PETERSON CONTROLUNION

Management System

How do we work within PETERSON CONTROL UNION companies?

Date: March 2022

PETERSON CONTROLUNION

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Version history

Version	*Date*	*Comment*
2018	*February 2020*	
2020	*October 2020*	*Lay out, textual adjustments* *Glossary added* *Major updates:* *§ 4 People;* *§ 7 Risk & crisis management;* *§ 7 Information Communication Technology* *§ 10 Internal Audits;* *§ 12 Finance;* *§ 13 Corporate affairs*
2022	*March 2022*	*Major updates* *§ 1 Introduction B structures + new annex* *POG is replaced by ELT (Energy Logistics Team)* *Sharenet is replaced by SharePoint*

Additional information

The Royal Peterson Control Union Group (**PCU**) is a group of entities with PPF Participatiefonds B.V. as ultimate holding entity.

All documents and annexes referred to in this PCU Management System can be found on the PCU SharePoint / Quality & Safety Channel / 01. Peterson and CU management systems.

The PCU Management System is approved by the Group MT on 3rd March 2022.

Questions, remarks of suggestions for improvement can be addressed to rctteam@PCUgroup.com

GLOSSARY

4th party concept	Fourth Party Logistics, popularly known as 4PL, is the outsourcing of logistic operations to a single partner. This partner will be responsible for assessing, designing, building, running and measuring integrated supply chain solutions for the client.
Accreditation	The action or process of officially recognizing someone as having a status or being qualified to perform a particular activity.
CU	Control Union
Dare to Care	Internal Sustainability Strategy for the PCU Group
Director	The managing director of a legal entity. This can be on a local, regional or corporate level.
ELT	Energy Logistics Team
GDPR	General Data Protection Regulation, this increases privacy for individuals and provides regulatory authorities greater powers to take action against businesses that breach the law.
Group MT	Group Management Team of PCU, being the highest management level within PCU
Group ICT	Supporting team, responsible for the ICT policy within PCU.
HR	Human Resource Management (HR policies, training, safety and work conditions). This can be on a local, regional or corporate level.
ISO 09001	Certification scheme ISO 9001:2015 Quality management systems ("QMS").
ISO 14001	Certification scheme ISO 14001:2015) Environmental management system.
ISO 14065	Accreditation scheme ISO 14065:2013 Greenhouse gases — Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition
ISO 17020	Accreditation scheme ISO/IEC 17020:2012 Conformity assessment — Requirements for the operation of various types of bodies performing inspection
ISO 17021	Accreditation scheme ISO/IEC 17021-1:2015 Conformity assessment — Requirements for bodies providing audit and certification of management systems
ISO 17025	Accreditation scheme ISO/IEC 17025:2017 General requirements for the competence of testing and calibration laboratories
ISO 17065	Accreditation scheme ISO/IEC 17065:2012 Conformity assessment — Requirements for bodies certifying products, processes and services
ISO 27001	Certification scheme ISO/IEC 27001:2013 Information technology — Security techniques — Information security management systems

LATAM	Latin America
Management System	The management system of PCU, but also division specific (such as Peterson, Control Union, ELT) or even activity specific (such as Control Union Certifications).
Management Team	The managing team of a legal entity, representing all important organizational functionalities within an entity. Is chaired by the director. This can be on a local, regional or corporate level.
PATTS	Peterson Academy Trainees Transferees & Students. Internal Trainee program of PCU Group.
PCU	Royal Peterson Control Union Group - The whole group of companies which operate under the management of the Peterson Control Union Group MT
POG	Peterson Offshore Group, now Energy Logistics Team (ELT)
Projects and Solutions	Peterson Services, a separate division within PCU that deals with advice, support and control activities of mainly sustainability-related topics for third parties. These activities are separate from our accredited activities, in order to avoid any conflicts of interest.
PSO	PSO Beheer B.V. : Global overhead organization of the PCU Group (Finance, IT, Legal, RCT, group management.)
PSS	Peterson Supporting Services B.V. - overhead organization for just the Dutch PCU companies
RCT Team	Combination of The Global RCT Core Team, Global RCT Staff and Regional RCT Teams.
Regional MT	Management Team for regional management of the following regions: Asia (including the Pacific), Americas & EMEA) and ELT shall be considered a separate region for all purposes.
SharePoint	PCU Intranet, previous known as Sharenet, https://pcugroup.sharepoint.com/sites/sharenet
Supervision(-tool)	Quality & Safety toolbox on PCU SharePoint. Facilitate stakeholder's analysis, compliance, competence management and risk assessment
Teams channel	Private channel in Microsoft Teams which is only accessible to team members.
TIC	Testing, Inspection and Certification activities

1. INTRODUCTION

A. THE PCU MANAGEMENT SYSTEM

The PCU Management System applies to all companies that are part of PCU (as group company and/or subsidiary) and to those parties who use one of the PCU brands or PCU trademarks. Deviations shall be discussed with the Group MT.

The PCU Management System is a framework used to represent PCU common values and PCU basic management requirements. It is intended to increase efficiency and coordination within PCU, but also to stimulate entrepreneurship. The PCU Management System, which complies with the ISO 9001 standard, is for internal use only. Additional quality/management systems implemented within PCU connect to the PCU Management System.

As PCU operates in a very dynamic working field that is also developing at a rapid pace. It is impossible for our procedures and guidelines to always fully reflect this reality, let alone future developments. It is clear that all entities within the PCU group are unique, e.g. from the size of the organisation, the complexity of the local markets or services, experience of the team and management. It will not always be possible for each entity of the PCU Group to fully and directly meet the requirements of this management system.
It is therefore important that each entity strives to meet the intentions of this management system to the best of its ability and has the ambition to develop further to this level.

Importantly, the local managing director is and remains accountable for the performance and decisions taken within his organisation. A managing director must be able to explain this to the relevant stakeholders. <u>All employees</u> should be aware that they must not discredit PCU.

B. THE COMPANY

PCU is a logistics, quality, and risk management specialist with a global presence. CU and Peterson offer among others inspection, laboratory and certification services to facilitate trust in global trade. CU and Peterson certificates are recognized by authorities in almost every country in the world. Peterson and Energy Logistics are specialized in Fourth Party Logistics services to create added value solutions for commodity chains and the energy industry, both onshore and offshore. The 'Projects and Solutions' team supports (global) clients with responsible sourcing.

PCU has in-depth knowledge of, and experience in all aspects of the logistics chain of many commodities, including agricultural products, minerals and chemicals, as well as the upstream oil and gas industry. Due to the network structure within the PCU Group, local offices can, in most cases, offer the services of other offices to local offices, although **additional agreements are necessary for accredited or recognized activities!** Please contact first your relevant colleagues before offering these services of other PCU entities to your clients, to ensure you comply to all relevant standards.

Hierarchical structure

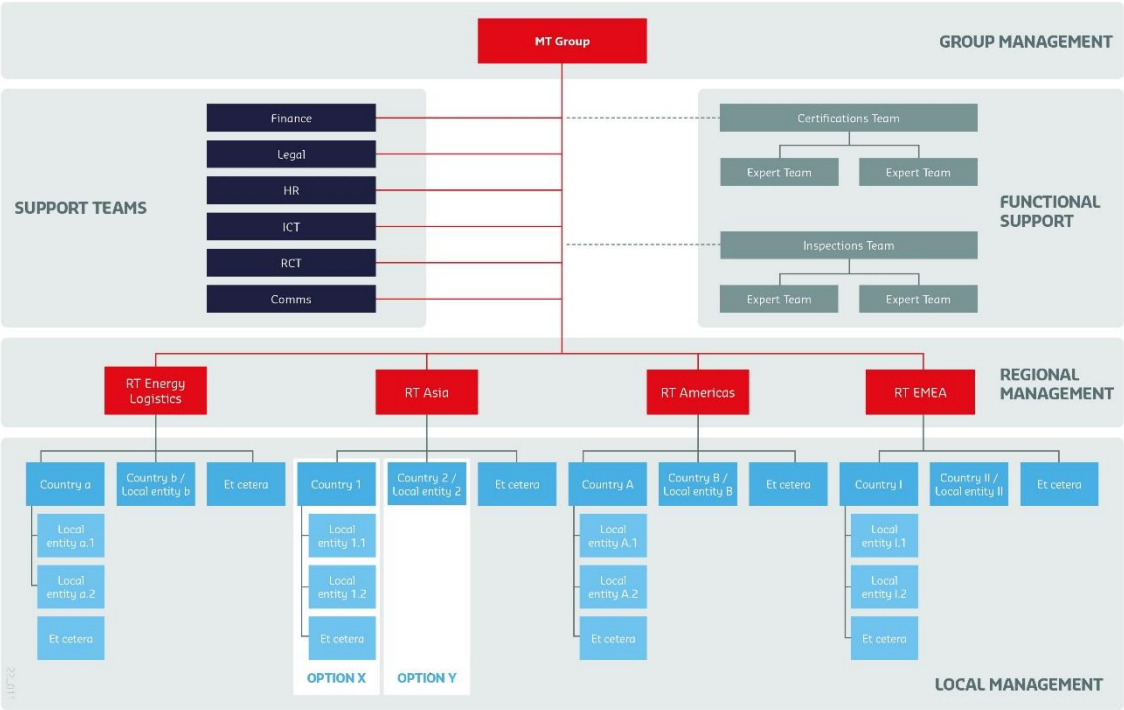

Figure 1 Hierarchical management structure PCU Group

PCU has a management structure, further supported by functional support and support teams.

Where an entity is accredited or is a recognition holder to perform TIC activities (hereinafter: L1 entity), a different line of authority applies. The L1 entity must be able to demonstrate that its services are undoubtedly conducted objective and impartial, and that consistency and competence are maintained to ensure the integrity of decisions its take. The authority regarding decisions on key activities explicitly falls to the management of the L1 entity. L1 entity key activities are explained in annex 01c Definitions L1 key activities .

Senior group management of an L1 entity respects this and shall refrain from interfering in the L1 entity services. Senior management has the right to question the L1 entity on its effectiveness and economic and legal relevance of its operation.

Legal structure

In principle, the so-called Testing Inspection and Certification (TIC) activities are separated from non-TIC activities within the PCU Group. This is to avoid (the appearance of) possible conflicts of interest.

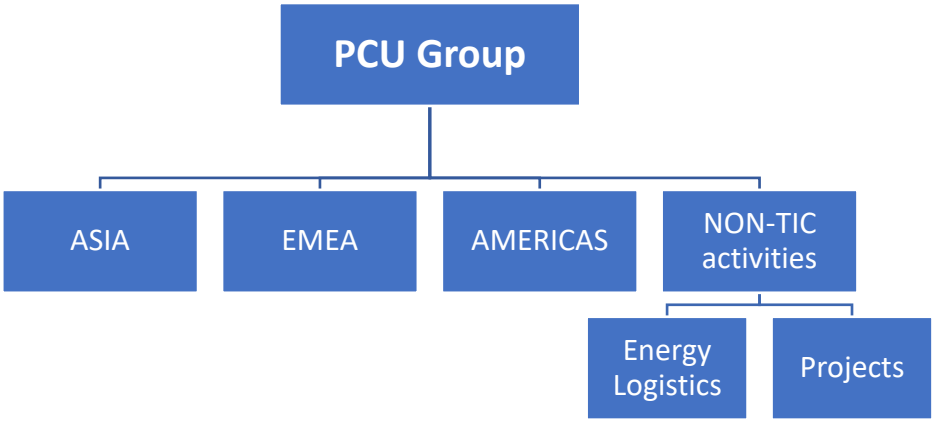

Figure 2 A simplified overview of the legal structure of PCU.

C. MANAGEMENT

PCU is a decentralized organization. Within the framework of the PCU Management System, the group companies are responsible and accountable for their business performance and entrepreneurship. Multiple management teams are operational within PCU and are described in Annex 01a Management Structure.

There are several teams active for clusters of services and/or subjects. These are the PCU functional teams and they decide on marketing, service development, staff requirements, operational aspects and internal coordination.

For all group companies of PCU one or more directors are appointed, see also Annex 13a Company Regulations. The group companies operate independently within the framework of the PCU Management System.

D. PRESENTATION

PCU present itself as a modest service provider. Most clients appreciate that PCU does not show off (cars, flights, gadgets, venues) and that functionality prevails.

Contact with the press and media: technical promotions are allowed in the press and media, but if the contact should carry any other type of message, it should be agreed upon beforehand with the regional management team and/or a Group MT member.

PCU operates under different brand names such as Control Union and Peterson. Offers, contracts, certificates, reports and letters are always in the name of, and signed by, the individual company on their own letterhead.

For certain clients or occasions, it may be useful to act under the name "PCU", this is to be decided by the managing director of the relevant group company (see below under E.). It should be made clear that business is always done with the individual group companies and not with holding companies. Within PCU "parent guarantees" (or similar constructions under applicable law) are not allowed.

Once a year, a company profile for PCU is published with an update of PCU services and the key financial data. This company profile is for limited external distribution only, and distribution is subject to approval of the Group MT.

E. CORPORATE IDENTITY

The use of the name and combined logo of PCU is limited, mainly for internal purposes:

- Business cards for the Group Management Team and staff involved with Group matters, such as human resources, finance, legal, risk, compliance & trust (RCT) and information communication technology (ICT);
- Mailings from Human Resources, finance or ICT management to PCU employees;
- Company Profile.

Corporate identity manuals (called 'Style Guides') apply for PCU and can be found on PCU SharePoint > Communications > Most Relevant Documents.

A description of PCU in 50, 100 and 150 words can be found in Annex 01b Peterson and Control Union in 50_100_150 words.

2. MISSION, VISION AND CONTEXT

The Group MT believes that it is important to have a common mission and vision. PCU strives to be a hands-on company, which is reflected in the mission and vision alongside the context of why PCU exist and will exist in the future.

We trust our employees to have the best interests of PCU at heart. Where no specific policy, procedure or instruction is available, our employees should perform their tasks within the core values, mission, vision and guidelines of PCU. In case of doubt, they shall consult their supervisor. By giving our employees frameworks within which, they can work, senior management expects us to be able to continue to serve our customers even better, in line with the intentions of PCU.

In Annex 04a Our philosophy, it is further described what the PCU stands for and what PCU aims to be.

A. MISSION

PCU mission statement:

PCU is a global network of independently operating service companies.

PCU activities include logistics, inspection and certification of a mix of agricultural, food, mineral, energy and other products like textile.

PCU core values are honesty, integrity, safety, entrepreneurship and respect for people, society and environment.

PCU offers services in a safe, reliable, cost effective and independent manner at the highest possible level, while offering good conditions to PCU employees.

B. VISION

PCU VISION STATEMENT:

PCU aim to respond to increasing requirements for sustainable business and to add value to PCU clients' activities through innovative solutions in the PCU lines of expertise.

PCU promotes transparency to improve compliance, efficiency, risk management and internal integration as well as the trust of PCU clients.

PCU consolidates the PCU market position and focus on the further development of integrated services to increase PCU profit.

PCU acknowledges the vital importance of human capital and pay continuous attention to safety, quality, competence and continuity.

C. CONTEXT

Since 1920 we provide clarity and trust for sustainable and reliable supply chains.

PCU has a own global network, present on all continents with own offices in more than 75 different countries. Each PCU office is active with one or more activities in one or more markets.

It is important to assess PCU relevance in the current market as well as in a future, changing world. PCU main stakeholders are clients, employees, shareholders, governments, suppliers, competitors, neighbors, schools, society and representations such as NGO's.

What do stakeholders expect from us? Assessing the context in which PCU operates is dependent on PCU activities and the countries in which PCU offices are located. The tool "Supervision" is available in the Quality & Safety toolbox on PCU SharePoint to facilitate this stakeholder analysis and compliance with requirements and risk assessment. This analysis provides important input for the management review and the objectives.

3. ETHICS & COMPLIANCE

A. WHY?

PCU's product is trust, honesty, integrity and reliability It is important to be constantly aware of this, and in conflicting situations it is vital to act fast and adequately

B. RESPONSIBILITIES

Director: sign and promote the PCU code of conduct, implementation and follow-up of the ethics and compliance requirements, appoint a compliance officer, make the yearly compliance declaration.

Employees: sign the PCU code of conduct, participate in the ethics/compliance system, input and report (suspected) violations.

C. EXECUTION

1. Introduction

1.1. PCU provides trustworthy services to the clients in the areas of inspection, certifications, logistics and other related services.

1.2. The ethical behavior of all PCU employees is of vital importance to PCU performance and PCU success in business.

1.3. Business must be done in a way that conflicts of interest, pressure on integrity, bribery and unfair marketing are prevented. The word "compliance" is used in this respect.

2. Code of Conduct

2.1. The code of conduct applies to all PCU companies and their employees. The PCU code of conduct can be found in Annex 03a Code of Conduct

2.2. All employees sign the code of conduct. In countries or situations where labor contracts are not common, the code of conduct must be signed by employees to ensure ethical behavior and confidentiality.

2.3. The code of conduct must be explained and made available to all employees. Employees' knowledge of this code must be regularly updated by training and work meetings.

2.4. The major aspects of ethics/compliance are subject to internal audits and reported on in the management review, with the compliance declaration being signed by the director.

3. Employees

3.1. Employees will not suffer demotion or penalty arising from their strict adherence to the code of conduct.

3.2. Employees are invited to provide input about ethics, for example during work meetings or assessments.

3.3. Employees are encouraged to report ethics violations or suspected violations. The director appoints a contact person / compliance officer.

3.4. Family members are only employed with approval of the relevant management team

4. Violations

4.1. Ethics violations or suspected violations are investigated, the persons involved will be given the right to be heard.

4.2. The relevant director decides on corrective and disciplinary actions and, in case of serious violations, the relevant management team may be involved.

4.3. In some countries, local legislation on whistleblowing and protection of involved staff is applicable.

4.4. In case the local management is suspected to be involved in non-compliant activities, this can be reported to the relevant management team without informing the local management.

4.5. The ultimate reporting channel is (the chairman of) the Group MT.

5. Business

5.1. All relevant subcontractors and joint venture partners must sign the code of conduct.

5.2. Prior to commencement of new services, new operations or business ventures in new countries, due diligence checks must be done covering all major aspects of ethics & compliance.

5.3. Gifts, contributions, hospitality and expenses to an individual are acceptable to a maximum of EUR 100 per client/year, when they do not compromise the integrity of PCU.
The Regional Management Team/ Group Management Team may decide on or allow for exceptions.

4. PEOPLE

A. WHY?

Motivated and competent staff is essential for the success of PCU . Employees must be offered a good and safe work environment and opportunities to improve and develop themselves and PCU .

B. RESPONSIBILITIES

Director and/or senior staff: good employment practices: hold work meetings, conduct assessments, offer training & development, stimulate engagement, ensure safety and good work conditions/environment.

HR (Human Resources): create and maintain HR policies, training & development, ensure good work conditions/environment.

Employees: good employee practices: show initiative, attend and participate in work meetings, conduct assessments, follow trainings and ensure a safe and good work environment.

C. EXECUTION

1. Attraction

1.1. PCU aims to be a good employer by supplying decent and fair work conditions, training, challenges and opportunities aligned with the PCU statements and by respecting the labor laws of the country of employment.

1.2. Fair and equitable treatment will apply to all aspects of employment including but not limited to recruitment, selection, placement, training and development, promotion, compensation, benefits, termination and work environment.

1.3. Attracting talent starts with a professional job posting. Guidelines for drafting a good job advertisement are available on the HR page \attraction on PCU SharePoint \ HR \ Documents.

2. Hiring

2.1. Hiring is done by the HR team or representative in consultation with the director or senior staff members; the candidate's qualifications must be in conformity with the requirements of the job.

2.2. There are job descriptions present for most of the positions within PCU.

2.3. An interview guideline is available on PCU SharePoint \ HR \ Documents \ Hiring Toolbox for structuring interviews with candidates. Moreover, it can assist in increasing the validity, reliability and outcome of the interview.

3. Induction & Onboarding

3.1. New employees are informed about the PCU management system, including the Code of Conduct. A signed and dated copy of the Code of Conduct will be kept at the personnel file of the employee. Code of conduct shall be provided in English and could be translated locally.

3.2. Induction & Onboarding guidelines are available on PCU SharePoint \ HR \ Documents \ Induction and Onboarding.

3.3. In the first weeks after their appointment, the new employee receives a proper introduction to PCU and colleagues.

3.4. Assignment of a buddy is recommended: to assign a colleague as the informal go-to person for the new employees during their onboarding period.

4. Training & Development

4.1. PCU work activities must be carried out by qualified and competent staff. The required qualifications and competence must be determined, monitored and maintained. 'Supervision' includes qualifications and competence management which can be used. A 'Supervision' site is available or will be made available on request for every PCU office but must be configured to meet the local requirements.

4.2. Initiatives by employees to improve business are appreciated and encouraged.

4.3. For specific certifications and accreditations, additional qualification requirements and competence management may apply.

4.4. Training is a continuous effort and individual training initiatives should be encouraged. The director or senior staff decide on specific (also general) training needs, this can be internal or external training. As member of the HR team, the Global Training Coordinator has a key role in the organization and planning of global and regional training events as well as in the structuring and development of course/training tools. https://elearning.PCUgroup.com/

4.5. Objectives for training are reported on in the management review, training sessions must be attended regularly.

4.6. Job rotation is a form of training as well. Rotation can be done within the office and within PCU . Requests for job rotation in PCU go via the director or management team.

4.7. (Internal) job opportunities are posted on PCU SharePoint \ HR \ Vacancies

4.8. A traineeship program exists within PCU , called PATTS. Candidates are recruited with the job global graduate program. Employees can also enter this program. Requests for participation in this program go via the director, who contacts the global HR team.

4.9. As a global company, English is the common language to be used. English lessons and the improvement and use of that language should be promoted in every country.

5. Assessment

5.1. All employees are assessed at least once a year; more frequent assessments are considered a good practice, hence encouraged.

5.2. The 'Performance Review Form' is a guideline for this purpose and can be found in Annex 04b Assessment format. For the performance review we use a 3-point scale: below expectation, in line with expectation and above expectation.

5.3. Assessments are important to the success of PCU , to support motivation, to ensure a good work atmosphere, to enhance communication and improve the quality of the work. Training for assessments is facilitated by the Global HR team.

5.4. Assessments should be done by the immediate supervisor. Assessments must be well planned and properly announced, enabling the employee to prepare. It is suggested that the employee submits subjects for discussion prior to the assessment.
To ensure a fair assessment of the work done by a family member, they should never assess each other. This should instead be done by the immediate superior of the highest ranked employee.

5.5. Assessments should only stick to the facts and deal with the individual employee. Open communication and a comfortable setting during the assessment will enhance its efficiency.

5.6. At the closure of the assessment, clear and objective conclusions should be agreed upon and registered on the form.

6. Safety & Welfare

6.1. Safety is priority number one: therefore, the subject has been integrated in a separate chapter of this manual (see Chapter 6: Health, Safety, Environment & Quality).

6.2. Prevention of accidents is everyone's concern. It is the duty of all employees to work in such a manner as to ensure the safety of themselves and others, and to co-operate with management on matters relating to health and safety.

6.3. Safety instructions and guidelines apply everywhere in PCU, depending on the location of job execution. Employees are always urged to work to the highest appropriate standards of safety and to familiarize themselves with relevant local regulations.

6.4. All necessary safety equipment is supplied by PCU and kept up to date. The employee also has a responsibility to keep gear well-kept and functional.

6.5. Safety training should be supervised, audited and evaluated on a frequent basis.

6.6. Emergency contact details must be available in the office (coordination department).

6.7. When traveling for business, hotel and flight details must be available in the office (coordination department). It is useful to have an emergency phone number of your embassy with you.
The policy within PCU is that travel insurance is no longer taken out. Expenses arising from business travel, including medical, repatriation, or lost property compensation that would otherwise be covered by travel insurance, are now reimbursed internally by the PCU company employing the employee.

6.8. A good and safe work environment is important: clean, tidy, enough space, decent temperature and light and noise must be within acceptable levels. Additionally there should be sanitary facilities, smoke detectors, emergency exits, emergency lights etc.

6.9. Often the condition of the work environment is not in PCU hands, as PCU employees work at facilities controlled by others. PCU influence to improve the work environment in those cases is limited, it may help to involve the PCU client. Safety issues must never be compromised on. Therefore, PCU employees have the authority to stop the job if it is unsafe to continue, as mentioned in the Code of Conduct.

6.10. Equal opportunities are provided to all employees, with respect to all aspects of employment and business practices. Employees must act with integrity, fairness and respect, regardless of their differences.

6.11. Discrimination, sexual harassment, aggression, bullying and violence in the workplace are unacceptable. An aggrieved employee can rely on the local policy, which can be found in the working regulations / employee handbook. If there is no local procedure available, the violation procedure in chapter 3, clause 4 can be adopted. The employee should contact the HR team at HRglobal@onepeterson.com if there is no other means to report or if they are dissatisfied with the outcome at the local level.

7. Engagement

7.1. Committed employees are important to PCU .

7.2. Various engagement initiatives are devised at global/ regional/ local level to enhance commitment and to create an inspiring work environment.

7.3. Employees are encouraged to participate and give suggestions for the betterment of engagement initiatives.

7.4. Employee Surveys are held regularly and the outcomes are used as input for PCU to build on.

7.5. PCU will communicate on a regular basis with its employees.

8. Reward & Recognition

8.1. Remuneration is reviewed on an annual basis.

8.2. Remuneration revisions consider the performance of the employee, job role, the performance of the department/division/company, inflation, market / local rates and industry standards.

8.3. Other (local) initiatives to appreciate outstanding performance are up to the regional Management Team to decide.

9. Place of work

9.1. Working from home / remote working is possible, it's up the senior management to decide about the possibilities of remote working/working from home.

10. Leaving PCU

10.1. When an employee decides to leave PCU , a notice should be given in writing to the immediate manager.

10.2. All company properties must be returned.

10.3. All employees leaving PCU due to resignation / termination / retirement should be encouraged to share their experience during an exit interview. The procedure and form can be found on SharePoint \ HR \ Documents \ Exit

11. Privacy policy

11.1. PCU is committed to protecting the privacy and security of personal data. PCU Privacy Policy that can be found on SharePoint \ Infosec \ Documents \ General Privacy Policy fully describes how PCU collect and use certain information about PCU employees during and after your working relationship with PCU, in accordance with data protection legislation. It applies to all current and former employees, workers, temporary and contract workers, independent contractors, consultants, professional advisers, secondees and interns.

PCU complies with the General Data Protection Legislation ("GDPR") and corresponding local legislation where applicable. The personal data PCU hold must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that PCU have clearly explained and not used in any way that is incompatible with those purposes;
- Relevant to the purposes PCU have explained and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes explained;
- Kept securely.

11.2. Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are special categories of more sensitive personal data which require a higher level of protection.

11.3. PCU will only use PCU employees personal data when the law allows us to. PCU needs to process data to enter into an employment contract with and to comply with our contractual obligations, for example, processing salary payments and liaising with pension providers. PCU also needs to process personal data in order to comply with legal obligations, for example, health and safety obligations, reporting salary and tax data or payment of maternity pay.

11.4. PCU also needs to process personal data to pursue its legitimate business interests.

11.5. Where PCU relies on legitimate business interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees and has concluded that they are not.

11.6. Where PCU process special categories of personal data, such as those relating to your ethnicity, religious beliefs, sexual orientation, disability or gender identity, this is done for the purposes of equal opportunities monitoring.

11.7. PCU will only collect information about criminal convictions if it is appropriate given the nature of the role and where PCU are legally able to do so. PCU will use information about criminal convictions and offences in order to ascertain your suitability for a specific role or task.

11.8. Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

11.9. PCU will only use your personal data for the purposes for which PCU collected it, unless PCU reasonably consider that PCU need to use it for another reason and that reason is compatible with the original purpose. If PCU need to use your personal data for an unrelated purpose, PCU will notify you and PCU will explain the legal basis which allows us to do so.

11.10. PCU will only disclose information about you to third parties if PCU are legally obliged to do so or where PCU need to comply with our contractual obligations, for instance PCU may need to pass on certain information about you to the relevant pension scheme.

11.11. PCU takes the security of your data very seriously, and has internal policies and controls in place to try and ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

11.12. PCU will only retain your personal data for as long as necessary to fulfil the purposes PCU collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

11.13. Your personal data will be stored throughout your employment at the PCU, and for a period after you have left PCU's employment. Some types of data, such as pensions and records relating to health and safety and similar matters, may need to be retained indefinitely.

11.14. In some circumstances PCU may anonymize your personal data so that it can no longer be associated with you, in which case PCU may use such information without further notice to you. Once you are no longer an employee, worker or contractor of PCU, PCU will retain and securely destroy your personal data in accordance with our data retention policy.

11.15. It is important that the personal data PCU hold about you is accurate and current. Please keep us informed if personal data changes during the working relationship with PCU.

11.16. As a data subject, under data protection legislation, you have various rights in relation to your personal data.

11.17. In most situations PCU will not rely on your consent as a lawful basis for processing your data. If PCU do request consent to process data for a specific purpose, you are under no obligations to provide consent and retain the right to withdraw that consent at any time. This will not affect the lawfulness of processing before your consent was withdrawn.

Questions regarding the processing of personal data or accessing any of the rights as a data subject can be sent to privacy@onepeterson.com

5. CLIENTS

A. WHY?

Clients must always be the focus of PCU employees, both PCU existing clients and potential new clients. Are they satisfied with PCU services? What are the opportunities to improve, add value and innovate?

B. RESPONSIBILITIES

Director and/or senior staff: marketing, offers, maintaining contacts with the clients, business development, innovation, contacts with other PCU offices, handling of claims, monitoring invoicing and debt management.

Employees: maintaining contact with the clients on an operational level.

C. EXECUTION

1. Introduction

1.1. PCU companies are service providers, so the clients must always be PCU employees' focus.

1.2. Service providers need to be modest. Most clients appreciate that PCU is up to date, but that PCU employees do not show off.

1.3. PCU employees must be proactive and listen carefully to the clients and the markets, often they present PCU with opportunities. It must be clearly understood what the client expects from us. It is better for PCU employees to ask questions rather than simply assuming that they understand.

1.4. PCU employees must be realistic about what PCU sells.

1.5. PCU must promote being selected by the quality and other conditions of PCU services, and avoid being selected on rates only, as much as possible.

1.6. PCU colleagues can also be clients in some cases, and they should be treated as such.

2. Contacts with clients

2.1. A personal relationship with PCU clients is important, the client must not be anonymous.

2.2. Personalize services and contacts as much as possible. Instead of sending one mail to one group of clients, it is better to send the same mail separately to each client.

2.3. With the bigger clients it is good to have contact on different levels, e.g. PCU operational staff with the client's operational staff, PCU administrative staff with the client's administrative staff.

2.4. Brainstorm sessions with clients for business development and improvement coupled with a social event must be considered.

2.5. For smaller clients it may be useful to organize stakeholder sessions to discuss certain business developments or improvements.

3. Meeting clients

3.1. Clients must be visited regularly by the director or senior staff. The meeting must be prepared by checking the previous visit report, the operational situation and the debt situation.

3.2. Before meeting international clients, who use more services of PCU, it must be coordinated with the office doing the most business with that client.

3.3. Meetings can be further prepared by using promotional material (brochures, films on smart phone or laptop), small presentations and bringing business cards.

3.4. PCU employees must strive to collect the 'dirty laundry', before it starts to smell in case of problems or under performance. Furthermore, PCU employees must ask how PCU can improve PCU's services.

3.5. Client satisfaction should always be on the agenda during meetings and other contact with the client. Questionnaires are better not used, as PCU employees can draw their conclusions after a meeting or call.

3.6. A short visit/meeting report is made with the most important facts (rates, execution, complaints) and the follow-up requirements.

3.7. The visit/meeting report is distributed to the relevant persons in PCU and the group, preferably through PCU SharePoint.

4. Follow-up

4.1. As important as the visit is the follow-up. It may be appreciated to send a short "thank you" note shortly after the meeting and to summarize the most important items discussed and the follow-up.

4.2. Offers should be made within a couple of days (or faster when required). When these take more time, this should be communicated to the client.

5. Offers/contracts

5.1. All services to clients should be performed under a type of contract, setting out the terms and conditions of the services being performed. In those cases where there is no contract (yet) <u>and</u> it is an existing client with similar activities <u>and</u> there are no obligations for a contract from our stakeholders (e.g. accreditation, program owner requirement), a confirmation must be sent to the customer with a clear description of the service to be provided, price and which conditions apply. Which conditions apply can be resolved by means of a disclaimer in the email signature.

5.2. In offers and/or contracts, it must be made clear what PCU duties and responsibilities are. PCU employees must inform the client actively that PCU works on business terms (FENEX, TIC Council (formerly known as IFIA, …) to protect PCU against liability.

5.3. It must be made clear that PCU is not an insurance company, unless that service is required and paid for.

5.4. In all cases, a due diligence will have been performed by the PCU employee to determine whether a new customer is a good fit for us, including in terms of payment behavior and reputation. The local management shall support the PCU employee.

6. Inter company

6.1. When dealing with international clients, who use more PCU's services, the director or senior staff coordinates with the office doing the most business with that client. This coordination applies for offering rates as well.

6.2. Sometimes PCU is mentioned in Letters of Credit, thanks to another PCU office. The rate PCU offers must be coordinated with that office.

6.3. Jobs marketed by other PCU offices must be executed at decent rates, a marketing commission of 10-15% is the guideline. In general, PCU offices must avoid internal invoicing as much as possible.

6.4. The contacts with the clients should be as direct as possible, as most clients appreciate this and to avoid double handling and extra communication chains. The same applies for reporting. The focus must always be on the client.

6.5. When the client prefers one contact point, this must be arranged in the most efficient way to minimize double handling.

7. Service innovations:

7.1. There are many tools in information and communication technology to improve, enhance and speed up PCU's services.

7.2. PCU employees must have an open mind to innovation and technology, especially concerning smart phones and other appliances (apps) which offer mobile opportunities in the port or field to increase the efficiency of PCU's services.

7.3. It is always good to raise the subject of sustainability, as most of PCU clients are interested in this, and deal with sustainability at the request of their clients.

8. New services

8.1. By listening well to clients and the market, new opportunities can be identified. It is an advantage to be part of PCU with many different services and high levels of competence worldwide.

8.2. In logistics, the 4th party concept (4PL) is a focus. PCU prefers to be the logistics manager of a product chain instead of a subcontractor.

9. Complaints

9.1. When there are problems, complaints or incidents, e.g. with the execution, PCU employees must not hide these, but inform the colleagues and/or client pro-actively. By doing this quickly, problems and solutions can be discussed with the client before things get out of hand.

9.2. Complaints and claims by clients must be addressed seriously in a structured way by the director or senior staff and, when appropriate, reported to the relevant management team. This is to avoid a reoccurrence within the group. This must be done via the Incident Reporting; the form can be found in Annex 06a Incident report.

10. Payments

10.1. If not otherwise specified in the contract with the client, invoices must be send immediately after completion of the job. The director or senior staff must monitor that this is done. Depending on the agreements and services, monthly invoicing is allowed.

10.2. In certification activities invoicing and collection in advance is strongly recommended to prevent conflict of interest.

10.3. The payment of invoices must be regularly checked. The financial position of the client and the market must be monitored.

10.4. The first contacts with the client about due payments (after 60 days) can be with the financial department of the client. After 90 days the director or senior staff needs to contact the relevant person(s) at the decision level of the client.

10.5. A client who should pay but does not, is not a client. When debts become too high or too old (> 100 days) an external service to collect the money usually works effectively on a "no cure no pay" basis.

10.6. The commercial department is an important part in the collection procedure and should help actively in getting the invoices paid from PCU clients. "An invoice that is unpaid, is a sale that never happened." It has no worth, maybe even costs taxes.

11. Tenders

11.1. More companies nowadays tender their contracts, and governmental organizations are obliged to tender contracts exceeding certain amounts. Governmental tenders can be found on the relevant websites.

11.2. A well-considered decision whether to bid must be made by the relevant management team just after a tender is released. A bid/no bid decision tree, tools and checklists are available on the business development team site (PCU SharePoint).

11.3. Bidding must be managed as a project with a team, planning and deliverables. Critical activities, like gathering all relevant corporate documents and certificates must start early. Enough time must be planned for document reviews and management approval. Quality documentation and certificates are available on PCU SharePoint, corporate documents are available on request (legal@onepeterson.com).

11.4. When applying to a tender, it should be assessed whether that indirectly entails approval to contract terms beforehand (for example on applicability of terms and conditions).

11.5. This assessment must be approved by the regional management, assisted by the legal department.

11.6. Share the tender documents on the business development site (PCU SharePoint) and evaluate the bidding afterwards to learn lessons: why did PCU win or lose?

6. HEALTH, SAFETY, ENVIRONMENT AND QUALITY

A. WHY?

Effective health, safety, environment and quality systems are important to constantly improve PCU performance.

B. RESPONSIBILITIES

Director: decides on health, safety, environment and quality systems, responsibility for management, maintenance and support.

Senior staff and/or (health, safety, environment and) quality manager: management, maintenance and support of the systems.

Employees: participate in health, safety, environment and quality systems.

C. EXECUTION

1. Introduction

1.1. Various health, safety, environment and quality systems apply in PCU, depending on the activity. The relevant director decides which systems are appropriate.

1.2. The ISO 9001:2015 standard is the minimum requirement PCU Management System for all entities within PCU. Preferably this is also certified. This Management Manual can act as a template to implement these requirements. ISO 9001 can be replaced by an accreditation such as ISO 17020, 17021, 17025 or 17065.

1.3. The director appoints a senior staff member or a (health, safety, environment and) quality manager for the management, maintenance and support of the system.

1.4. All relevant employees must participate in the system.

1.5. All relevant documents, such as manuals and standards, related to health, safety, environment and quality systems are managed for updates and distribution. This as paperless as practical, also by using PCU SharePoint. Changes in documents are identified by marking them in italics.

1.6. Essential equipment for the execution of the work must be reliable and kept reliable. A tool is available to manage equipment, called Supervision and can be found in the Quality & Safety section on PCU SharePoint.

1.7. The key aspects of the health, safety, environment and quality systems are reported on in the management review.

1.8. Various certifications and accreditations (among others ISO 9001, ISO 14001, ISO 17020, ISO 17021, ISO 17025, ISO17065) apply for different PCU companies. Additional requirements apply for these certifications and accreditations and are mentioned the specific management systems.

2. Safety

2.1. For all operational work activities there must be a clear safety instruction and/or guideline. The contents depend on the work environment (terminals, plants).

2.2. Safety is always on the agenda of regular work meetings, briefings and training.

2.3. The implementation of safety is checked and monitored by supervisors and by internal audits.

2.4. All incidents and non-conformities must be registered and reported by means of an Incident Report, various tools and systems are used. Incidents are also reported on in the yearly management review:

- **Fatality**: A death directly resulting from a work injury regardless of the length of time between the injury and death.
- **Lost time incident**: A Lost Work Case (LWC/LTI) is when the employee is away from work for seven or more days after the day of a work-related injury or illness. Incidents are still considered to be an LWC/LTI case even if the first day of work missed is several days/weeks/months after the initial date of the incident or is prescribed days off by a physician.
- **Restricted work case**: A Restricted Work Case is when the employee, because of work-related injury or illness:
  - Was assigned to another job on a temporary or permanent basis.
  - Cannot perform routine functions (functions performed at least once a week)
  - Associated with his or her permanent job or cannot work the full workday.
- **Medical treatment case**: Medical Treatment Cases (MTC's) are cases that are more serious than first aid cases. Medical treatment in this case refers to management and care of persons to combat disease or medical disorders and excludes visits for observation, counselling and diagnostic procedures. Treatment will normally be administered by a trained physician or registered practitioner.
- **First aid case**: This is any one-time treatment and subsequent observation or minor injuries such as bruises, scratches, cuts, burns, splinters, etc. The first aid may or may not be administered by a trained physician or registered professional. First Aid Cases are not recordable; however, they are investigated and documented through the incident reporting system.
- **Environmental case**: An Environmental Incident is an incident that has resulted in either a release to ground, air or water that has a detrimental effect on the environment. These are recorded as environment incidents.
- **Near misses**: A Near Miss is an incident that has not resulted in injury or damage but if the circumstances were slightly different it could have led to an undesired event.

2.5. More frequent reporting and statistics is always possible.

2.6. The consequences of incidents must be reported to the RCT team and relevant management team:

- Result of investigations
- Comments by authorities
- Follow-up on, and mitigation of, incidents
- Education and promotion (presentations)

3. Complaints and improvements

3.1. Complaints are registered with the aim of learning and improvement. Complaints can be external (e.g. from clients) or internal (from employees).

3.2. "There are no complaints" is usually not good management, but a sign of lack of interest.

3.3. For complaints, the following are registered:

- Subject
- Analysis of the cause / reason
- Impact on work done
- Actions to resolve
- Lessons learned
- Effectiveness of actions to avoid reoccurrence.

3.4. Improvements may derive from complaints or other sources (internal audits, work meetings etc.…)

3.5. For improvements, the following is registered by the managing director of the entity:

- Subject
- Analysis of the cause / reason
- Action plan for implementation
- Responsibilities and deadlines
- Monitoring of implementation
- Evaluation of effectiveness.

4. Subcontractors and suppliers

4.1. When subcontractors or suppliers are used for the execution of work, the terms and conditions for their performance must be clear, usually in the form of a contract.

4.2. The performance of major subcontractors and suppliers is monitored and evaluated on a regular basis.

5. Objectives and key performance indicators (KPI's)

5.1. Objectives and key performance indicators are a good management tool for improvement and performance. They are defined by the relevant director and must be SMART (Specific, Measurable, Attainable, Realistic and Timed). In other words, they must be clear, measurable, show commitment and have a deadline.

5.2. Objectives and key performance indicators should be monitored and evaluated on a regular basis by the responsible management.

7. RISK – AND CRISIS MANAGEMENT

RISK MANAGEMENT

A. WHY?

To identify all relevant risks and to act to mitigate or minimize these to support entrepreneurship.

B. RESPONSIBILITIES

Director: risk management, certain tasks can be delegated or outsourced.

Employee: support risk management, be alert to potential risks. alert supervisor regarding potential risks.

C. EXECUTION

1. Introduction

1.1. Risk is the effect of uncertainty on objectives. Risk management is a coordinated set of actions to direct and control PCU regarding risk.

1.2. Risk is an inherent part of PCU business; a judgement of the consequences is part of entrepreneurship. Risk management is common sense.

1.3. The director is responsible and accountable for the risk management, certain tasks can be delegated or outsourced (advice, assessment).

1.4. All employees should support risk management and act responsibly with regards to it. They should flag potential risks and report risk situations to the relevant management.

1.5. Types of risks are to reputation, legal/regulatory, strategic, financial, operational (systems/process), credit, market, security, safety, environmental, people. See also Annex 07a Risk identification.

1.6. The risk management framework consists of 4 steps:

- Risk identification
- Risk assessment
- Risk treatment (mitigation or avoidance)
- Risk monitoring and review.

1.7. A tool is available to manage risks (on PCU SharePoint in the Quality & Safety section, called “Supervision”).

2. Identification

2.1. Proper risk identification is of vital importance and must be done regularly, at least once a year alongside the management review. The danger is to overlook certain risks or areas thereof.

2.2. When starting a new activity or a new operation, the risk identification must be updated by the managing director.

2.3. It may be useful to consult an external specialist, or specialist within the group. The risk identification should always be done in cooperation with PCU's own staff.

2.4. A tool for risk identification incorporated in Supervision can be used to support the identification process, however this list can never be complete and common sense remains needed.

2.5. External risks must be identified, like political, economic, social, technological, legal/regulatory and environmental risks. Operational risks deal with capacity, capability and performance. Change risks occur with new projects, procedures and programs.

3. Assessment

3.1. For identified risks, the likelihood and the impact of occurrence must be established. Especially for the first time, it may be useful to consult an external specialist, or specialist from the group.

3.2. Some risks require immediate actions.

4. Mitigation

4.1. Based on the assessment, an action plan is defined by the director with measurable objectives to reduce the risks assessed to an acceptable level.

4.2. The action plan defines responsibilities and deadlines.

4.3. The urgency of the actions depends on the level of risk.

4.4. Examples of actions are: safety measures, better equipment, improved contracts, better insurance, training, upgrading of capacities and capabilities, improved ICT system.

4.5. When it is not possible to resolve unacceptable risks immediately, it must be decided to stop that activity. The activity can be resumed when the assessed risks are managed to an acceptable level.

5. Monitoring and review

5.1. Actions to reduce important risks (like health, safety and liability) must constantly be monitored by the responsible director.

5.2. Other actions must be monitored by the director on a frequent basis. Regular internal (work) meetings can be used for this.

5.3. The risk assessment, resulting actions and the follow-up are reported on in the yearly management review.

5.4. The director monitors that the risk assessments and follow-ups are updated on a yearly basis.

CRISIS MANAGEMENT

A. WHY?

To be able to act fast and efficient to minimize the negative effects on the organization and other stakeholders in case of a sudden incident or event (a "crisis") that might negatively impact PCU business integrity in the broadest sense.

B. RESPONSIBILITIES

Crisis team: a team of people with managerial duties that is responsible and authorized for dealing with the crisis and acting as the first line of communication towards all stakeholders involved (including press communication if that should be required to contain reputation damage).

Crisis manager: chairman of the crisis team, who should be present in the region where the crisis has started to be able to respond rapidly. The crisis manager should have the skills to chair a team and should have authority. The crisis manager reports directly to the CEO or his deputy.

Crisis secretary: member of the crisis team that will make registrations of decisions that are taken by the crisis team in the broadest sense in a crisis logbook for legal, insurance and evaluation purposes.

C. EXECUTION

1. Introduction

1.1. A crisis is any situation that is threatening or could threaten to harm people or property, seriously interrupt business, damage reputation and/or negatively impact share value.

1.2. The types of crises can be operational, ICT-related, financial, HR-related, environmental, reputational, linked with natural disasters or psychopathic acts.

1.3. When such a crisis occurs, a crisis team will be established.

1.4. External experts can also be part of the crisis team.

1.5. The team will be led by a crisis manager, preferably a (Group) MT member.

1.6. ICT incidents/crises differ slightly from other types of crises. The local presence of a crisis manager is less important, because coordination is driven by the expertise of the data centers (Rotterdam in particular), very rapid response is key to control the damage and specific technical expertise is required to determine the severity of the incident. Therefore, a dedicated crisis manager based in the vicinity of the data centers is a preferred instead of a chairman of the region team where the incident started.

1.7. In case of (potential) severe safety accidents, the root cause analysis should start as soon as possible by a separate team of safety experts.

1.8. In case of data security incidents, the team is authorized to intercept and collect the suspicious company owned devices or personal devices containing company accounts and/or company data.

1.9. Incidents should be communicated immediately to the local Director/ responsible person as soon as the employee is aware of it. It is not allowed to manage it by itself, unless it is mandatory to do so. Depending on the incident, regional MT or MT should also be informed in mediately.

1.10. A 24x7 contact point for data security shall be in place (weekend service of Rotterdam and Aberdeen IT specialist).

1.11. This procedure does not cover all aspects of crisis management. It is recommended to make more detailed risk-based crisis plans, to train crisis management, to prepare press statements, to prepare crisis websites and other crisis management facilities and to appoint a qualified internal or external spokesperson.

2. Handling the crisis

2.1. The crisis team will first establish incident response policy, resources and staffing. Moreover, it will assess that no team members are personally involved in the incident to avoid conflicts of interest. If all Group MT members are personally involved, STAP needs to be informed and a STAP member shall replace the Group MT member in the crisis team.

2.2. The crisis team will then appoint experts, depending on the nature of the crisis or event;

2.3. With well-considered actions, the crisis team will first try to minimize the damage. They will decide on informing stakeholders involved about the incident, such as employees, clients, suppliers, the press and the authorities. The CEO is preferably not the spokesman (to keep the possibility for escalation in case of mistakes).

2.4. The crisis secretary will collect, manage and safeguard all relevant information and will also record all the necessary actions of the crisis team in a logbook that can be consulted for future reference or legal, insurance and evaluation purposes.

3. Aftermath of the crisis

3.1. As soon as the crisis is under control, an incident report needs to be filed that will be used to assess the crisis and the way it was handled.

3.2. Promises made during the crisis must be fulfilled and communicated.

3.3. The damage must be assessed.

3.4. The crisis must be evaluated.

3.5. New risk assessments must be carried out.

3.6. Repair of (reputation) damage must be planned.

8. INFORMATION COMMUNICATION TECHNOLOGY (ICT)

A. WHY?

A good, reliable and secure system for information and communication technology (ICT) is essential for PCU to do business, the "Group ICT" project has been initiated to reach a higher ICT maturity level, which is also required by PCU clients.

B. RESPONSIBILITIES

Group MT: Responsible for assessing recommendations from the ICT Innovation, Operations and Security Teams on initiatives with groupwide or cross company implications and providing and communicating management support once approved.

Regional Team: accountable for regional ICT and Information Security decision making, responsible for ensuring support for regional implementation of groupwide ICT and Information Security initiatives.

Director: Identifying and communicating laws and regulations applicable to their business. Arranging resourcing to provide adequate support for all ICT systems. Appoints and supports ICT Representative, user or user group. Monitors the implementation and advancement of the projects.

ICT & Innovation Team: a cross discipline business and technical team who advise on groupwide ICT strategy.

ICT Operations Team: a global team made up of senior ICT Staff from across the business responsible for global infrastructure policy, site integration and connectivity, core IT services.

ICT Security Team: define security policy, processes and handle incident response.

ICT Representative: responsible for organizing ICT within the local business and liaising with centralized teams such as ICT operations and ICT Security teams.

Employee: proper use of systems and passwords, no private or illegal use of company ICT services and equipment. Contribute with ideas and proposals for improvement and new ideas, technologies, etc.

User or user group: cooperate with ICT specialist to ensure that applications are functional, effective, up to date, optimized and user friendly. Contribute to the implementation of the different systems.

C. EXECUTION

1. Introduction

1.1. PCU organization is decentralized with a need for central information on customers, human resources, finance and health, safety, environment and quality management.

1.2. To serve international clients there is a growing need for worldwide operational systems as well.

1.3. Information communication technology (ICT) is an important tool for all PCU operations. Proper attention must be given to security, reliability, confidentiality, performance, use and efficiency.

1.4. The importance of ICT will grow to increase the level of PCU services and the efficiency and reliability of PCU operations. Innovation is necessary for our position in the various markets.

1.5. Clients require PCU to be in control of PCU ICT and to be able to prove it.

2. Organization

2.1. PCU provides support through a variety of means including local, regional and global support teams.

2.2. The primary PCU infrastructure is one interconnected network and domain and as such some configuration and management must be done at a group-wide level. These activities are undertaken by the ICT Operations and ICT Security teams.

2.3. If Regional offices are integrated with the wider PCU infrastructure then they are obliged to adhere to all policies defined by the ICT Operations and ICT Security teams to ensure the availability, integrity and security of the global ICT estate.

2.4. The director may appoints a local ICT specialist for the execution of the ICT management/operation where necessary and informs the ICT Operations Team of the name, responsibilities and contact details. The specialist can be an external specialist from outside the company.

2.5. Support must be provided, by whichever party, within the policies and guidelines defined by the global ICT Operations and ICT security teams

2.6. In co-operation with the ICT Operations Team, the ICT Representative will perform asset management by maintaining documentation and logs of all hardware, infrastructure and software used, the users and the licenses. Further, a log of all password-protected information systems and external websites used by employees on behalf of the company is maintained.

2.7. The ICT Representative is responsible for ensuring the security, reliability and performance of the ICT systems. An ICT manual must be maintained to facilitate the backup of the ICT Representative.

2.8. The director ensures that the ICT Representative and the ICT department responsible for the application are formally notified when an employee enters or leaves the company. The ICT Representative and/or ICT department create or deletes the employee's account and access to all relevant information systems. The Access Request Process (Annex 08B) must be followed. See also Annex 08b Access Request Process .

3. Information security

3.1. All information must be stored, processed and disposed of in compliance with all applicable laws, regulatory requirements and internal policy requirements.

3.2. If a user suspects their account or system has been compromised this must be reported immediately to the applicable ICT Support Team. ICT support team should escalate to the ICT Security Team in the event an incident is confirmed and additional support is needed to respond and remediate. All incidents must be recorded and reported to Legal and senior management through the ICT & Innovation Team.

3.3. In the event a Data Breach is identified it must be reported promptly following the Data Breach Notification Procedure. ICT Security and Legal teams will advise on further actions. All Data Breaches must be recorded and reported to senior management through the ICT & Innovation Team.

3.4. Access to offices is restricted to authorized personnel only, visitors must be guided to ensure that they comply to the rules of the facilities.

3.5. The ICT systems must be used in a proper and legal way, no private abuse.

3.6. Third party access to PCU systems and data is allowed only when requested by an authorized person. Access should adhere to the principle of least privilege and for the minimum required time, as is feasible. Access should be reviewed and if no longer required, revoked.

3.7. Employees are responsible for the physical security of devices in their care such as laptops, phones and other portable devices. Equipment should not be left unattended in public places or insecure locations.

3.8. A Clear desk – clear screen policy applies. See also Annex 08c Clear screen policy .

3.9. An access control policy applies. See also Annex 08d Access control policy.

3.10. For protection against malicious files , only systems and hardware (e.g. USB stick or CD) provided by the employer or proven to be free of viruses and other malicious software may be used.

3.11. Endpoint protection software must be installed and kept up to date on all company devices, including portable devices like laptops, tablets and smart phones .

3.12. All PCU domain user accounts must be password-protected following the Password Security Policy. See also Annex 08f Password Security Policy .

3.13. All devices storing or accessing company data should be protected by password, pin or biometric security credentials.

3.14. Obsolete equipment must be returned to the employer to ensure data destruction and proper disposal.

3.15. No external hardware or software may be connected to the PCU corporate network without prior consent of the responsible ICT Representative. Guest network shall be made available where internet connectivity for visitors or 3rd parties is required.

3.16. All systems and data is are backed-up in accordance with business requirements.

3.17. A copy of backups should be stored in an offsite location distinct from the primary processing location to minimize risk of loss in the event of a fire or other physical damage to the primary processing location. See also Annex 08a ICT Back up policy .

3.18. Backups must be tested at least on a regular basis. Test outcomes should be logged for auditability.

3.19. All software should be configured to ensure secure access in accordance with the Software Lifecycle Policy. See also Annex 08g Software Lifecycle Policy .

3.20. Risk management will be maintained for adequate availability, integrity, confidentiality of information and performance and capacity of information systems.

3.21. A Change control policy applies. See also Annex 08e Change control policy .

4. Development and maintenance

4.1. The ICT & Innovation Team should be consulted prior to all software development projects commencing.

4.2. The ICT Security Team must be consulted during requirements gathering and shall advise on recommended Security Requirements for the project.

4.3. An Expert Team may be appointed by Group MT for involvement in groupwide or cross-company projects.

4.4. The director appoints a user or user group to participate in the development or maintenance of the ICT applications and makes sure that time is available for proper participation and follow-up.

4.5. New applications can only be successful when clear objectives on functions, security, performance, efficiency and output are defined. This is done in cooperation with the director, ICT Representative and user or user group. The availability of applications in the group is checked.

4.6. The user or user group and ICT Representative cooperate in the process and system analysis for the application and decide to make a proposal to the director for this application, including the necessary software, infrastructure and hardware.

4.7. The director decides to implement the new application and makes sure adequate staff and resources are available. New software and software versions must be validated by the ICT Representative. The chosen validation method must be described and followed, including a risk assessment with attention for security of data and systems.

4.8. The user or user group and ICT Representative cooperate in the development, testing, implementation and maintenance to come to a functional, effective, up to date, optimized and user-friendly application.

4.9. A risk assessment of the application should be done prior to being put into production and reviewed following changes.

4.10. A privacy impact assessment must be done for new and changed software.

5. Hardware, infrastructure and software

5.1. Following the "Group ICT" standards and co-operation with the ICT Operations Team, the director decides on the need for new hardware, infrastructure, software and ICT applications.

5.2. All devices must meet minimum security requirements as defined by the ICT Security Team.

5.3. Following the "Group ICT" standards and in cooperation with the ICT Operations Team the ICT Representative is responsible for the following hardware and infrastructure aspects:

- Proper hardware and infrastructure are in place for the adequate functioning of ICT programs.
- An internet connection is available at all relevant places. This connection should present on a static IP address which can be reliably associated with the PCU network estate.
- Environmental controls are in place for the protection of equipment from loss of service, theft, damage or tampering in line with the associated level of Information Security Risk.

5.4. Hardware, infrastructure and software must be maintained, and all changes or updates must be tested, validated and documented following the Change control policy. See also Annex 08e Change control policy .

5.5. All software must be procured legally through correct channels and used in compliance with applicable licensing terms.

6. Outsourcing

When outsourcing ICT activities, the following items must be contracted by the relevant director:

6.1. A clear description of the task(s) outsourced, performance criteria and planning must be included.

6.2. Outsourcing provider should provide continuity in the event of the person(s) being unavailable.

6.3. Contractor may only hold and retain information about our systems (including credentials) as agreed with ICT Operations Team.

6.4. Proper documentation for users, software manuals and back up. Adequate development and maintenance of documentation, including sources.

6.5. Software shall only be developed for the sole use of the group, unless otherwise agreed and becomes the property (including sources) of the group.

9. SUSTAINABILITY

A. WHY?

Sustainability has become a fundamental requirement to be in business, the internal program "Dare to Care" is meant to improve PCU sustainability performance.

B. RESPONSIBILITIES

Director: sustainability policy and the management of the sustainability program "Dare to Care" to ensure continuous improvement in local offices. Engagement of the program leader.

Program leader: internal promotion, support and execution of the sustainability program.

Employees: participation in the sustainability program.

C. EXECUTION

1. Introduction

1.1. Sustainable development is meeting the needs of the present generation without compromising the ability of future generations to meet their own needs.

1.2. Corporate social responsibility (CSR) is finding a balance between profit, planet and the wellbeing of people within and outside of the organization.

1.3. Sustainability is a general term that includes sustainable development and CSR.

1.4. PCU sustainability program "Dare to Care" is for internal use. The program contains four blocks:

- Customers
- Employees
- Environment
- Community

1.5. Discussions with clients on sustainability are useful for service development, exchange of ideas, combined interests or projects. In all cases PCU employees must remain modest, as PCU achievements on sustainability are limited to date.

1.6. The following is NOT part of the program:

- Statements that PCU is "sustainable" or "carbon or climate neutral"
- Compensation by planting trees or otherwise.

2. Background

2.1. The reasons for PCU sustainability program:

- Clients, society, government and employees expect the PCU to become more sustainable.
- The growing world population puts a strain on water, food, energy and raw materials.
- Companies actively engaging in sustainability are more successful, among other things, by getting more motivated employees and less costs.
- It has become a license to operate.

3. Management

3.1. The director is responsible for the sustainability policy and the management of the internal sustainability program "Dare to Care" to ensure continuous improvement in local offices.

3.2. The director engages a program leader for the internal promotion, support and execution of the program. This task can be combined with other responsibilities.

3.3. The management system is used for the implementation and management of the sustainability program.

3.4. Employees participate actively in the sustainability program and are invited to make proposals or put forward ideas.

3.5. The program may be implemented step-by-step, including the reporting on measurable sustainability standards. Also, small improvements are valuable.

3.6. The management review is used for reporting on the progress of the implementation of the sustainability program.

4. "Dare to Care": customers

4.1. A personal relationship with clients is preferred, the client must not be anonymous.

4.2. When meeting clients the following subjects must not be forgotten:

- Customer satisfaction
- How can PCU improve its service?
- How can PCU increase added value to its services?

4.3. Sustainability and innovation can be shared with clients as well, examples are:

- Transition to electronic documentation management
- Smart solutions in logistics, improving the sustainability performance
- New inspection and certification techniques
- Smart databases available for clients
- Combined audits to reduce costs and the travel footprint.

4.4. Customer satisfaction must be measured, direct meetings with the client for feedback are encouraged.

4.5. Measurable objectives must be defined and reported in the management review.

5. "Dare to Care": employees

5.1. Assessment of employees is done to stimulate initiatives, opportunities, training and career development. The assessment is reported on the assessment form.

5.2. Safety and health are top priorities. Unsafe incidents are registered. Measurable objective will be defined to avoid unsafe incidents.

5.3. A healthy lifestyle for the employees is promoted. Examples are:

- Playing sports together
- Contribution for fitness/sports center fees
- Promote going to work by bicycle
- Healthy lunches.

5.4. Sickness-related absence is measured, measurable objectives will be defined to reduce this absence.

5.5. Personal entrepreneurship and development are the best tools for business achievements. Employees with potential must be given the means to develop.

5.6. Depending on the size of the operation, a structure for personal development is appropriate, examples are:

- Training schemes
- Job rotation, within PCU or the group
- Project development, for example innovation
- Brainstorming sessions with clients.

5.7. Measurable objectives must be defined to create or improve this structure for personal development.

6. "Dare to Care": environment

6.1. Measurable objectives must be defined yearly to reduce the electricity and energy use, fuel consumption, flights, commuting by car or public transport, the use of paper, waste disposal and water use (when possible). When available, renewable energy must be considered.

6.2. These objectives can be achieved by introducing more efficient electricity systems and energy management, more efficient (travel) planning tools, paperless office and recycling.

6.3. Measurable objectives must be defined to increase green procurement every year, for example by using FSC paper, biofuels, organic or responsible food and drinks.

7. "Dare to Care": community

7.1. A local community project is selected to support. Preferably, the project must be in relation to PCU activities and support is not only financial but involves voluntary work by PCU employees (teambuilding) as well. The progress of the project will be reported, and it will be monitored so that money and efforts are well spent.

7.2. It is also possible to develop a community project by ourselves, or support community work by PCU employees. Examples can be a support fund for children (of employees) going to school, cleaning-up the environment of PCU office (teambuilding) or voluntary work by employees.

7.3. Certain projects can be supported on a bigger scale to function as a showcase for the group. The responsibility for monitoring such a project so that PCU support is well used, remains with the local office.

10. INTERNAL AUDITS

A. WHY?

Good internal audits help to improve the business, help the organization to be self-critical and create awareness.

Internal audits verify the compliance with applicable standards and check if the management system is effectively implemented and maintained. The internal audit verifies information submitted to the Regional MT or to the MT.

B. RESPONSIBILITIES

Director: follow-up of audits, monitor and support internal audits by others.

Senior staff and/or (health, safety, environment and) quality manager: conduct internal audits and follow-up on audits.

Employees: participate in internal audits and the follow-up. They also help in the audit process by providing information and required documents.

C. EXECUTION

1. Introduction

1.1. At least once a year an internal audit is required on the implementation of the PCU management system and the connected (health, safety, environment and) quality systems. Guideline for internal audits is available in Annex 10b Guideline internal audits.

1.2. There may be additional requirements for accreditations, certifications and recognitions regarding the frequency and the scope of the internal audits.

1.3. Various checklists, formats or applications are used. Examples are available on PCU SharePoint. The internal audit format as shown in Annex 10a Internal audit format, can be used as an example.

1.4. Audits are done by senior staff and/or (health, safety, environment and) quality manager.

1.5. The auditors must be trained as ‘internal auditor’. External courses are available worldwide.

1.6. Internal auditors do not audit their own work, this should be done by an independent auditor.

2. Audit

2.1. The audit is prepared by checking previous (internal and external) audits, the management review and other relevant information.

2.2. Audits are not interrogations; they are intended to improve PCU business and its organization.

2.3. An audit plan must cover the requirements of applicable standards as well as the elements of the management system, such as:

- Execution of work (incl. performance indicators)
- Clients/business (incl. client satisfaction, efficiency and logic)
- Employees/training (incl. assessments, qualifications, effectiveness of training)
- Health, safety, environment and quality systems (incl. implementation, functioning, behavior, follow-up on audits and objectives, complaints and improvements)
- Information and Communication Technology (ICT)
- Innovation
- Sustainability
- Risk
- Ethics/compliance
- Finance

2.4. Not all audits can cover all items. The execution of work and the major management aspects must be audited at least yearly. All items should be audited at least every 3 years.

3. Follow-up

3.1. The results of the audit are discussed with the employee(s) involved.

3.2. Follow-up measures are agreed upon, including who is responsible and the deadline when these must be completed.

3.3. Audits are reported by completing the audit checklist, format or application. For each subject the positive and negative findings are noted and, when applicable, also the follow-up measure, the name of the executor and the deadline when the measure must be ready.

3.4. In case an audit results in improvements, reference is made to the relevant improvement (form / application) in the management system.

3.5. A deadline for checking the follow-up is agreed upon. The employee responsible for the follow-up measure(s) reports the progress of the measure(s) before the deadline.

3.6. Once a year, audits are evaluated in the management review, including those findings which may be relevant for other offices. In case of urgency, these findings are reported immediately.

4. Risk, Compliance & Trust (RCT) team

4.1. All employees (own and hired) are obliged to cooperate with RCT requests.

4.2. Additional audits are done by the RCT team, these are not to replace the regular internal audits. The selection of offices/operations is done by the RCT team on a risk-based system with a minimum frequency of once in every 3 years**.**

4.3. The director of the office/operation is responsible for the preparation of the audits to achieve the maximum benefit.

4.4. The director is responsible for safe and appropriate accommodation and travel needs of the RCT auditor.

4.5. The RCT auditor reports his findings to the director, to the Regional Management team and to the chairman of the RCT Team.

4.6. The director is responsible for the pro-active follow-up of the audit to keep the RCT team as efficient as possible.

4.7. The checklist used by the RCT team is available in RCT Teams channel.

4.8. The RCT obligations, rights and responsibilities are addressed in the RCT Regulations, see also Annex 13d RCT Regulations.

11. MANAGEMENT REVIEW

A. WHY?

An effective management review covers all major aspects of the management system to ensure its continuing suitability, adequacy, effectiveness and alignment with the strategic direction of PCU . It is aimed at reviewing the past year and looking ahead on the short and mid-long term.

B. RESPONSIBILITIES

Director: management review and report.

Senior staff and/or (health, safety, environment and) quality manager: preparation of the management review and report.

Management teams: collection of management reviews and feedback.

C. EXECUTION

1. Introduction

1.1. All PCU companies carry out a management review in English once a year in January.

1.2. The review contains the facts of the previous year and the plans for the year(s) ahead with objectives.

1.3. The review is reported to the responsible management teams.

2. Planning and preparation

2.1. The director plans the management review in cooperation with the senior staff and/or (health, safety, environment and) quality manager, who prepares the review.

2.2. The director makes sure that a proper and timely review can be done in January each year.

2.3. The mandatory management review template is provided to the director yearly, preferably at December 1st of the year which is being reviewed.

3. Review

3.1. The management review may be done in a meeting with the director, senior staff and/or the (health, safety, environment and) quality manager.

3.2. The review covers at least all items in the management review template. Apart from generic questions, offices can select the appropriate accreditation and certification standard applicable to their activities. This selection will release specific questions for those specific ISO standards to the review template.

3.3. The review contains outputs regarding management of improvements, performance indicators and client satisfaction. The compliance declaration must be signed by the director.

4. Report

4.1. The report of the management review is made by the director, using the template. The director may decide to delegate (part of) the reporting to the senior staff and/or the (health, safety, environment and) quality manager.

4.2. The report is signed by the director and stored in the online system with limited access.

5. Follow-up

5.1. The director decides upon the internal distribution of the management review.

5.2. The director, the senior staff and/or the (health, safety, environment and) quality manager plan the follow-up of the management review, including the responsibilities for improvements, objectives and performance indicators.

5.3. During the year, the follow-up of the review is monitored by the director.

12. FINANCE

A. WHY?

Reliable and fast financial administration is a must. Meeting deadlines, fast and accurate invoicing, collections, prompt (internal) payments and monitoring help efficiency within PCUG.

B. EXECUTION

1. Introduction

1.1. Each company is obligated to prepare consolidated financial statements per calendar year in accordance with the Dutch Generally Accepted Accounting Principles (Dutch GAAP), which is comparable to International Accounting Standards. Also, they must comply with all the local regulations regarding deadlines and accounting principles.

1.2. In order to comply with the legal requirements and issue timely and correct financial reporting, it is necessary that specific guidelines and rules are established. All PCUG companies, partly or wholly owned, must comply with these.

1.3. Reliable and timely reporting is important to meet law requirements, and also for the management and shareholder to be able to give guidance to the business and adjust the direction in which the business is heading.

2. Responsibilities (see RASCI Table):

In the financial guidelines and the finance manual, a more detailed description of the responsibilities can be found.

PETERSON CONTROLUNION

RCT RASCI Responsibility Matrix, sometimes also just RASCI Matrix.

R - Responsible - who is responsible for carrying out the entrusted task?
A - Accountable (also Approver) - who is responsible for the whole task and who is responsible for what has been done?
S - Support - who provides support during the implementation of the activity / process / service?
C - Consulted - who can provide valuable advice or consultation for the task?
I - Informed - who should be informed about the task progress or the decisions in the task?

				Internal stakeholders											External stakeholders		
			Before / at the latest	STAP	CEO Peterson Control Union	Group MT Peterson Control Union	Regional MT	Workers Council (Ondernemingsraad)	Global Finace team	Regional Finance	Local Managing Director	Local Accountant / Bookkeeper	*(Global) Support Team*	*(Global) Functional Team*	External auditors	Clients	National institutions (regulators)
Tasks																	
	Financial Team	appointing Bookkeeper					I		C / I	C / S / I	A / R	I			I		
		appointing External Auditor			I	I	I		C / I	R	A / R	I			I		C
	Infra structure	Bookkeeping software					I			R	A / R						
		Financial Manuals & Instructions							A	R	I	S / I	*S*				
	Budget	Preparing	November 1st				I		R	A	I	S	*S*				
		Draft budget	November 21st						I	C	A / R	S					
		Final Local approval	November 28th							I	A	R					
		Final Regional approval	December 10th			I	I	I	I	A	S / I	I		*I*			
		Final Group Budget	December 20th	I		I	I		A	R							
	Monitoring / Reporting	Monthly	the end of the subsequent month			I	I		I	S / I	A	R					
		Quaterly	the end of the subsequent month			I	I		I	S / I	A	R	*I*	*I*			
		Annual	january 31st	I	I	I	I	I	I	S / I	A	R					
	Invoicing	Clients	As agreed in the contract, otherwise within 7 days after execution of job								A	R				I	
		Inter company	within 30 days after execution of job						I	S / I	A	R					
		Inter company payments, preferable by netting	within 30 days after invoicing						I	S / I	A	R					
	Collecting								I	S / I	A	R					
	Dividend	Determine the content of the dividend resolution	within 2 months after final approval financial statements			R	I		I		A	R					
		100% of profit should be paid as dividend to the holding, if appropiated. To decided by the Group MT	within 6 months after year ending	I	I	R	I		I		A	R					

RCT RASCI Responsibility Matrix, sometimes also just RASCI Matrix.

R - Responsible - who is responsible for carrying out the entrusted task?
A - Accountable (also Approver) - who is responsible for the whole task and who is responsible for what has been done?
S - Support - who provides support during the implementation of the activity / process / service?
C - Consulted - who can provide valuable advice or consultation for the task?
I - Informed - who should be informed about the task progress or the decisions in the task?

ITALIC: If applicable

				Internal stakeholders											External stakeholders		
			Before / at the latest	STAP	CEO Peterson Control Union	Group MT Peterson Control Union	Regional MT	Workers Council (Ondernemingsraad)	Global Finace team	Regional Finance	Local Managing Director	Local Accountant / Bookkeeper	*(Global) Support Team*	*(Global) Functional Team*	External auditors	Clients	National institutions (regulators)
	Year Ending																
		Final cash transactions / bank payments	December 24th							I	R	A					
		Final intercompany invoices, dated December 31st	January 10th							I	R	A					
		Recording incoming invoices	January 20th							I	R	A					
		Start preparation financial data (like balance sheet, Income statement)	January 20th							I	R	A					
		Final upload Intercompany positions as per December 31st	February 1st							I	R	A					
		the reconciliation of the uploaded intercompany positions	February 15th							I	R	A					
		Final completion financial data	March 1st							I	R	A					
		Submitting annual account (audited & signed off) to regional finance team	March 15th							I	R	A					
		Annual shareholders meeting	May 15th	I	R	R	C / I	I	A	C / I					I		

13. CORPORATE AFFAIRS

A. WHY?

Corporate affairs must be managed in a proper way to meet legal requirements and avoid liability issues.

B. RESPONSIBILITIES

Director: company regulations, articles of association/bylaws, legal database, communications code.

Management teams: appointment and assessment of directors, communications code.

All employees: communications code.

C. EXECUTION

1. Introduction

1.1. A minimum set of rules for internal affairs is necessary to manage PCU . See Annex 13a Company Regulations

1.2. These rules cover PCU regulations, the articles of association/bylaws, appointment and assessment of managing directors, the legal database, contract database and internal communications.

1.3. It is the responsibility of each of the directors and the relevant management team to implement and maintain these rules together with this management system and supporting systems.

2. Company regulations

2.1. PCU regulations apply to regulate the responsibilities of the management team and the directors.

2.2. There are rules for the frequency and preparation of meetings, agendas, quorums for decisions and resolutions, voting and the minutes (this applies both to boards and to shareholders meetings).

2.3. There are rules for appointing the (vice) chairman and secretary and the functions of the members are defined.

2.4. Adequate and timely information must be given to the management teams and the shareholders to enable good decisions.

3. Articles of association/bylaws

3.1. Articles of associations/bylaws should always be reviewed (prior to incorporation/acquisition) by the legal department.

3.2. PCU regulations provide a total list of decisions for which directors needs approval from the management team. In summary, the director needs approval from the responsible management team for:

- renting, buying or selling property subject to registration
- entering into loan agreements, collateral management, claims and guarantees
- opening or closing branches, entering new services or terminating services
- opening, closing, buying or selling (participations in) companies
- buying or selling licenses, industrial or intellectual property rights
- awarding group pension entitlements not covered by law
- making investments > 25.000 EUR or GBP.
- practicing voting rights on shares in other companies regarding directors
- entering legal proceedings

4. Appointment and assessment of directors

4.1. The directors of the PCU companies are appointed in accordance with applicable law upon nomination by the relevant management teams.

4.2. The members of the management teams are appointed by the shareholders of PCU and assessed by the chairman of the Group MT, who is assessed by the shareholders of PCU.

5. Communications

5.1. A code for communications applies to keep internal communications efficient, smart, pro-active and transparent. See Annex 13b Communication for more details.

5.2. A social media policy and guidelines applies. See Annex 13c Social Media policy and guidelines for more details.

6. Legal Databases

6.1. Corporate Database

6.1.1. The Corporate Database is maintained and managed by the Dutch Legal Team on behalf of Group MT based on the information provided by the directors of each entity within PCUG. The Corporate Database contains relevant corporate information of each entity within the PCU Group.

6.1.2. Each director of a PCU entity is responsible for ensuring that information and documents contained in the Corporate Database are always complete, accurate and up to date.

6.1.3. The following documents (in PDF format,) must be submitted to legaldatabase@onepeterson.com , immediately these becoming effective:

- (Amended) Articles of Association/By-laws;
- Minutes and resolutions of shareholders meeting;
- Minutes and resolutions of board meetings;
- Change to the shareholders' register;
- All documents pursuant to which shares are issued, transferred or encumbered;
- Share certificates or cancelations thereof;
- Ioption documents;
- Shareholders agreements/voting agreements/joint venture agreements;
- Registrations at or confirmations of the Trade/Commercial register;
- Powers of Attorneys/proxies; and
- Insurance policies.

6.1.4. At the beginning of every calendar year an extract from the chamber of commerce or commercial registry shall be supplied to legaldatabase@onepeterson.com. The extract shall be in English or a certified English translation.

6.1.5. Each Managing Director of a PCU entity shall fully cooperate to provide such additional documents or information as may be requested from time to time by the Legal Team for the purpose of maintaining the Corporate Database.

6.1.6. Each Managing Director of a PCU entity should ensure that all material documents are sent to the Legal Team and/or their local legal advisor for review and counsel, prior to execution of such document.

6.1.7. The preferred language of corporate documents is English, unless mandatory law requires otherwise. If the documents are not executed in the English language, a(n) (certified) English translation of any document to be uploaded in the Corporate Database should be made available.

6.2. Contract Database

6.2.1. The Contract Database is maintained and managed by the Legal Team on behalf of the Group MT. The Contract Database contains all executed contracts (signed versions), as entered, by, and between PCU entities, in order to create a central repository where the local board, the management team and the Group MT have an overview of the contractual obligations and overall contractual exposure/liability assumed by each PCU entity.

6.2.2. It is the responsibility of each Managing Director of a PCU entity to send all executed contracts (except for the exempted contracts) to which a PCU entity is a party, in PDF-form, to legaldatabase@onepeterson.com, immediately following the execution by all contracting parties. The exempted contracts are contracts relating to certification services (being the contracts that are already or to be stored in ICU) and labor/employment agreements and immaterial contracts (being all contracts with a contract value of less than (the euro equivalent) of EUR 1,000.

6.2.3. The Managing Directors are responsible for ensuring that the Contract Database, in relation to their PCU Entity, is always complete and up to date.

6.2.4. Each Managing Director of a PCU entity shall fully comply with any request (as may be made from time to time) by the Legal Team to provide such additional documents or information for the purpose of uploading, maintaining and managing the Contract Database.

6.2.5. The preferred language of contracts is English, unless mandatory law requires otherwise. If the documents are not executed in the English language, a(n) (certified) English translation of any document to be uploaded in the Corporate Database should be made available.

6.2.6. The Contract Management is arranged for separately for ELT and for LATAM. For any queries, please contact the relevant representative of the legal team.

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