



ITCO - Corporate Responsibility Code of Practice

12.01.2016

Prepared by ITCO CR Workgroup

ITCO – International Tank Container Organisation

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The Tank Container Industry in the Light of Corporate Responsibility

The tank container industry with some 450,000 tank containers in operation, links demand and supply of bulk liquids, gases and powders worldwide, supporting local and global sustainable growth. It serves in particular the chemical and food grade industry, in need of a flexible, cost-efficient, safe and responsible means of transport that reaches any place around the globe. The tank container industry covers operators, lessors, manufacturers, service providers, inspection & survey companies.

Due to the nature of the business, the tank container industry puts special emphasis on **health, safety, quality and protection of the environment**. In an industry to a large extent dealing with hazardous goods, this is crucial for sustainable success. Furthermore the tank container industry is a global industry. The detailed understanding of local differences – legally and culturally – has always been at the heart of the industry. Respectively high standards of business practices do apply.

In general the tank container industry proves its Corporate Responsibility (CR) activities through **programs, audits or certificates of SQAS, CDI, ISO, AEO, SGS, Responsible Care, nicer globe**, and many more. In doing so, the companies respect and meet interests and demands of multiple stakeholders, such as customers, employees, investors, neighbours. Beyond those programs, there are a lot of small and medium sized companies in the tank container industry that are known for taking the responsibility as entrepreneurs seriously and therefore taking care of good CR without necessarily calling it CR; for them it is just what responsible companies have to do.

The ITCO CR Code of Practice

ITCO believes that following the principles of good CR is a necessity of (business) life. Well-defined, integrated and communicated CR activities help to build trust with customers, suppliers, investors, and other stakeholders. In addition well-managed

CR increases the business success and makes companies attractive for young professionals. Therefore ITCO looks into the great variety of CR initiatives relevant for the tank container industry and has turned those findings into the ITCO CR Code of Practice. **It is an evolving document to be updated as CR matures in the tank container industry.**

In the future all member companies will be asked to sign the ITCO CR Code of Practice. With this they will commit to comply with ITCO CR requirements. ITCO will on a regular basis - announced and un-announced - evaluate the CR compliance of member companies according to defined criteria (see Appendix 1), using a short questionnaire. There won't be a constant "way up", for example due to new companies joining the organisation that partially might have to get on the level of existing members. However, ITCO believes that expressing ambitions, setting targets where possible, measuring and reporting on those in a transparent way is the key to successful CR. The ITCO CR Code of Practice is an addition to the existing **"ITCO New Membership Self-Declaration Letter"**, that highlights the compliance with some CR areas, such as the commitment to high professional standards of integrity, operation, safety, security, quality management system and compliance with all applicable regulations as well as the compliance with anti-trust competition legislation.

ITCO encourages all tank container companies to go way beyond the ITCO CR Code of Practice that can only serve as guideline for minimum requirements relevant to everybody in our industry.

ITCO believes that **compliance with the ITCO CR requirements is the minimum standard for CR in general.** For single business divisions and companies more CR aspects are relevant and need to be looked at. Furthermore it is important to note, that the ITCO CR evaluation only covers basic elements that are key for the ITCO CR Code of Practice. It is neither a kind of official audit, nor is this a replacement for any audit, test, certificate carried out by the respective official survey & inspection bodies.

The ITCO Definition of Corporate Responsibility in the Tank Container Industry

Many definitions of Corporate (Social) Responsibility, Sustainability etc. do exist. ITCO decided to use the term Corporate Responsibility and defines it as follows:

Corporate Responsibility is the harmonious balance between economic, environmental, local and ethical aspects of a business.

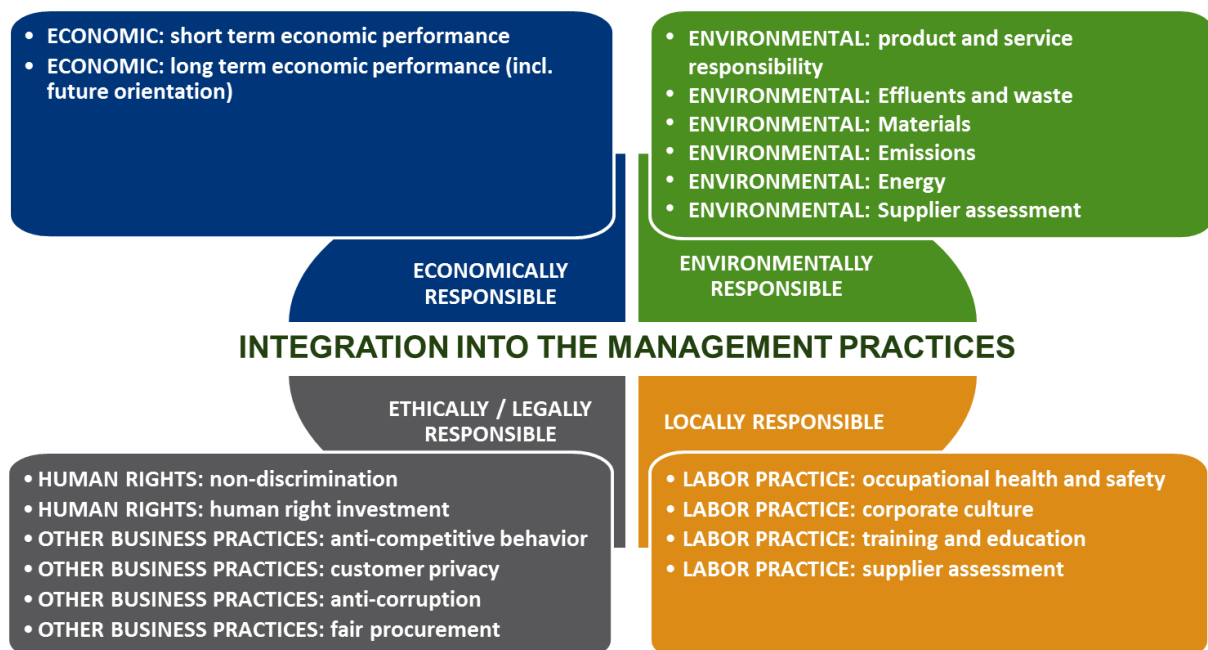
Meaning that a company:

- (a) Runs the business along the lines of short- and long term economic sustainability – **economically responsible**.
- (b) Takes care of health, safety, quality of service and material as well as the environmental impact of the business – **environmentally responsible**.
- (c) Is a good employer with good labour practices and awareness for neighbours – **locally responsible**.
- (d) Develops, communicates and implements corporate values and guidelines for human rights matters as well as other business practices – **ethically/legally responsible**.

To ensure its success CR programs should be integrated into the **management practices** of companies.

Within the defined CR areas, ITCO looked into all aspects following the criteria of the Global Reporting Initiative (GRI offers one of the world's most widely used standards for CR reporting) as well as additional industry specific criteria. All those criteria have been ranked by its relative importance for the industry as a whole. In addition ITCO looked into the various ways that ITCO members are covering those criteria in their management practices: (a) with guidelines, (b) with activities / programs, (c) through evaluation, (d) including a dialog with stakeholders.

While ITCO members do cover a huge variety of CR aspects, ITCO **identified 18 key priorities in the tank container industry**. Those are at the heart of the ITCO CR Code of Practice. They are a reflection of what is of direct relevance for all tank container companies. Nevertheless, ITCO members do appreciate all existing CR initiatives and will regularly check if the ITCO list of CR priorities should be extended or detailed.



Economically Responsible

ITCO members do **run their business along the lines of short and long term economic success**. This is in particular expressed through the future orientation, long term partnerships, sustainable growth, and innovation. In doing so, they run various programs, such as key supplier/customer programs, cost management, investments in innovative IT and products, training, etc.

- **ECONOMIC:** short term economic performance
- **ECONOMIC:** long term economic performance (incl. future orientation)

ECONOMICALLY RESPONSIBLE

However, key for the industry - and its customers in particular – is an **intact, reliable value added chain with healthy companies** and therefore

Environmentally Responsible

Tank containers are an intermodal means of transport that is re-usable, reduces the handling of cargo in transit, offers more flexibility in choosing the way of transport that has the least environmental impact, and can be almost fully recycled at the end of their 20+ years long lifetime. Most of the environmental impact happens during its usage (not manufacture, cleaning or disposal). It is the efficiency of tank containers which reduces deadhead journeys, maximises use of water and rail connections; resulting in a lower carbon footprint.

ITCO members in general do take care of a great variety of environmental aspects. Very often this is covered in certificates and audits, such as SQAS and DIN ISO 9000ff, but also through individual measurement of the number of incidents, tank recyclability, empty miles, environmental training, carbon footprint, and R&D expenditures/patents in this area. All of this depending on the role of a company within the value added chain.

For the industry as a whole ITCO identified seven aspects as being most relevant.

without insolvencies. Therefore ITCO recommends to all member companies to keep a long term perspective in mind and make use of **professional short- and long term business planning**.

To keep the awareness high, ITCO reminds its membership annually of the importance of those business processes by asking them to (re-)confirm that they have a professional short- and long-term business planning in place. In addition ITCO encourages all members to have their credit worthiness evaluated regularly by the respective institutes or agencies.

The target is (a) to have all ITCO members to confirm that they have a professional short- and long-term business planning – as applicable and useful for their business - in place, and (b) to have an increasing number of companies being positively evaluated for their credit worthiness.

- **ENVIRONMENTAL:** product and service responsibility
- **ENVIRONMENTAL:** Effluents and waste
- **ENVIRONMENTAL:** Materials
- **ENVIRONMENTAL:** Emissions
- **ENVIRONMENTAL:** Energy
- **ENVIRONMENTAL:** Supplier assessment

ENVIRONMENTALLY RESPONSIBLE

When it comes to “**Product & Service Responsibility**” the tank container industry implemented already a lot of regulations, audits, tests and surveys. Those tools are excellent ways of keeping product and service quality, safety and reliability high. Therefore ITCO demands from all members to carry out the **mandatory tank container tests** to make sure that all tanks comply with regulations and standards. All tank containers must apply to at least the requirements of the domestic markets, where the tanks are operated. On top of this ITCO measures – through the regular CR questionnaire - the percentage of tank containers in the market that apply to the international regulations (UN portable tanks specifications) and can be therefore safely operated in all countries in the world. The target is

to increase the percentage of tank container in line with international standards.

When it comes to **“Effluents & Waste”** in particular manufacturers and service providers are concerned directly. ITCO expects all ITCO members that are handling effluents and waste to have **proper handling procedures** in place and to strive for the reduction of effluents & waste. ITCO members hiring companies that manufactures, clean or maintain their tank containers should assess the suppliers accordingly. For this they should look for example into valid cleaning certificates, use of best regionally available technology on waste water treatment (“best available technology” is a combination of technical possibilities combined with economic viability), emergency response programs related to the loss of products that require treatment. In addition all companies that have tank containers cleaned are expected to provide (timely) all necessary information on the last carried product and to accept a fair local market price for waste water treatment & other environmental costs incurred “end of line”.

When it comes to **“Materials”** ITCO’s focus is on the material used in tank containers. ITCO demands that all members do their utmost to treat the material as valuable resource in manufacturing, operational and scrapping processes. Already today when scrapping the tank container **80-90% of the material can be re-used**. This is an ever ongoing improvement process that the tank container industry highly cares about as this actually also reduces costs.

When it comes to **“Emissions”** the tank container itself is a means to lower the impact that transport has on the environment. It is used for modular traffic, what allows it to be transported via road, rail, and sea. In addition the industry is constantly

looking into the **reduction of the weight of tank containers**, which results in more load per tank container and therefore can result in less transport and emission. Even when the tank is transported on the road the operators are reducing emissions by e.g. improving fuel efficiency through drivers training and vehicle fuel types. However, ITCO expects all its members to control emissions wherever possible. Therefore ITCO asks in particular operators to – out of the multiple options to operate a tank container – to **always consider operating a tank container in a way that is causes the least emissions**, meaning - next to using efficient IT based planning systems - in particular using the tank container on rails.

In terms of **“Energy”** ITCO expects member to keep their electricity, gas, gasoil, etc. consumption as low as economically possible. EU-regulations (Energy Efficiency Directive) require the implementation of an Energy Management System according to ISO 50.001 or equal standards. ITCO assumes that companies usually monitor the consumption as this also offers cost saving potential. However, the association will also ask member companies, if they do monitor energy consumption with the aim of reducing it.

In general ITCO encourages all members to have a **“Supplier Assessment” on environmental concerns** in place. Of course, to avoid duplication of effort, If for certain aspects of the supplier assessment a system like SQAS or alike is already in place, the results of this assessment are equal to re-asses individually.

ITCO asks his member annually not only for the existence of the assessment system, but also for the frequency. The aim is to have an increasing number of annual supplier assessments in place.

Locally Responsible

ITCO members strive to be a good employer and neighbour. This is the essence of being locally responsible. In doing so the focus is on cultivating good labour practices. Aspects like support of local communities is less of a focus, as this is not that close to the core business of the tank container industry, being a global industry with many locations, but usually not being very big at one single location.

LOCALLY RESPONSIBLE

- LABOR PRACTICE: occupational health and safety
- LABOR PRACTICE: corporate culture
- LABOR PRACTICE: training and education
- LABOR PRACTICE: supplier assessment

In terms of “**Occupational Health and Safety**” ITCO members should at very least strive for **zero accidents** when building, maintaining or operating tank containers. All ITCO members are asked to report annually the **number of accidents that resulted in lost time due to injured employees or were even fatal**. ITCO defines “accident” as an incident that happens unintendedly and that causes injury with absence of work for more than three days, and/or that causes serious damage to a tank container or to the environment and where the intervention of emergency services (e.g. fire department) was called upon.

While the target is “zero accidents” ITCO is well aware of the fact, that this can’t be completely influenced by ITCO members, but wants to make sure, that ITCO members are committed to the target and evaluate it. Therefore ITCO evaluates the number of ITCO members doing accident reports (target: increasing number of ITCO members providing statistics to ITCO) as well as the results of those reports.

In addition ITCO encourages all members to provide regular **health & security trainings** as well as **health checks** to employees and provide **security equipment** that prevents accidents and other not easy to detect illnesses at e.g. inner organs.

In terms of “**Corporate Culture**” ITCO believes that the tank container industry as a whole offers a very attractive work environment. On the one hand the industry is a truly global business, involving a huge variety of countries and cultures. On the other hand it is small enough to offer a trustful and warm family feeling to its staff. People working in this industry have an extraordinarily wide knowledge and expertise in tank containers, their manufacturing, maintenance and also the transported goods. This results in very little silo thinking and offers ongoing challenges and possibilities for education and development.

While ITCO has only little influence on the Corporate Culture in single companies, the association at least requires from all ITCO members to be aware of the necessity of having a positive Corporate Culture and to report to ITCO on an annual basis, if they (a) **formulated Corporate Values**, (b) believe that those are well understood within the company, and (c) if management and staff is living up to those.

In terms of “**Training and Education**” ITCO has a strong focus on ITCO members **providing training on regulations and the safe handling of tank containers** to their employees. As ITCO is a well-respected source for this kind of training and education for the industry, ITCO measures and reports the **number of participants at respective conferences and trainings** - including an e-learning tool - as well as the **downloads of respective documents** from the ITCO website.

As labour practices are key for the tank container industry ITCO encourages all members to carry out “**Supplier Assessments for Labour Practices**”. Those assessments should at least include suppliers’ confirmation that they **respect and follow the respective local law**, but should also cover the three aspects listed above as key priorities for the tank container industry. Of course, to avoid duplication of effort, if for certain aspects of the supplier assessment a system like SQAS or alike is already in place, the results of this assessment are equal to re-asses individually.

Ethically / Legally Responsible

Many ITCO members cover most aspects of their ethical/legal responsibility in Code of Conducts that they communicate internally as well as externally and act upon. ITCO emphasizes **Human Rights Protection**, focusing on “**Non-Discrimination**” and “**Human Right Investment**”; the later not only covering respecting Human Rights, but also including investment agreements and contracts that include human rights clauses or that underwent human rights screening as well as employee training on human rights policies or procedures. In addition ITCO has a strong focus on **Other Business Practices**, in particular “**Anti-Competitive Behaviour**”, “**Customer Privacy**”, “**Anti-Corruption**”, and “**Fair Procurement**”.



In addition to **respecting and following existing national and international laws and regulations** ITCO expects all member companies to respect and agree on the ITCO anti-competitive behaviour guidelines, that are handed out at all ITCO meetings as “ITCO Meeting Do’s and Don’ts” and that are highlighted in the “ITCO New Membership Self-Declaration Letter” as “compliance with anti-trust competition laws”. Furthermore In terms of “**Non-Discrimination**” and “**Human Right Investments**” ITCO expects all members to cover

Integration of CR into Management Practices

ITCO members believe that the success of Corporate Responsibility and the respective programs depends on the professional integration into the management practices of companies. Therefore the existence of well understood and followed guidelines is always only a starting point that must come along with activities / programs, dialog with stakeholders and evaluation.

In line with the meaning of quality and safety in the tank container industry, **safety/quality/issue**

those aspects in a **Code of Conduct**. Additional company **internal training** is encouraged. ITCO will ask all member companies on an annual basis to report back, if **(a) those Code of Conducts exist, and if those are (b) well communicated and understood internally**. In addition to the annual evaluation ITCO could ask member companies at any time for their Code of Conduct. The target is that all ITCO members have a professional, well understood and implemented Code of Conduct in place, covering at least the aspects mentioned above.

In case of “**Customer Privacy**” ITCO will - in addition to the coverage in the Code of Conduct - ask all member companies to evaluate on an annual basis the **percentage of Non-Disclosure Agreements (NDAs) across the customer database**.

In case of “**Fair Procurement**” ITCO points out that all potential suppliers must have an **equal right of getting the business**. The key criteria for this are normally quality, prize, availability / time of delivery. In addition the association expects that those suppliers, service partners and contractors are chosen, that accept and follow the outlined principles of good CR. At the same time ITCO expects that those parties are well treated by the clients; in particular when it comes to providing relevant health, safety, security, environmental and CR information as well as fair evaluation and feedback. ITCO encourages ITCO members to consult procurement experts in order to have this aspect well covered in their Code of Conduct.

management systems are in general well integrated into the management practices of ITCO members. This covers the core business. In addition **health management systems** are broadly in place. CR aspects are becoming an integral element of management decisions and employee incentive schemes. The “formal” work of CR – internal control bodies, memberships in CR initiatives – is slowly establishing as well.

Appendix 1: Key Priorities, Expectations and Evaluation in an Overview

PRIORITY	EXPECTATION	ITCO EVALUATION
ECONOMICALLY RESPONSIBLE		
Short- and long term planning	All members are encouraged to have a professional short- and long term business planning in place to have the basis for an intact value added chain with healthy companies.	<ul style="list-style-type: none"> Percentage of members that have short- and long-term planning in place; as applicable and useful for their business. Percentage of members that evaluate their credit worthiness and achieve good results.
ENVIRONMENTALLY RESPONSIBLE		
Product and service responsibility	All members must carry out mandatory tank container tests. Tank containers must meet at least the requirements of the domestic markets, where the tanks are operated.	Percentage of tank containers in the market that apply to the international regulations (UN portable tanks specifications).
Effluents and Waste	<ul style="list-style-type: none"> All members handling effluents and waste to have proper handling procedures in place and to strive for the reduction of effluents & waste. Members hiring companies to manufacture, clean or maintain tank containers are recommended to assess the suppliers accordingly. All companies that have tank containers cleaned to provide (timely) all necessary information on the last carried product and to accept a fair local market price for waste water treatment & other environmental costs incurred "end of line". 	All companies treating effluents & waste to confirm that they do comply with local regulations.
Materials	All members to treat the material as a valuable resource in the manufacturing, operational and scrapping process.	80-90% of the tank container material is re-used today. In this ongoing improvement process ITCO will highlight developments as they come up.
Emissions	All members to control emissions wherever possible, while focusing on operating a tank container in a way that is courses the least emissions.	In this ongoing improvement process ITCO will highlight developments as they come up.
Energy	All members to monitor and reduce energy consumption wherever economically possible.	<ul style="list-style-type: none"> Percentage of companies that monitor energy consumption Percentage of companies that report a reduction of energy consumption compared to the previous year.
Supplier Assessment	<ul style="list-style-type: none"> All members to have a supplier assessment on environmental concerns in place. If a system like SQAS or alike is already in place, the results of this assessment are equal to re-assessing individually. 	<ul style="list-style-type: none"> Percentage of companies with supplier assessment Frequency of assessment

LOCALLY RESPONSIBLE – LABOUR PRACTICES		
Occupational health and safety	All members to strive for zero accidents when building, maintaining or operating tank containers.	<ul style="list-style-type: none"> Percentage of members evaluating accidents. Number of fatal accidents and accidents resulting in absence of work for more than three days, and/or that causes serious damage to a tank container or to the environment and where the intervention of emergency services (e.g. fire department) was called upon.
Corporate Culture	All members to be aware of the necessity of positive Corporate Values.	Percentage of companies that: (a) formulate Corporate Values, (b) believe that those are well understood internally, and (c) believe that people are living up to this.
Training & Education	All members to provide training on regulations and safe handling of tank containers.	Number of participants at ITCO conferences and trainings (including e-learning tool). Download of respective documents from the ITCO website.
Supplier assessment	<ul style="list-style-type: none"> All members to carry out supplier assessments for labour practices; covering at least: (a) suppliers' confirmation that they respect and follow the respective local law, (b) the three key priorities above. If a system like SQAS or alike is already in place, the results of this assessment are equal to re-assessing individually. 	Percentage of companies having supplier assessments on labour practices in place.
ETHICALLY / LEGALLY RESPONSIBLE – HUMAN RIGHTS PROTECTION		
Non-discrimination	<ul style="list-style-type: none"> All members to cover this in a Code of Conduct (CoC)^{*1}. All members to follow laws/regulations. 	Percentage of companies that (a) cover this in Code of Conduct, (b) have it well communicated internally, (c) have it well understood internally.
Human Rights investments	<ul style="list-style-type: none"> All members to respect Human Rights All members to cover this in a CoC. All members to follow laws/regulations. 	Percentage of companies that (a) cover this in Code of Conduct, (b) have it well communicated internally, (c) have it well understood internally.
ETHICALLY / LEGALLY RESPONSIBLE – OTHER BUSINESS PRACTICES		
Anti-competitive behaviour	<ul style="list-style-type: none"> All members to cover this in a CoC. All members to follow laws/regulations. All members to sign the ITCO anti-trust competition legislation statement. 	Percentage of companies that (a) cover this in Code of Conduct, (b) have it well communicated internally, (c) have it well understood internally.
Customer privacy	<ul style="list-style-type: none"> All members to cover this in a CoC. All members to follow laws/regulations. All members to sign NDAs with customers. 	<ul style="list-style-type: none"> Percentage of companies that (a) cover this in Code of Conduct, (b) have it well communicated internally, (c) have it well understood internally. Percentage of NDAs across the customer database.
Anti-corruption	<ul style="list-style-type: none"> All members to cover this in a CoC. All members to follow laws/regulations. 	Percentage of companies that (a) cover this in Code of Conduct, (b) have it well communicated internally, (c) have it well understood internally.
Fair procurement	<ul style="list-style-type: none"> All members to cover this in a CoC. All members to follow laws/regulations. 	Percentage of companies that (a) cover this in Code of Conduct, (b) have it well communicated internally, (c) have it well understood internally.

^{*1} Code of Conduct (CoC). Synonyms: Code of Ethics, Ethical Charter, Guidelines of Good Business Practices.

Appendix 2: The ITCO CR Code of Practice for Member Companies – To be Signed

In the future all member companies of the International Tank Container Organisation (ITCO) will be asked to complete and confirm agreement with this CR Code of Practice.

[Copy and paste the text below on to your company letterhead. Then sign the declaration and return by email or fax to Patrick Hicks at hicks@itco.be or fax to: +44 (0)870 762 0434]

To: ITCO Board of Directors

The ITCO Corporate Responsibility (CR) Code of Practice for Member Companies

ITCO defines Corporate Responsibility as the harmonious balance between economical, environmentally, local and ethical aspects of a business. To ensure the success of CR the respective programs should be well integrated into the management practices of companies.

All ITCO members are asked to comply with the following requirements and accept to be asked for respective proof on a regular basis – announced and un-announced by ITCO.

Economically Responsible

All ITCO members should run their business along the lines of short and long term economic success and planning. It is key for the industry and its customers to build on an intact, reliable value added chain with healthy companies and without insolvencies. Therefore ITCO encourages all member companies to have a professional short- and long term business plan in place; as applicable and useful for their respective business. In addition ITCO encourages members to have their credit worthiness evaluated regularly by the respective institutes or agencies.

Environmentally Responsible

ITCO members in general must take care of a great variety of environmental aspects. For the industry as a whole ITCO is in particular looking into the aspects below.

“Product and Service Responsibility”: ITCO demands from all members to carry out the mandatory tank container tests to make sure that all tanks comply with regulations and standards. All tank containers must apply to at least the requirements of the domestic markets, where the tanks are operated. For tank operating across

countries international regulations - UN portable tanks specifications – do apply.

“Effluents & Waste”: ITCO expects all member companies to have proper handling procedures in place and to strive for the reduction of effluents & waste. ITCO members hiring companies that manufacture, clean or maintain their tank containers are recommended to assess the suppliers accordingly or check existing assessments (e.g. SQAS).

“Material”: ITCO’s focus is on the material needed to build tank containers. ITCO demands that all members do their utmost to treat the material as a valuable resource in the manufacturing, operational and scrapping process.

“Emissions”: ITCO demands members to continuously look into the safe reduction of the weight of tank containers, what can result in more load per tank container and less transport and emission. Next to having an efficient IT based planning system in place, ITCO asks in particular operators to always consider operating a tank container in a way that it causes the least emissions.

“Energy”: ITCO expects member to monitor and (where economically possible) reduce their electricity, gas, gasoil, etc. consumption. In general ITCO encourages all members to have a *“Supplier Assessment on Environmental Concerns”* in place. If a system like SQAS or alike is already in place for certain aspects, the results of this assessment are equal to re-assessing individually.

Locally Responsible

ITCO requires members to strive for being a good employer and neighbour. In doing so the focus is on cultivating good labour practices.

“Occupational Health and Safety”: ITCO members should at very least strive for zero accidents when building, maintaining or operating tank containers. In addition ITCO encourages all members to provide regular health & security trainings, health checks to employees and provide equipment that prevents accidents and other not easy to detect illnesses at e.g. inner organs.

“Corporate Culture”: ITCO requires from all members to be aware of the necessity of having well thought through Corporate Values and to make sure, that those are well understood within the company, and that management and staff are living up to those.

“Training and Education”: ITCO expects members to provide training on regulations and the safe handling of tank containers to their employees.

ITCO encourages all members to carry out *“Supplier Assessments for Labour Practices”*. Those assessments should at least include suppliers’ confirmation that they respect and follow the respective local law, but should also cover the three aspects listed above as key priorities for the tank container industry. If a system like SQAS or alike is already in place for certain aspects, the

results of this assessment are equal to re-assessing individually.

Ethically / Legally Responsible

ITCO expects all member companies to respect local and international laws and regulations. In addition the association believes that the following aspects should be key priorities for all members and therefore recommends to cover those in company internal Code of Conducts, that should be well communicated and understood: (1) Human Rights Protection, focusing on (a) *“Non-Discrimination”* and (b) *“Human Right Investments”*; and on (2) Other Business Practices, focusing on (a) *“Anti-Competitive Behaviour”*, (b) *“Customer Privacy”*, (c) *“Anti-Corruption”*, and (d) *“Fair Procurement”*.

ITCO expects all members to agree on and sign the ITCO anti-competitive behaviour guideline, and the ITCO anti-corruption statement. In case of *“Customer Privacy”* ITCO encourages members to sign NDAs with customers. In case of *“Fair Procurement”* ITCO points out that all potential suppliers must have an equal right of getting the business.

I am an authorised signatory on behalf of The Company:

Name:
Company:
Position:
Signature:
Date:

About ITCO, the CR Workgroup, and Contact

About ITCO

Established in 1998, the International Tank Container Organisation represents the international tank container industry to the public and to governmental bodies. With over 160 members worldwide, ITCO's mission is to promote and represent tank containers as safe, cost-efficient and flexible means of transport. In doing so, the association has a strong focus on enhancing technological and business developments for the sake of quality, health, safety, environment, and Corporate Responsibility in the tank container industry. ITCO designs the frame work and platform for the strengthening and future growth of the global tank container business. With this the association contributes to the competitiveness and success of the tank container industry.

In case of questions about ITCO, please contact:



Patrick Hicks
ITCO - International Tank Container Organisation
Suite 3 - Charter House
26 Claremont Road
Surbiton KT6 4QZ, UK
Tel: +44 (0)20 8390 0000
hicks@itco.be
www.itco.org

About the ITCO CR Workgroup

The ITCO CR Workgroup has been established in 2014 and is since then working on CR related issues that concern all ITCO members. Depending on the content of single projects and / or meetings different member companies and people are contributing.

The first project of the CR Workgroup was the development of the ITCO CR Code of Practice. The following companies contributed to its development:

Chemion Logistik, Eurotainer, Group Van Loon – ATR, Interbulk Group, MCC Tiangong Equipment Manufacturing Corporation, SGS Netherlands, Suttons International, TLS Global Logistics, Trifleet Leasing.

In case of questions about the ITCO Corporate Responsibility Program, please contact:



Tanja Laube
Laube-Unternehmenskommunikation /
Corporate Communications
Fischerstr. 30
D-82266 Inning a. Ammersee (Munich)
Germany
Tel: +49 8143 9999044
tanja.laube@laube-communications.com
www.laube-unternehmenskommunikation.de
<http://de.linkedin.com/in/tanja-laube>

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