers shall extend the principles and standards outlined in this Code to their direct and indirect suppliers through:

- supplier codes of conduct,
- supply chain screening,
- audits,
- responsible sourcing decisions, and
- any other measures considered appropriate by the supplier.

By assessing and improving sustainability across their supply chain, our suppliers become valuable partners in fulfilling TIP Group's commitment to sustainable business conduct.

Through collaborative engagement, we aim to increase transparency, compliance, and create positive impacts at each tier of our supply chain. Together with our suppliers, we aspire to build supply chain resilience, generate long-term value, and catalyze a race to the top on sustainability performance.

## 6. Compliance Monitoring

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TIP Group aims to build partnerships based on trust, shared values, and a joint commitment to sustainable business practices. We will work collaboratively with suppliers to drive continuous improvement. However, we will regularly assess conformance with this Code through the following:

### 6.1. Self-Assessments

Suppliers may be asked to complete questionnaires or assessments on their policies, processes, and management systems related to this Code. We expect honest and timely responses. The aim is to understand suppliers' practices and identify areas for improvement.

### 6.2. On-Site Audits

If potential violations are identified through assessments, TIP Group may request an on-site audit of the supplier's facilities and operations. Audits verify compliance and are conducted by qualified third-party auditors. We will work with suppliers to schedule audits at mutually agreeable times. The goal is to develop action plans.

### 6.3. Progress Tracking

Suppliers must address audit findings through corrective action plans and provide periodic updates on progress. We aim to build capabilities and recognize suppliers who demonstrate commitment to continuous improvement.

### 6.4. Whistleblower System

Suppliers and their employees can anonymously report unethical practices through TIP Group's confidential [whistleblower hotline system](#) without fear of retaliation. We investigate all reported concerns. The aim is to uncover misconduct and promote integrity across the value chain.

## 7. Closing Statement

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At TIP Group, we believe business success and sustainability go hand in hand. We strive to collaboratively drive continuous improvement across our operations and supply chain based on ethics, integrity, and shared commitment to positive societal and environmental impact.

This Code sets forth the standards and expectations we have of suppliers as partners in our sustainability journey. We will work together with our suppliers in good faith to build capabilities and achieve conformance. In cases of non-compliance, we will make reasonable efforts to engage suppliers on remediation before terminating partnerships. However, given the gravity of some violations, we reserve the right to terminate relationships with suppliers who violate laws or persistently fail to uphold the expectations detailed in this Code.

By partnering with suppliers that share our values and aspirations, we aim to create holistic value that serves all stakeholders - from employees to customers, business partners to communities, shareholders to society at large. We look forward to growing stronger together on our sustainability journey.

## 8. Procedural

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### 8.1. Primary Owner

The Director ESG/EHS led by the Chief Operating Officer is the Primary Owner of the Supplier Code of Conduct.

### 8.2. Secondary Owner

The TIP Legal Department led by the Chief Legal Officer is the Secondary Owner of the TIP Supplier Code of Conduct. Any questions/concerns regarding the interpretation of this document may be directed at the TIP Group Legal Department.

### 8.3. Revision History

Version	Date	Changes
1.0	November 2016	Document created and titled 'TIP Integrity Guide for Suppliers, Contractors and Consultants'
2.0	June 2022	Revised and updated to 'Supplier Relationship Policy'
3.0	October 2024	Revised and updated to 'Supplier Code of Conduct'