

Code of Conduct

We are committed to maintaining a workplace that upholds the highest standards of ethical conduct, respect, and responsibility. Our Policy Paper outlines the principles and guidelines that all employees, contractors, and stakeholders must adhere to. By following these principles, we collectively strive to create a safe, inclusive, and sustainable environment for everyone involved in our operations. The underlying Guidelines is a short summary of those principles. the

1. Anti-Slavery:

We strictly prohibit any form of slavery, human trafficking, or forced labour. We are committed to ensuring that our supply chains are free from such practices, and we expect our business partners and suppliers to share this commitment. Slavery can include unreasonable working hours and lower pay than acceptable by international standards.

2. Anti-Bribery:

We have zero tolerance for bribery, corruption, and improper influence. We comply with all applicable anti-bribery laws and regulations, and we conduct our business with integrity and transparency. Employees are expected to report any suspicious activity or requests for bribes. Any form of inducement or unfair competition is strictly prohibited. Our employees are required to question gifts with a value above EUR 100,- and we maintain a strict travelling policy. We expect similar policy from our business partners and for our partners to adhere to all anti-bribery and anti-corruption regulations.

3. Sanction and Trade law:

Our company is committed to full compliance with all applicable sanctions, trade laws, and regulations, including those governing exports, imports, and economic sanctions. We have established comprehensive policies and procedures to ensure adherence to these laws, and we provide regular training to our employees on these matters. We expect the same level of commitment from our business partners. You are required to comply with all relevant sanctions and trade laws, including any restrictions imposed by local, national, or international authorities. Additionally, we expect that you will implement and maintain effective policies, procedures, and training programs to ensure compliance within your operations. Failure to comply with these requirements may result in the termination of our business relationship. We reserve at all times the right to stop any transaction or activity in case of possible breach of sanction and or trade law regulations.

4. Harassment and Discrimination:

We foster a work environment that respects and values diversity. We strictly prohibit any form of discrimination, harassment, or retaliation on the basis of:

- **Gender, Gender Identity, or Gender Expression:** This includes discrimination against individuals based on their gender, whether they identify as male, female, non-binary, transgender, or any other gender identity or expression.
- **Sexual Orientation:** Discrimination based on an individual's sexual orientation is prohibited.

ERP Rental

Veerweg 65
3341 LR Hendrik Ido Ambacht
The Netherlands

Email info@erp-rental.nl
www.erp-rental.nl

IBAN NL79 RABO 038 7085378
BIC RABONL2U

BTW NL8669.49.756.B.01
KvK R'dam 94956421

- Race, Colour, Ethnicity, or National Origin: All individuals are to be treated equitably, irrespective of their racial, ethnic, or national background.
- Religion or Belief: We respect the religious beliefs and practices of all individuals and prohibit discrimination based on religion or belief.
- Age: Discrimination based on age, including against older or younger employees, is not tolerated.
- Disability: We accommodate individuals with disabilities and prohibit discrimination based on physical, mental, or emotional disabilities.
- Marital Status, Family Status, or Pregnancy: Discrimination against individuals based on their marital status, family responsibilities, or pregnancy is not allowed.
- Genetic Information: Discrimination based on genetic information is prohibited.

5. Zero tolerance on drugs:

Our company maintains a strict zero-tolerance policy regarding the illegal possession, use, transportation, or distribution of drugs, on, amongst others but not restricted to, any of our vessels or within our operations. This policy applies to all employees, contractors, and any third parties, including charterers and their agents.

Given the serious legal, financial, and reputational risks associated with drug-related activities, any involvement in such activities will not be tolerated under any circumstances. If drugs are found on a vessel, in containers, or in cargo associated with a charter, we reserve the right to take immediate and decisive action, including the termination of the charter party agreement, regardless of whether the Owner is at fault.

We expect all charterers and their agents and any of our business partners in general to adhere strictly to this policy and to implement robust measures to prevent drug trafficking or related activities within their operations. Non-compliance can result in the immediate cancellation of a charter or any other business relation without any liability or compensation from our side.

6. Environmental Regulations and Commitment to Green Business Practices

We are dedicated to minimizing our environmental impact and promoting sustainable practices. We comply with all relevant environmental laws and regulations, and we strive to conserve resources, reduce waste, and prevent pollution. We actively seek opportunities to promote environmental awareness and responsible stewardship.

Our company is dedicated to fostering sustainability and environmental responsibility in all aspects of our operations. We actively seek to do business with partners who share our commitment to these values. By "green companies," we refer to organizations that prioritize eco-friendly practices, such as reducing carbon emissions, minimizing waste, conserving energy and natural resources, and promoting the use of renewable energy sources.

We encourage our business partners to adopt and maintain sustainable practices throughout their operations and supply chains. By working together with environmentally conscious companies, we aim to contribute positively to the global effort to combat climate change and protect our planet for future generations.

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7. Confidentiality Clause

Our company values the confidentiality of all business dealings; however, when it comes to matters involving drugs or illegal activities, the company reserves the right to disclose any relevant information to authorities without prior notice and without liability. We are committed to fully cooperating with law enforcement to prevent any breach of legislation, especially in matters that align with the key principles outlined in our Code of Conduct and the principles laid down in our policy paper of which a copy can be sent upon request. The integrity and safety of our operations take precedence, and confidentiality agreements may be waived as necessary to uphold these standards.

This clause ensures that the company prioritizes legal compliance and cooperation with authorities, especially in serious situations like drug-related incidents.

8. Compliance and Consequences:

Compliance with this Code of Conduct is mandatory for all individuals associated with our company and its affiliates. Failure to adhere to these principles may result in disciplinary action, up to and including termination of employment or termination of business relationships. We regularly review and update this Code to align with changing laws and evolving best practices. We expect our Principals, Suppliers and Customers to embrace and uphold this Code of Conduct and to commit to maintain ethical standards, fostering a respectful workplace, protecting human rights, and preserving the environment.



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