

trg Logistics – Anti Bribery Policy

At trg Logistics we are committed to carrying on our business ethically and in line with good business practices. This is important both to ensure we avoid unnecessary risks and to protect the reputation of the Company as a good corporate citizen. Each and every employee is an ambassador for trg and the way you behave can affect the reputation of trg both positively and negatively.

A key part of good business practices is the establishment and implementation of effective principles and programmes to ensure we conduct business fairly, honestly and transparently.

Trg sets out clear ethical principles that we expect our employees to demonstrate in dealing with colleagues and those external to the Company such as fellow employees, clients, customers and suppliers alike.

Rules to guard against bribery are a key part of achieving our principles. In this document, we outline the principles and procedures which we have agreed on and which have been approved relating to anti-bribery, which we expect you to follow. Please read the contents carefully and apply them in your day-to-day activities. If at any stage you come across something you are concerned about, or you need advice, then please raise the issue in the manner described later in the Policy. This is important and you can rest assured that you can do so at any time without fear of detriment to you.

1) Policy Statement

Without exception, Trg strictly prohibits bribery and corruption in any form.

The Company commits itself to:-

conducting our business fairly, honestly and transparently; not making or offering bribes whether directly or indirectly to gain business advantages; not accepting bribes, whether directly or indirectly to give business advantages; and developing a programme to implement and support these principles.

These are the business values by which we expect you to do business on our behalf. We explain in more detail below how these principles work out in practice.

2) The meaning of Bribery

Bribery is the most common form of corruption. Bribery involves the offering, giving, receiving or soliciting of money, a gift or other financial advantage as an inducement to do something that is improper, illegal or a breach of trust in the course of doing business. This includes any payment through a third party and a recipient acting or failing to act in anticipation of receiving a financial or other advantage.

3) Why do we adopt this Policy?

As a company we believe in following the principles of integrity, transparency and accountability. A key part of corporate integrity is complying with all applicable rules. As a company carrying out their business in the United Kingdom Trg are also directly affected by and are subject to the Bribery Act 2010 together with other legislation. This legislation imposes strict legal rules on our



trading with which we must comply. We can be caught by the Act simply because we carry out business in the UK. We can be responsible for acts of bribery committed on our behalf, by anyone acting on our behalf, even without our knowledge anywhere in the world. If you abide by the principles and procedures set out in this document both you and the Company will be able to carry on business in the knowledge that you are complying with this Act and the other legal rules which are relevant.

Any violation of this policy by an individual or entity acting on our behalf may result in disciplinary action up to and including termination of employment and termination of the business relationship. In addition you should note that the penalties for violation of the laws against bribery are harsh and include fines and imprisonment for individuals.

4) Who must follow the rules?

Anyone who conducts business on behalf of Trg must abide by these rules. This can amongst others include:-

- Employees and Directors

- Trg's subsidiaries and affiliates

- Trg's joint venture partners

other third parties who perform services on behalf of Trg. This will include consultants, agents, sub-contractors, distributors, resellers, and any self-employed workers.

5) What is expected from you?

We expect all those who are obliged to follow these rules to abide by the principles set out below (in addition to stating the principles, we also give brief examples of how these may translate into practical actions) which we all must support on a day-to-day basis. Some of these principles anticipate that we as a company will also take steps to ensure that we support you by having the right policies and procedures in place. We are fully committed to doing that and if at any stage, you have concerns about the procedures or rules we publish we would ask you to share those concerns with us so that we can address any issues raised.

The principles to which we are committed, and which you must support, are:

We will not pay or offer to pay bribes. Nor will we condone the offering of bribes on our behalf to any third party, and, in particular, public officials, so as to gain or seek to gain new business or a business advantage.

Example: The ban on bribes extends to giving any gift or financial benefit as well as obvious bribes such as an enlarged commission or secret cash payment if it is intended to induce the recipient to do something improper or illegal. The prohibition covers all bribes, but the bribing of public officials is expressly prohibited because of the particular risks this presents for Trg under applicable laws.

We will not accept bribes nor will we agree to them being accepted on our behalf in order to influence business.

Example: The ban on accepting bribes means that we will never condone underhand dealings with any customer or potential customer seeking a "favour" from Trg. Again, the ban which extends to all those acting on our behalf applies to any form of benefit which may be offered, so covers offers of lavish and unwarranted corporate hospitality as well as other forms of possible inducement.

We will avoid doing business with others who do not accept our values and who may harm our reputation.



Example: We have processes and procedures in place to ensure that we carry out appropriate checks and due diligence on all of our business partners. It is important for Trg to know who we are doing business with and to be confident of their commitment to take a stand against bribery or corrupt conduct in any form. Bribery, if proven, can taint a business's reputation but can also cause harm to business partners associated with it.

COMPLIANCE IS MANDATORY

Trg will always ensure that no employee will suffer demotion, any penalty or other adverse consequences for refusing to engage in or reporting questionable conduct. This is the case even if such a refusal might result in Trg losing long-term business. Trg must insist on strict compliance with this Policy by all employees and others to whom this Policy applies. We will not hesitate to take appropriate disciplinary action (up to and including termination of employment) against any employees who violate this Policy or breach the rules set out above in the interests of protecting our business.

Trg – Gifts Policy

Trg is committed to not receiving or giving bribes. As gifts can sometimes be disguised bribes or be misinterpreted as bribes. We must ensure that giving or receiving gifts cannot distort our business relationship, create a conflict of interest or be construed as a bribe. A conflict of interest may also arise by the giving or receiving of favours or special treatment to which no financial value can be attached. Such special treatments generally encourage a “pay-back” expectation and can distort a business relationship.

Public Statement of Commitment

Trg recognises that corruption can have a detrimental effect on society by undermining legal systems, damaging social and economical development and free and fair competition. Trg is committed to carrying on our business in an honest and ethical manner. We strictly prohibit bribery and corruption of any form. We are committed to conducting our business fairly, honestly and transparently we expect all employees and others working on behalf to adhere to our commitment. We will seek to avoid doing business with other organisations that are not committed to an anti-bribery regime. Trg takes its legal obligations under the Bribery Act 2010 extremely seriously and have implemented policies and procedures to ensure as far as we can, that all employees and others acting on the company's behalf adhere to our anti-bribery principles. It is our intention to ensure that every employee and other persons acting on our behalf behave responsibly so as to maintain compliance with the law and preserve our reputation.