

Ethical Trade Policy

Introduction

- 1.1 EV Cargo¹ is committed to creating a safe, fair and socially responsible working environment.
- 1.2 EV Cargo is a signatory of the UN Global Compact (UNGC), which is the largest corporate sustainability initiative. The UNGC made a call to all companies to align strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take action that advances societal goals. This policy is based on principles 1, 2, 3, 4, 5 and 6 of the UNGC, ETI Base Code and Global reporting Initiative (GRI). EV Cargo expects its organisation, Partner Network and Suppliers to adhere to the Policy outlined below.

Employment is freely chosen

- 2.1 No one shall be held in slavery or servitude. There is no use of forced or compulsory labour, as outlined in the UK Modern Slavery Act 2015.
- 2.2 There is no human trafficking for the purposes of exploitation, which includes securing services by force, threat or deception, or securing services from children and vulnerable persons as outlined in the UK Modern Slavery Act 2015.
- 2.3 Workers are free to leave their employer after reasonable notice.

Freedom of association and the right to collective bargaining are respected to the extent permitted by local law.

- 3.1 All workers are able to join or form Trade Unions, and to bargain collectively.
- 3.2 All employers must adopt a fair and open attitude to the activities of Trade Unions.
- 3.3 Should local law restrict access to collective bargaining and freedom of association, employers must allow independent and free association and bargaining.

Working conditions are safe and hygienic.

- 4.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 4.2 Workers shall receive appropriate health and safety training, and such training shall be repeated for new or reassigned workers.

¹ EV Cargo refers to the entirety of EV Cargo Group within the United Kingdom and Global Network.

4.3 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

4.4 The company observing the Policy shall assign responsibility for health and safety to a senior management representative.

Child labour shall not be used

5.1 There shall be no use of child labour which shall be exploitative or shall jeopardise the health, safety, educational development or morals of any child.

5.2 Persons under 18 shall not be employed to work at night or in hazardous conditions. The relevant age laws of the employing country shall be respected.

Living wages are paid

6.1 Wages shall always be enough to meet basic needs and provide some discretionary income.

6.2 Wages and benefits paid shall meet, at a minimum, national legal standards or the industry benchmark- whichever is higher.

6.3 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

6.4 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission for the worker concerned. All disciplinary measures should be recorded.

Working hours are not excessive.

7.1 Working hours comply with national laws and known benchmark industry standards.

7.2 Workers should not, on a regular basis, work more than 48 hours per week.

7.3 All workers should be provided with at least one day off for every seven-day period.

7.4 Overtime should be voluntary and not exceed 12 hours per week.

7.5 Overtime should not be demanded on a regular basis.

No discrimination is practised.

8.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Regular employment is provided.

- 9.1 Employers must, unless unavoidable, provide regular employment based on a recognised employment relationship established through national law and practice.
- 9.2 Employers shall not avoid providing regular employment by means of labour- only when contracting, sub-contracting or home working arrangements or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed term contracts of employment.

No harsh or inhumane treatment is allowed.

- 10.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

No bribery or inducement is permitted.

- 11.1 No bribery, inducement or reward offered, promised or provided in order to gain any commercial, regulatory or personal advantage are permissible. Further details can be found in our Anti-Bribery and Corruption Policy.

Audits

- 12.1 Internal Audits 'announced and unannounced' will be carried out by the Ethical Trade Manager randomly throughout the year. The Ethical Trade Manager will also instruct third parties to carry out external audits regarding social responsibility (Ethical Trade). Any failings that may be identified will be communicated to the board via the Sustainability Committee and a robust Corrective Action Plan (CAP) will be implemented. Any best practice identified will also be communicated and possible shared across our partner network. These audits and reports provide assurance to EV Cargo, its customers and partner network.

Responsibility for policy

- 13.1. EV Cargo Sustainability Committee has responsibility for endorsement of policies impacting the sustainability strategy.
- 13.2. The Sustainability Committee will oversee the work of EV Cargo Ethical Trade Manager and any individuals to whom particular compliance roles and/or responsibilities have been designated.
- 13.3. The Operating Boards of each business within EV Cargo will have responsibility for effectively implementing the policy and will report any matter relating to violation of the policy to the Sustainability Committee and if of a material nature, the board of EV Cargo.
- 13.4. The policy will be formally reviewed by the Sustainability Committee on an annual basis and monitored regularly by EV Cargo Ethical Trade Manager (in particular, in response to any material changes to relevant law and procedural guidance), in order to ensure that it is appropriate, adequate and effective. Any necessary improvements identified will be implemented immediately and communicated to all EV Cargo Staff.
- 13.5. Employees and any Associated Persons of EV Cargo who are required to comply with the terms of the policy will be advised of any key changes which are made.

Speaking out (It's ok to say)

14.1 In order to provide an effective channel for reports of misconduct, EV Cargo has a dedicated online confidential Whistleblowing reporting tool/hotline via EthicsPoint, this can be accessed by following this link <https://secure.ethicspoint.eu/domain/media/en/gui/106419/index.html>. Our global colleagues also have access to the EthicsPoint hotline. Simple guidance can be followed to report any misconduct

Useful contact information:

15.1 The Ethical Trading Manager/Compliance has direct feed into the Chief Sustainability Officer of EV Cargo, who has direct links to the CEO of EV Cargo. If you have any concerns and you want to speak out, please use the contact numbers below or EthicsPoint. Your details will remain anonymous, unless expressed otherwise. Remember; it is ok to say.

Ethical Trading Manager

Email: phil.nash@evcargo.com

Signed:

A handwritten signature in black ink, appearing to be "Paul Coutts", with a long horizontal flourish extending to the right.

Paul Coutts
Chief Executive Officer, EV Cargo Global Forwarding Ltd.