

ECT CODE OF CONDUCT

ECT'ers have every reason to be proud of 'their' company. We are the most important logistics interchange for container transport throughout Europe. It is the central link in the many logistical chains. This means that we provide indispensable help for countless companies and organisations to realise their commercial goals. Day in, day out.

ECT is, first and foremost, an innovative service provider. For our customers it is the quality of our service which is the decisive factor. But ECT is also at the heart of the community. And this community requires that we treat our environment with care.

It is not just our environment that imposes high standards on the way we work: we impose these high standards on ourselves. To supply quality and work carefully, we need to make safety and integrity our highest priorities. At ECT we put safety – of people and the environment – top of the list. Always. Our integrity is the product of the conduct of each and every employee, at all levels: from a temporary worker to a member of the Management Board. This means, for example, dealing effectively with the issues of giving and receiving of gifts and invitations.

We treat others as we would wish to be treated ourselves.

We act professionally and as a team.

We tackle undesirable behaviour.

We treat property, materials and facilities with respect.

This conduct we expect of our ECT'ers at every level of our company is a joint decision.

To ensure that these expectations are more than just hollow words and that these important principles are firmly anchored within our company, we drop – to continue the nautical metaphor – three anchors. These three anchors are 1) the law; 2) the ECT Rulebook; and 3) the ECT Collective Labour Agreement.

Naturally, the first anchor is the law. Our company and all our employees abide by the law. It is assumed for the purposes of this document that everyone is familiar with the law. This means, for example, that we comply with the rules governing safety at work and privacy, that we strictly adhere to relevant rules on fair competition, and that we avoid conflicts of interest and other forms of corruption.

The ECT Rulebook is the second anchor. It contains the rules drawn up with the consent of the ECT Works Council and in accordance with the Works Councils' Act. The ECT Rulebook forms part of each employee's employment contract, and therefore applies to employees of Europe Container Terminals B.V. and ECT Delta Terminal B.V.

The ECT Rulebook sets out the obligations of employees in the following areas:

- good order and safety
- working methods
- use of the ECT badge
- inspection visits
- damage to property
- found items
- distribution of publications
- duty of confidentiality

The ECT Rulebook also sets out a list of prohibited conduct binding ECT employees, such as:

- performing other work
- alcohol, drugs and/or hallucinogenic substances
- smoking
- taking goods
- smuggling, black market, theft, or embezzlement

Alongside the lists of obligations and prohibitions in the ECT Rulebook are rules and regulations governing:

- debt counselling
- complaints
- undesirable behaviour
- use of ICT facilities
- use of social media
- privacy
- whistle-blowers regulation

The ECT Rulebook describes the system of disciplinary measures followed if an employee or the company fails to comply with the rules governing the above matters.

The ECT Collective Labour Agreement (the 'ECT CAO') forms the third anchor and sets out the terms agreed between our company, FNV sector havens, and CNV Vakmensen.

The ECT CAO includes matters relating to the following areas:

- social policy
- repudiation of discrimination
- unacceptability of undesired sexual harassment
- conditions of employment
- working hours
- health & safety, welfare and the environment

The obligations imposed upon ECT and our employees by the law, the ECT Rulebook, and the ECT CAO are mandatory. Each individual within ECT must comply with these rules, as with the Code of Conduct.

ECT aims to be the best, most progressive terminal operator in Europe. We cannot achieve this without skill, quality and innovation, but just as importantly we must act with integrity.

On behalf of the Management Board,

L.C. Ruijs
CEO ECT