



# Employee Code of Conduct

TITAN Containers A/S



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## Introduction

TITAN Containers A/S and all companies in the TITAN corporate group (“TITAN”, “We” or the “Company”) are committed to provide a fair, safe, healthy and discrimination free working environment and to conduct our business in compliance with the law and in accordance with the highest standards of business ethics. We promote a culture of diversity and a workplace built on integrity, honesty, fairness and trust, treating each other and our business partners with dignity and respect.

We require our employees to act honestly and fairly in their dealings with fellow employees, customers, suppliers and other business partners, and we encourage all of them to take action if they have any concerns about unethical, illegal or improper behaviour in any of their dealings.

With the purpose of ensuring that all our employees act in accordance with our ethical values, we have issued this employee code of conduct, which describes the good work environment we strive for and the fundamental principles that shape the way we do business (“Employee Code of Conduct” or “Code”). This Code applies to each and all employees of all the companies within TITAN with no exception.

Regulatory demands upon TITAN vary considerably around the world, and we continuously strive to establish core principles, to ensure full compliance. This Code is not and should not be interpreted as a means to circumvent or undermine national laws or national labour inspectorates. This Code is subject to relevant local legislation and whenever local law or policy is more or less restrictive than this Code, the stricter rules must prevail and be followed.



## Equal Opportunity Employment

We maintain a respectful, inclusive, productive and diverse work environment, by providing equal opportunity to employees and by requiring that all of us treat each other with dignity and respect, even when our ideas or experiences may differ. Employment in TITAN is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of colour, race, caste, religion, national or ethnic origin, ancestry, pregnancy status, sex, age, marital status, mental or physical disability, medical condition, sexual orientation, cultural background, political opinion or any other characteristics protected by law.

## Prevention of Workplace Harassment

We do not tolerate any sort of harassment, either verbal, physical or visual. Employees shall be treated with dignity and respect and shall under no circumstances be subject to any form of physical, sexual, psychological or verbal harassment or abuse of any kind. If you witness or experience harassment of any kind, including violence, threats, intimidation or bullying, we strongly encourage you to immediately report the incident to your line manager or to any other senior manager of TITAN, and your complaint will be immediately investigated and appropriate action will be taken.

## Workplace Security and Safety

We are committed to providing a safe, secure, and hazard-free work environments worldwide, and to ensure the health and social well-being of our employees individually and collectively. TITAN's health and safety rules and procedures must be followed and performed according to the highest professional standards and ethical principles. Safety is everyone's responsibility, and we must work towards correcting what is wrong and doing our part to continuously maintain and improve our safety. We shall all speak up about unsafe conditions or activities and ensure they are reported appropriately. For more information, please check if local policies are implemented in your country.



## Freedom of Association

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TITAN respects the right of all employees to join trade unions of their own choosing, or to refrain from such activities. Employees shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

## Anti-Corruption/Gifts

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TITAN does not tolerate corruption or bribery in our business practices by any of our employees or any third parties working on our behalf. Our relationships with customers, suppliers and business partners are built on trust, value, quality and service. Our employees cannot (i) promise, offer, or give anything of value to either a government official or an employee or representative of any business partners with the intent to improperly influence their conduct, and (ii) receive anything of value that could be perceived to improperly influence our conduct. We cannot tolerate that any of our employees pay or receive any form of concealed commissions, kickbacks, rebates or anything of value to obtain any sort of business advantage or personal benefit. TITAN's employees may only accept modest gifts (less than USD200.00). Ordinary business meals and small tokens of appreciation generally are acceptable. Gifts of cash or cash equivalents, such as gift cards, are not permitted.

## Fair Competition

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We are committed to promote and support open and fair competition and we must act fairly with all our business competitors, potential competitors and business partners and we do not tolerate any kind of anti-competitive practices. Our focus is to supply great products and services and that is how we compete in the market. We must continuously refrain from all unfair behaviour towards competitors or customers and therefore you must not (i) discuss prices, bids, quotations, discounts etc with competitors, (ii) make agreements with competitors to divide markets or allocate customers; (iii) make false or deceptive statements about ours or the competitors' products and services or (iv) any other practice that might jeopardize open and fair competition.

# Competitive Intelligence

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We can only gather competitive information through ethical and legal means and we do not request or authorize any of our employees to do otherwise. If a new employee joins our company from one of our competitors, we welcome the addition, but not any confidential information about their former employer.

# Drugs and Alcohol

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TITAN considers any type of drug or alcohol to be incompatible with the health and safety of our employees, therefore they are strictly prohibited during working hours. If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may be adversely affecting the employee's job performance or the safety of the employee or others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behaviour, or speech.

# Employee Information

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Those of you with access to personal employee information must take special care to limit its access to only those TITAN personnel with a legitimate reason for viewing it. You must safeguard it appropriately both during and after your employment with the company. If you become aware of any instance where personal employee information was or may have been improperly disclosed, immediately contact your legal manager about your concern. Please refer to our GDPR policies for more information.



# Confidential Information

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While performing our day-to-day work, you may have access to confidential information about TITAN, business partners and customers. In general, confidential information is any of our non-public information, and that of our customers and business partners. We must not disclose confidential information relating to TITAN, its employees, customers and business partners. Confidential information should be shared only with colleagues who have a business need to know them, are informed of their confidential nature, and are authorized to see them. If confidential information must be shared with a current or potential business partner, a company approved Non-Disclosure Agreement must be signed by the recipient before any information is provided. If you need a Non-Disclosure Agreement, contact our legal manager.

# Company Assets

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Our assets are valuable and must be protected. Generally, company assets such as all depot tools, office supplies and documents must only be used for authorized activities and must not be taken out of TITAN's premises. We all have a duty to protect these assets as well as our containers from loss, damage, theft and misuse. We should also ensure their efficient use and avoid waste. Lost, damaged, or stolen assets should be immediately reported. Container scrap belongs to TITAN and the proceeds received from the sale of scrap also belong to TITAN. Private gain or benefit at the expense of TITAN's assets is strictly forbidden and will not be tolerated.





## Proper Use of Company Technology

You have a responsibility to use our company's network, computer, and communications systems ethically, legally and with special care. While in some locations occasional personal use of these systems is permitted, our usage must be appropriate and in line with existing local policies and must not interfere with our daily work. To the extent permitted by local law, TITAN reserves the right to monitor our access and use of all company systems.

## Social Media

When posting or commenting on the business, unless authorized to speak on behalf of TITAN, you must state that the views expressed are your own. Employees should not speak on behalf of TITAN without authorization.



## Environmental principles

We shall continuously improve our environmental standards and work towards minimizing the environmental impact of our business, by improving the efficiency of our operations and products, using energy sources as efficiently as possible and reducing greenhouse gas emissions and emissions related to noise/odour/nuisance. We shall continuously search for business partners engaged in protecting the environment in a constant search for environmental friendly solutions and therefore give preference to sustainable products, identifying, selecting and purchasing products (i.e. goods and services) with significantly less adverse environmental and social impacts than alternative competing products.

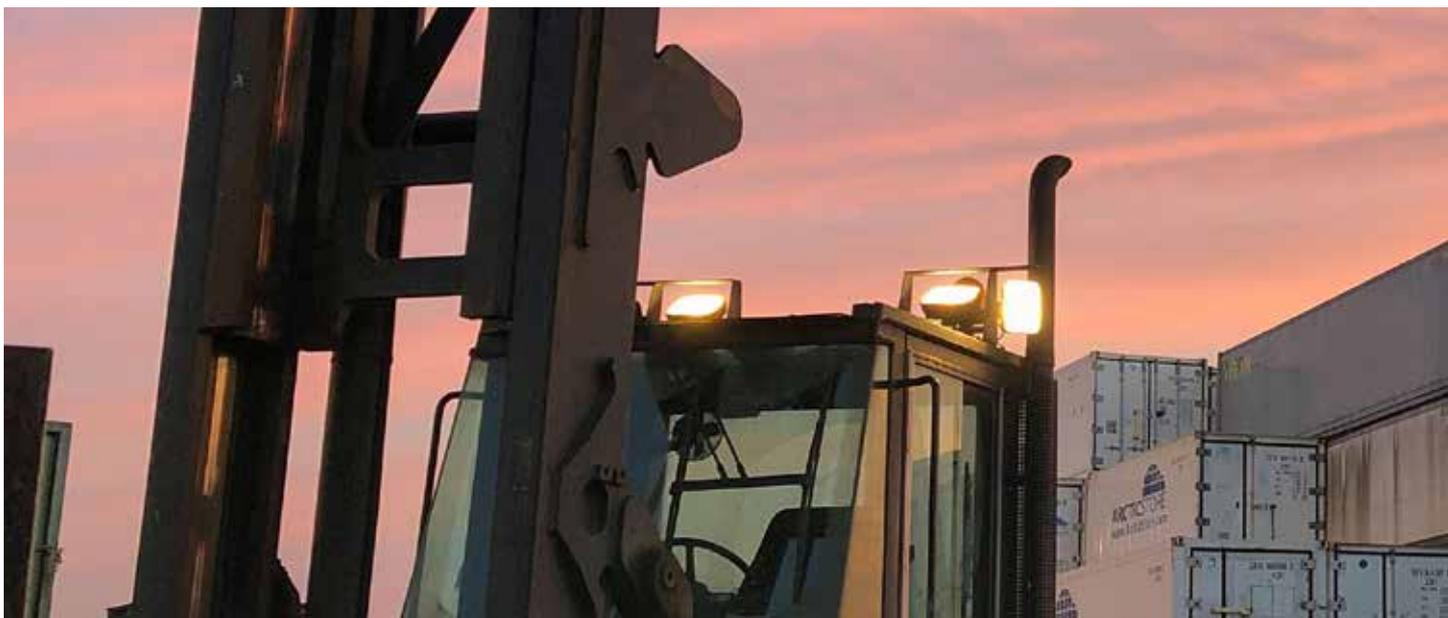
# Our Responsibility to Speak Up

We believe it is important for all our employees to have a voice and to raise it when they believe it is necessary. This includes violations of this Code, company policies or procedures, and the law. You should speak up promptly when you are aware of (or even suspect) illegal or unethical behaviour or violations of this Code, other internal or local policies or the applicable laws. We do not tolerate any form of retaliation against any employee who raises concerns, asks questions, or participate in an investigation of a possible violation of our Code, policies, or the law. Employees can raise their concerns to their manager or any other senior manager. TITAN will keep employees informed about the possibility of raising a concern anonymously through whistle blower channels to be made available within TITAN.

## Consequences of Non-compliance

Any violation of this Code will be treated seriously and may result in disciplinary action up to and including termination of employment.

Please refer to our Corporate and Social Responsibility Report published on <https://titancontainers.com/gl/about-us/csr-report>





■ **TITAN Containers**

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