

# SITRA POLICY

SAELENS INTERTRANSPORT NV (Sitra NV), part of the Sitra Group



## 1. PREAMBLE

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- 1.1 As one of the leading transporters of food within Europe, Saelens Intertransport NV, Sitra Logistic Services NV and affiliates (“Sitra”) strive to pursue a sustainable business practice. These requirements are also imposed by Sitra on their contractual counterparts, including their suppliers, subcontractors and any other third parties.
- 1.2 By signing this Policy, Sitra guarantees to comply with the principles set out below. This applies not only to Sitra themselves, but also to each employee, agent or any company with which Sitra does business.

## 2. HUMAN RIGHTS

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- 2.1 Sitra guarantees to comply with the relevant provisions of the Universal Declaration of Human Rights. Sitra also complies with the relevant provisions of the ECHR and the Charter of Fundamental Rights of the European Union. These provisions were further concretised by various international instruments, which serve as the basis for this Policy.

### 3. LABOUR PRINCIPLES

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- 3.1 The principles within this theme are based on the principles drawn up within the United Nations. In concrete terms, the ten principles of the UN Global Compact<sup>1</sup> are taken into account, which, for this theme, are based on the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work<sup>2</sup>.
- 3.2 **Freedom of Association and the Right to Collective Bargaining:** Sitra respects the right of employees to form, join or not join an union of their choice without the fear of negative consequences as a result of their membership. Members of unions will not be discriminated in any way because of their membership.
- 3.3 **The elimination of all forms of forced and compulsory labour:** Sitra guarantees that no employee is enforced to work for Sitra. Sitra guarantees that every employee is free to move and is free to leave the company in accordance with the contractual provisions.
- 3.4 **The elimination of child labour:** in accordance with the applicable legislation, Sitra guarantees that no employee will be employed whose age is below the minimum age imposed by the current legislation. Persons under 18 years of age will only be employed if permitted by the legislation in force (e.g. as a working student). Under no circumstances shall persons under the age of 18 be employed in dangerous jobs.
- 3.5 **The elimination of discrimination:** in accordance with applicable law, Sitra guarantees that any form of discrimination is prohibited. This includes any distinction or exclusion based on the 19 grounds for exclusion as defined by Unia:  
Race, skin colour, nationality, descent, national or ethnic origin, disability, religion, sexual orientation, gender, age, assets, marital status, political belief, trade union membership, state of health, a physical or genetic characteristic, birth, social origin or language.
- 3.6 **Working hours and payments:** Sitra guarantees that no person in the company exceeds the working hour restrictions imposed by the applicable regulations.  
Sitra ensures that each employee is paid the minimum wage as defined by the applicable regulations in the country of employment. The Employees are able to verify the amount received by means of a pay slip.

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<sup>1</sup> [www.unglobalcompact.org/what-is-gc/mission/principles](http://www.unglobalcompact.org/what-is-gc/mission/principles)

<sup>2</sup> [www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm](http://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm)

## 4. ETHICS

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- 4.1 **Competition law:** Pursuant to Articles 101 TFEU<sup>3</sup>, Sitra shall not conclude agreements or concert its practices with others within the market thereby preventing or distorting competition within the internal market. Should Sitra have a dominant position in the internal market, or a substantial part of it, Sitra will not use this position to prevent trade between Member States, as provided in Article 102 TFEU.<sup>4</sup>
- 4.2 **Anti-corruption and anti-bribery:** Sitra guarantees that no actions that could be qualified as (an attempt to) commit bribery take place within his company. The term 'bribery' is hereby used in its widest possible meaning. It covers both private bribery and public bribery. A bribe occurs either when the company itself bribes another person or when persons within the company are bribed. It also takes a broader view than the payment of a sum of money. Bribery can also take place by offering goods or services, by giving gifts or by paying (travel) expenses. Sitra shall make clear agreements within their company regarding the receipt of gifts by their employees. Sitra shall keep a gift register, in which the gifts are registered.
- 4.3 **Anti-money laundering legislation:** Sitra guarantees that all anti-money laundering obligations imposed by applicable law are fulfilled.
- 4.4 **Privacy law:** Sitra complies with the obligations imposed by the General Data Protection Regulation (GDPR)<sup>5</sup>. If Sitra, as controller, chooses to use a processor based outside the European Union, this processor must guarantee the same level of protection as that given by the GDPR.
- 4.5 **Prevention of conflicts of interest:** Sitra guarantees that a procedure is in place to prevent conflicts of interest. There is a conflict of interest when an employee his personal relation or activities outside work may hinder his (or any person active in the Sitra group) objectivity, judgment or capacity to act in the best interest of the Sitra Group.

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<sup>3</sup> [EUR-Lex - 12008E101 - EN \(europa.eu\)](#)

<sup>4</sup> [EUR-Lex - 12008E102 - EN \(europa.eu\)](#)

<sup>5</sup> [VERORDENING \(EU\) 2016/ 679 VAN HET EUROPEES PARLEMENT EN DE RAAD - van 27 april 2016 - betreffende de bescherming van natuurlijke personen in verband met de verwerking van persoonsgegevens en betreffende het vrije verkeer van die gegevens en tot intrekking van Richtlijn 95/ 46/ EG \(algemene verordening gegevensbescherming\) \(europa.eu\)](#)

## 5. ENVIRONMENTAL PRINCIPLES

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- 5.1 The transport sector has an impact on the environment. Sitra takes measures to reduce this impact.
- 5.2 **Energy is an important component.** Sitra ensures that only the minimum amount of energy required for its proper functioning is used. Sitra uses renewable energy to the extent possible. Sitra takes measures to increase the share of renewable energy in his business.
- 5.3 **Water consumption:** Water is a scarce resource. Sitra guarantees that the consumption of water is limited to the minimum.
- 5.4 **Fuel consumption:** Sitra takes all necessary steps to reduce fuel consumption.
- 5.5 **Animal Welfare:** Sitra transports goods of animal origin. Sitra asks his partners to guarantee that all goods delivered come from animals that were raised in dignified conditions.

## 6. QUESTIONS, COMMENTS AND FURTHER INFORMATION

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- 6.1 If anything in this policy is unclear and needs further clarification, please contact us at any time by sending an e-mail to [qualit@sitra-group.com](mailto:qualit@sitra-group.com).