

### Statement from the CEO

I am proud to present BDP's annual Communication on Progress (COP) report. BDP remains committed to good corporate citizenship in the global community. This report expresses our continuing commitment to the UN Global Compact and its principles. At BDP, we strive to ensure that these principles are ingrained in BDP's business culture, operations and mission as a company. BDP's most valuable assets are its integrity and ethical commitment, which set us apart from the competition. Protecting these assets and our reputation is the duty of everyone in BDP. To that end, we also strive to influence those with whom we do business (including our agents, consultants, suppliers and customers) to adhere to and embody our guiding principles. As a member of the UN Global Compact, we will continue to promote and conform to these values with our sphere of influence.

Sincerely,

Richard J. Bolte, Jr. Chairman & CEO





### **Background**

BDP International, Inc. ("BDP") was founded in 1966, and is now established as one of the leading privately held freight logistics/ transportation management firms in the United States. We have operations in more than 120 countries, including more than 115 offices around the world, and employ over four thousand employees worldwide. BDP People believe in delivering on the promise of service excellence, integrity, fair dealing and social commitment.

BDP provides a range of services, including ocean, air and ground transportation; freight forwarding; logistics consulting services; and state of the art web-based shipping management systems.

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Principle 2 - - - - Page 8

**Business should** support and respect the protection of internationally proclaimed human rights; **Businesses should** make sure that they are not complicit in human rights abuses.

## LABOR STANDARDS

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**Businesses should** uphold the freedom of association and the effective recognition of the right to collective bargaining; **Businesses should** uphold the freedom of association and the effective recognition of the right to collective bargaining; the effective abolition of child labor; and the elimination of discrimination in respect of employment and occupation.

# **ENVIRONMENT**

Principle 7 - - - - Page 17 Principle 8 - - - - Page 21 Principle 9 - - - - Page 26 **Businesses should** support a precautionary approach to environmental challenges;

**Businesses should** undertake initiatives to promote greater environmental responsibility;

**Businesses should** encourage the diffusion and development of environmentally friendly technologies.

# ANTI CORRUPTION

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**Businesses should** work against corruption in all its forms, including extortion and bribery.

## Principle 1

Business should support and respect the protection of internationally proclaimed human rights.

#### **COMMITMENT**

BDP Supports the internationally recognized human rights contained within the Universal Declaration of Human Rights and seeks to avoid complicity in human rights abuses.

### **PROCCESES & SYSTEMS**

**Equal Employment:** BDP International is proud to be an Equal Opportunity Employer. We believe that diversity of our employees worldwide is a great strength of BDP. BDP does not discriminate in employment opportunities or practices on the basis of race, color, religion, age, national origin, gender, sexual orientation, disability, union affiliation, veteran status or any other status protected by law. We expect that all employees will be treated equally without regard to these characteristics. Consistent with this policy, BDP International strives to ensure the following:

- BDP's Equal Employment Policy is a global policy that applies to business in all regions, in order to promote the principles of non-discrimination and equal opportunities regardless of race, religion, national origin, gender, sexual orientation, disability, veteran or any other protected status.
- BDP employees are informed of the policy via training and the BDP Intranet and have access to BDP's Equal Employment processes and mandates through the Employee Handbook and Global Code of Conduct. BDP also provides employees with an anonymous hotline and web complaint form via the company intranet, to report any violations or complaints to Human Resources and the Legal Department.
- Applicants are recruited, hired and trained for all jobs without regard to race, color, religion, national origin, gender, sexual orientation, disability, veteran status or any other status protected by federal, state or local laws.
- Compensation, benefits, discipline, and company sponsored programs and activities are administered without regard to race, color, religion, age, national origin, gender, sexual orientation, disability, veteran status or any other status protected by federal, state or local laws.
- Transfers, promotions and lay-off decisions are made without regard to race, color, religion, age, national origin, gender, sexual orientation, disability veteran status or any other status protected by federal, state or local laws.

# BDP Human Rights Policy

BDP is committed to developing an organizational culture which implements a policy of support for internationally recognized human rights and seeks to avoid complicity in human rights abuses. BDP maintains and enforces a Human Rights Policy to ensure that all BDP employees regardless of their religion, are treated fairly and equally, without prejudice, abuse or exploitation. This includes discrimination and other forms of abuse, in regions where US laws do not apply and civil rights procedures are not entirely clear or known to BDP.

We strive to maintain a universally acceptable standard for human rights, in accordance with UN principles and our global Human Rights Policy. Employees are expressly informed about the policy, which is available to and enforceable for all levels of employees, including senior management. The policy is maintained on the company intranet, and trainings designed by BDP's Legal, Human Resources and Compliance teams are created to promulgate the policy company wide.

BDP seeks to identify, assess and manage human rights impact within the sphere of influence. Amongst other things, BDP will:

> Respect the human rights of all employees established in the ILO's Declaration of Fundamental Principles and Rights at Work.

Select major suppliers, contractors and third parties based on the compliance compatibility with BDP human rights and social policies.

> Respect the cultures, customs and values of people in communities where we operate.

Contribute, within the scope of our capabilities, to the advancement and fulfillment of internationally recognized human rights in the communities operating and society at large by improving economic, environmental and social conditions as well as by responsible public engagement.

### Global Code of Conduct



BDP maintains a Global Code of Conduct (the "Code"). The Code applies to every officer, director and employee at BDP International. We also expect that those with whom we do business (including our agents. consultants, suppliers and customers) adhere to the Code. Our Code is designed to help our employees comply with the law and maintain the highest standards of ethical conduct. All BDP International officers, directors and employees must carry out their duties in accordance with the policies set forth in the Code and with applicable laws and regulations. The Code is available to view on the company website and Intranet.

### **BDP Anti Harassment Policy**

An important aspect of BDP's Equal Employment Opportunity Policy is to ensure that all individuals have the right and opportunity to work in an environment that is free from harassment in any nature. BDP maintains an Anti-Harassment Policy which applies to sexual harassment as well as harassment on the basis of race, color, religion, gender or sex, national origin, veteran status, age, disability, sexual orientation, familial status or any other characteristic protected from discrimination under federal, state or local law. Harassina behavior consists of discriminatory intimidation, ridicule, or insult that has the purpose or effect of unreasonably interfering with an individual's work performance or of creating an intimidating, hostile or offensive work environment, as viewed from the perspective of a reasonable person.

The policy also forbids all forms of physical, sexual or other kinds of harassing behavior. The policy is global, and provides for reporting procedures in order to ensure accountability. BDP also maintains an anonymous complaint form on the company intranet, and a reporting hotline for reporting purposes.

### **Safe Work Environment**

Through its safety committee, BDP aims to maintain a safe and healthy workplace by eliminating workplace injuries, identifying hazards and suggesting ways to prevent them.

The objectives of the committee are:

Promptly review all safety-related incidents, injuries, accidents, illnesses and deaths:

Conduct quarterly workplace inspections, identify hazards and recommend methods for eliminating or controlling the hazards;

Annually evaluate BDP's workplace safety and health program and recommend improvements to management.



Due to the company's dedication to safety, the corporate headquarters in Philadelphia, Pennsylvania was awarded the Governor's Award for Safety Excellence on September 18, 2015.

### Work/Life Balance:

BDP values the commitment every employee makes to the organization and as such provides many benefits to help employees achieve greater work/life balance, such as: vacation time, sick time, personal time, select holidays off of work, short-term and long-term disability as well as honoring any regional government laws such as the Family Medical Leave Act.

### Access to Healthcare:

BDP offers access to health, dental and vision insurance. BDP also offers retirement packages and tuition reimbursement for employees who wish to further their education. Our US based Human Resource Management System provides employees access to wealth of health and wellness knowledge which allows employees to proactively manage their own medical history. Onsite flu vaccines are provided in several of our US locations.

## Principle 2

Businesses should make sure that they are not complicit in human rights abuses.

#### COMMITMENT

At BDP, we pride ourselves on our people, processes and technology that reach beyond simply delivering our business services. To provide the finest service experience in the world, BDP emphasizes the values of accountability, customer care and enduring relationships in all regions where we have operations. These values are consistent with our culture of supporting human rights. We uphold the internationally recognized human rights contained within the Universal Declaration of Human Rights and seek to avoid complicity in human rights abuses, and combat them however we can. BDP also maintains separate policies to reinforce our stance against child labor, harassment and human rights violations respectively.



#### **PROCCESES & SYSTEMS**

Violation of Business Ethics, Code of Conduct, Human Rights Policy, Child Labor Policy, Equal Employment Policy or Anti-**Harassment Policy:** 

Any violation of applicable law or any deviation from the standards embodied in the Code will result in disciplinary action, up to and including termination. Disciplinary action may also apply to an employee's supervisor who directs or approves the employee's improper actions, or is aware of those actions but does not act appropriately to correct them. In addition to imposing its own discipline, BDP International may also bring suspected violations of law to the attention of the appropriate law enforcement personnel. BDP encourages employees to notify Human Resources if a situation arises that may with this policy. Additionally, BDP maintains a hotline and intranet based complaint form which allows employees to report violations to the Legal Department anonymously. All polices operated by BDP encourage employees to report any violations to the appropriate supervising authority.

### Global Talent Management Team

BDP's Training, Education and Development (TED) Team demonstrates that BDP is committed to investing in its most important asset, our people, by having global responsibility for the education and development of all employees. BDP was recently honored by the Corporate University Best-in-Class Awards, established to recognize internal training organizations and corporate universities that set standards of excellence. BDP University is used to administer global awareness programs such as:

- Hazardous Materials
- **Industry Regulations**
- Anti-Dumping procedures, Environmental obligations, Regulatory and Legal Compliance
- Government Security Programs
- **Anti-Corruption Compliance**
- Managing Office Politics
- Business and Ethics Risk Management
- Effective Emergency Management
- Ethical Leadership

LOCAL LEADERSHIP GLOBALLY: BDP has experienced local leadership in every BDP location and staff who thoroughly understand local laws, cultures, business practices and regulations.

**INDUSTRY THOUGHT LEADER:** As a sought after industry thought leader, BDP encourages clients and employees through our various trade communications, Trendwatch, TradeAdvisory, and Gateway, to maintain ethical best practices in all regions of the world. BDP also participates in and hosts events geared towards industry issues, externalities and ethics. For example, in 2015 and 2016 we co-organized the Ethisphere Oil and Gas Ethics Summit in Houston, Texas and we also hosted the Export/ Import Regulatory seminar in Houston, Texas; among other conferences we were involved in.

**HOTLINE:** In the event that employees become aware of any facts surrounding a transaction that might be suspicious and give rise to a violation of the Code of Conduct, they may anonymously advise BDP by calling +1 (866) 631-2807.

**ANONYMOUS COMPLAINT FORM:** Employees may also inform the company with regards to potential violations via an anonymous complaint form, easily available on the company's intranet site.



# Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

#### **COMMITMENT**

BDP strongly encourages all employees to own their personal career development through a variety of policies and programs within our organization. Through our performance based processes, every employee has the ability to re-negotiate their positions and wages during the review period. Performance reviews and internal job postings are used to incentivize career development and personal growth for all BDP personnel.

Further, BDP maintains assistance programs, such as relocation assistance, and polices for accommodating emergencies or other employee needs, for example in the case of disability. "Flextime" or flexible working hours are also available upon necessity and management approval, and performance reviews are conducted with employees every six months, to allow for the discussion of any employment related issues.

#### **PROCCESES & SYSTEMS**

**PAY:** BDP follows minimum pay requirements in each location we operate and offers competitive industry compensation.

**PERFORMANCE MANAGEMENT:** Each year, BDP publishes Key Performance Indicators for the entire global organization. These indicators are communicated clearly and swiftly throughout the organization, and each employee is assigned personal Key Performance Indicators and goals for the next year by their manager. Through a semi-annual review process, each employee has the opportunity to discuss their progress towards meeting these goals within the annual timeframe and communicate their expectation for increased responsibility and/or salary requirements.

**EMPLOYEE CLASSIFICATION:** BDP classifies employees under applicable employee categories for the region in which they operate (ex. exempt/non-exempt). All employees have a service date associated with their date of hire that governs their eligibility for various benefits such as vacation accrual rates, service recognition and participation in retirement plans. Further, employees have the opportunity to apply for internal job postings, transfers and promotions within BDP.



**MENTORING PROGRAM:** Being a privately held, family owned company that values personal relationships, BDP has historically used informal mentoring and networking throughout the organization. BDP's structured Mentoring Program varies vastly from informal mentoring as it is focused solely on the leadership development of a small group of high potential employees identified by management. The purpose of the Mentoring Program at BDP is to foster career development and share career experiences between management and high potential employees. The long-term goals of the Mentoring Program are to:

- Identify and reward high potential employees within the organization by providing them with personal attention and guidance from BDP management;
- Lay the foundation for a succession plan throughout the organization;
- Improve morale and job satisfaction of high potential employees;
- Establish a culture that values career development and networking while fostering trust throughout the organization; &
- 5. Aid in retention and recruitment of high potential employees.

#### **DEVELOPMENT OPPORTUNITIES**





**LEADERSHIP DEVELOPMENT PROGRAM:** The goal of BDP's Leadership Development Program (LDP) is to cultivate the next generation of leadership at BDP through a series of leadership development courses, networking opportunities and educational classes.

### PARTICIPANT EXPECTATIONS

- Assume greater responsibility and authority, making decisions having a significant impact on business.
- Demonstrate value and impact across the organization.
- Actively and visibly be a talent developer, creating a learning environment.
- Take ownership of personal involvement in program and success.
- Seek and apply feedback, gain self-awareness, leverage mistakes.
- Model high levels of consistency and professionalism.

### PROGRAM FEATURES

#### **CHALLENGING EXPERIENCES**

**70%** 

#### **DEVELOPMENTAL RELATIONSHIPS**

20%

#### **TRAINING**

10%

# Change starts with you.



# The **LDP** includes **FOUR** Major Opportunities:

#### **LEADERSHIP BOOT CAMP WEEK:**

One week consisting of intensive leadership development training delivered at the Global Corporate Headquarters, with training designed by Dale Carnegie.

# LEADERSHIP DEVELOPMENT SPECIFIC BDP UNIVERSITY COURSES:

A series of courses and presentations conducted by Senior Management designed to help enhance the skill sets of BDP's future leaders as they prepare for the next level of responsibility at BDP. These courses are available on BDP's online learning platform, BDP University.

#### **CAPSTONE PROJECT:**

Employees identify an opportunity to better BDP, and then develop a business case study to implement that project.

#### **NETWORKING:**

A strong network is essential for all leaders. All participants in this program meet with executive leadership of the company in both formal and informal settings in order to discuss their path within the company.

**BDP University**: BDP's Corporate University helps keep employees up-to-date on the latest transportation and logistics issues, regulations and best practices. A personalized curriculum with live classroom sessions, online webinars and self-paced "on demand" courses assists staff in professional and personal development. Training is available for legal, technical, industry specific and other education topics, which will be of use in assisting employees on the job.



# Principle 4

The elimination of all forms of forced and compulsory labor.

BDP adheres to all social and labor obligations to support its employees globally. These obligations include, but are not limited to, employee medical benefits, family and medical leave, term disability benefits and paid vacation; consistent with requirements of each jurisdiction. Also see Principles 2 and 3. BDP also offers employees flexible working hours upon management approval, safety policies at the work place, sick leave, personal leave and other social/life insurance benefits for eligible employees.

Further, to combat exploitation and abuse at home and abroad, BDP maintains a Global Code of Conduct. BDP also maintains an Equal Employment Policy, Human Rights Policy, a policy against Child Labor and an Anti-Harassment Policy. All staff is notified and trained with regards to these policies, and are accountable for adherence to them and the Code of Conduct.

Violations can lead to disciplinary action such as probation, suspension and other penalties, up to termination. BDP encourages all agents, customers and subcontractors to follow these policies as well.

BDP maintains an anonymous complaint form on its intranet website to ensure accountability with our ethical mandate, as well as a complaint hotline.

## Principle 5

The effective abolition of child labor.

#### COMMITMENT

BDP fully complies with the Child Labor provisions of the Fair Labor Standards Act and applicable state statutes, which govern the employment of minors.

#### **PROCCESES & SYSTEMS**

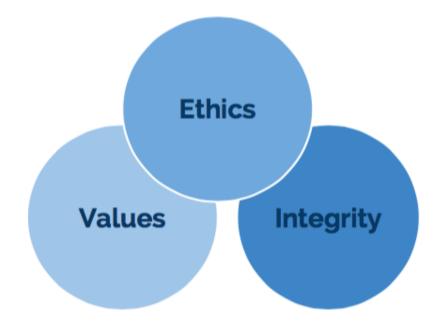
Policy: BDP requires that all employees and representatives shall recognize the U.N. Convention on the Rights of the Child, and that its business partners comply with all relevant national and international laws, regulations and provisions applicable in the country of operation. Employees and partners obliged to take the appropriate measures to ensure that no child labor occurs at their place of operation.

Each office manager shall effectively communicate to all of its employees, as well as to its own local agents, the content of BDP's Policy, and ensure that all measures required are implemented accordingly.

### **Background checks:**

BDP conducts background checks prior to hire to ensure minimum age requirements are met for all employees.

BDP maintains an active policy against child labor. All staffed are notified and trained with regards to the policy, and are accountable for adherence to it, as well as the Code of Conduct. The Child Labor Policy is easily accessible on BDP's Intranet. Violations can lead to disciplinary actions such as probation, suspension and other penalties, up to termination. BDP encourages all agents, customers and subcontractors to follow these policies as well.



Office Managers and all of BDP's business partners are instructed to take appropriate measures to ensure that no child labor occurs at their place of operation.

### **Instructions include:**

Never employ underage workers (i.e. workers below 15 years of age or any higher age prescribed by local laws and regulations).

Verify the age of all employees and anyone carrying out work for BDP against official documents.

# Principle 6

The elimination of discrimination in respect of employment and occupation.

Anti-Harassment Policy: An important aspect of BDP International's Equal Employment Opportunity and Human Rights Policy is to ensure that all individuals have the right and opportunity to work in an environment that is free from harassment of any nature. Harassment in any form including that of employees, applicants for employment, temporary employees, temporary agency workers, vendors, maintenance workers or customers is unacceptable conduct that is not tolerated by BDP.

This policy applies to harassment on the basis of race, color, religion, gender, national origin, veteran status, age, disability, sexual orientation, familial status or any other characteristic protected from discrimination under law. Employees are notified about the policy and trained about its requirements through BDP University courses and the employee handbook. The policy is also approved by the Board of Directors and is reviewed and updated annually.



#### **Anti-Harassment, Diversity and Cultural Sensitivity Training:**

BDP conducts on-going training for all employees to ensure that BDP maintains a workplace free from all forms of harassment.

#### **Harassment Complaint Procedure:**

BDP encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. All allegations of harassment are investigated promptly and in as confidential a manner as is consistent with effective investigation. BDP will take appropriate corrective action when warranted. BDP encourages all employees to assist in maintaining a harassment-free workplace. Anonymous reporting is possible through BDP's intranet site and/or hotline.

# Principle 7

Businesses should support a precautionary approach to environmental challenges.

BDP is committed to being an industry leader in corporate sustainability. BDP seeks to operate in an environmentally responsible manner through education and compliance, with sustainability at the forefront of daily business practices.

The global shipping industry is responsible for approximately three percent of the world's greenhouse gas emissions. These emissions will continue to rise unless action is taken. BDP realizes the impact that the industry has on the environment and continuously looks for new ways to reduce emissions. As a non-asset based company, BDP works with suppliers, customers and all stakeholders to ensure its environmental, health and safety standards are high priority.



To support BDP's environmental commitment, a structure has been established to ensure all initiatives are completed effectively and successfully. BDP's Sustainability Manager is responsible for maintaining, improving and communicating all of BDP's sustainability initiatives. BDP's Sustainability Program is comprised of internal, external and global community initiatives. The Sustainability Manager stays current on all industry developments to keep BDP and its stakeholders informed and prepared for any regulatory or industry changes that may occur.

BDP's current Environmental, Health and Safety Policy highlights its commitment to the environmental, health and safety of BDP's employees, customers and the global community. The Environment, Health and Safety (EHS) Policy is approved by all board members and management. In addition, BDP's Chief Executive Officer is fully supportive and influential in shaping our environmental endeavors. This policy is communicated to all employees and conveys our commitment to operate with the environment, health and safety in the forefront of our practices. Echoing this policy are several of BDP's programs: BDP Sustainability Program, the BDP Green Team, the BDP EHS Program and Responsible Care.

Sustainable action is action that meets the needs of the Present without compromising the ability of Future Generations to meet their own needs.

BDP's Sustainability Program encompasses all of our policies, programs and practices for conducting operations in an environmentally, as well as fiscally responsible manner. The BDP Sustainability Program focuses on internal and external initiatives; including an interactive training program for all employees, along with programs focused on energy conservation, paper reduction, recycling, reuse and transit. To strengthen our external presence, BDP has become a member of the Clean Cargo Working Group (CCWG). The CCWG is a global business to business initiative comprised of carriers, shippers and logistic providers. This membership allows BDP to collaborate with peers and business partners, calculate our customer's carbon footprint, along with the ability to review ocean carrier environmental data. Each of this areas further shape and define BDP's commitment to society, the economy and our responsibility to protect the environment.

BDP is also a member of the American Chemical Council (ACC) and the Chemical Institute (CD). BDP is a Partner in the ACC's Responsible Care Program now in its 25<sup>th</sup> year.

### BDP GREEN & EHS PROGRAM

The BDP Green Program began seven years ago and became a vital compartment within the Sustainability Program. BDP Green supported corporate sustainability goals and motivated employees to create initiatives focused on BDP's environmental goals. These goals include increased environmental consciousness across the company and the global community, in the areas of energy conservation, recycling, reduction of waste, reusable items and ecofriendly transit. The BDP Green Team has made several advances in establishina environmental standards in the workplace.



In 2015, the BDP Green Team decided to collaborate with the Safety Committee and the Wellness Team to form the Environmental, Health and Safety (EHS) Team. The BDP Green Team, Safety Committee and Wellness Committee have collaborated to create a more sustainable effort in the global expansion of each group. In this expansion, they will join together as the EHS (Environmental, Health and Safety) Team. The EHS Team collaboration allows BDP's EHS initiatives to reach every office across the globe

The main focus of the Environmental, Health and Safety Team will be to bring together the ideals and standards embedded in each area and communicate these to our global BDP community. To achieve its goals and truly have a global presence, the EHS Team recruited EHS and Responsible Care (RC) Ambassadors to be representatives for the EHS and RC initiatives.



#### Currently, BDP is proud to report the following achievements in 2016 and essential goals for 2017:

- Increased communication and awareness in all offices regarding recycling, paper reduction and energy conservation;
- Employee engagement via monthly internal newsletters, social networking sites, and in person discussion to enhance BDP's goal of corporate-wide awareness of sustainability.
- Environmental events in 2016 included:
- Earth Day celebration with awareness events for all employees focusing on less waste and reusable items:
- EHS Week celebration including a BDP University Course, sponsored snack and an EHS game;
- Triathlon contest engaging employees to show photos reflecting completion of three activities; one in each category: environment, health, safety.

- BDP has fully integrated the BDP Green Team, 3. Wellness Committee and Safety Committee into the EHS Team. In 2017, BDP will have the ability to communicate all EHS initiatives globally.
- At the end of 2016, there were 70 EHS/RC Ambassadors across the globe and this number will continue to grow in 2017. The EHS/RC Ambassador responsibilities include:
- Representing your office as a member on the EHS and RC Teams.
- Having responsibility for organizing and coordinating all EHS and RC events and initiatives.
- Being committed to all EHS guidelines and Responsible Care guidelines
- The BDP Sustainability training has continued to expand globally after its first year. By the end of 2016, **thirty-five** percent of employees had taken the Sustainability training; forty-two percent of employees completed a global EHS course. Both the sustainability and EHS trainings highlight areas in the workplace and at home where employees can focus on their environmental, health and safety actions.



### Ship Clean, Breathe Easy

- In 2015, **fifteen percent** of office and paper supply purchases in BDP's US offices were environmentally friendly products. In 2016, our green office supply purchases in the US totaled **sixty-three** percent of all office supply purchases. These products are either made from recyclable materials or can be recycled.
- In 2016, BDP responsibly disposed of electronic waste through a third party contractor who ensured the proper recycling of the e-waste.
- BDP continues to distribute reusable mugs to all employees in the US.

In 2016, BDP continued the annual "Green Leaf" BDP Sustainability Award with its second award winner for the innovative utilization of the document management system.

This award is an opportunity for BDP employees, teams and regions around the globe to implement sustainability initiatives and be recognized for their achievements.

- BDP awarded Inbound Logistics Green Supply 10. Chain Partner 2016.
  - Profiles companies that are demonstrating their commitment to sustainable supply chain, logistics and transportation practices.
- ISO 14001 (Environmental Management System) 11. Certification for the below countries/regions:

Asia Spain Germany



SQAS Certification in our Belgium and France offices.

# Principle 8

Businesses should undertake initiatives to promote greater environmental responsibility

# Memberships & **Supporting Partners:**

**CLEAN CARGO WORKING GROUP:** Supporting BDP's sustainability initiatives,]. BDP became a member of the Clean Cargo Working Group (CCWG) in 2013. In 2015, BDP was elected as a steering committee member for CCWG.

In 2016, BDP hosted the fall meeting for the CCWG in Philadelphia.

The CCWG is a global business initiative comprised of carriers, shippers and logistics providers.

#### This membership provides BDP with several benefits:

The ability to calculate our customer's carbon footprint using data and tools provided by the CCWG;

The ability to review and compare ocean carriers' environmental performances across a broad range of data;

Collaboration with peers and business partners to improve BDP's environmental performance; and

Help influence the development of tools, standards and methodologies for improving environmental performance across the intermodal value chain.



### **BDP Responsible Care** ®



#### A COMMITMENT TO HEALTH. **SAFETY AND SECURITY**

As a Global Leader in Chemical Logistics, getting it right **Every Time** is a commitment that BDP makes to its customers.

#### **BDP** Responsible Care ®

BDP is a proud Partner of the American Chemistry Council's (ACC) Responsible Care initiative since 2003. Responsible Care is the chemical industry's unique global -and voluntary-initiative that drives continuous health, safety, and environmental quality and community awareness of chemicals throughout their life cycle.

BDP's commitment to Responsible Care is an important action every day in both practice and mindset. As such, successful implementation of Responsible Care is a key driver in our vision of Delivering the Best Global Logistics Solutions.

#### BDP's Commitment to Responsible Care ®

Responsible Care aligns with our company's Safety Culture. Since 2003, BDP continues to strengthen our chemical expertise in the Logistics Management Sector as a Partner Practitioner in the American Chemistry Council (ACC).

We pledge to operate business in accordance with the ethics, values and principles set forth in the Responsible Care program elements:

- Endorse the Guiding Principles of Responsible Care;
- Measure and publicly report performance on an annual basis;
- Implement the ACC Security Code;
- Implement the Responsible Care Process Safety Code of Management Practices:
- Obtain independent certification that a management system is in place and functions efficiently and in line with professional specifications.

#### Our Responsible Care Story

Initiatives taken for continuous improvement

Our organization experienced another year of growth and enhanced education in Responsible Care. The core focus areas are employee engagement and education. Employees at all levels and business functions around the globe made a commitment in how to be successful in Responsible Care:

#### 1. Global Charter Campaign: Declaring Support as a Multinational Company

BDP launched a voluntarily Global Charter campaign where employees were engaged as stakeholders. Using a Global Charter template developed by the International Council of Chemical Associations (ICCA) and select ACC Member Companies that spotlight the 6 key components of Responsible Care, BDP customized the Global Charter and Executive Leadership signed the charter.

Global Charter posters were distributed to each and every office around the globe. Town Hall meetings were organized to explain the purpose and the value generated as a supply chain partner. Team members signified their roles as an integral component in this worldwide initiative with a celebration signing of the charter, no matter the department or position within BDP.

- 1. A Corporate Leadership Culture
- 2. Safeguarding People and the **Environment**
- 3. Strengthening Chemicals Management System
- 4. Influencing Business Partners
- 5. Engaging Stakeholders
- 6. Contributing to Sustainability

#### 2. Achieved Responsible Care Management System® (RCMS®) Attestation

BDP North America-US is in compliance with the requirements of the American Chemistry Council, Responsible Care Management System, Technical Specification document RC101.04.2013.

RCMS includes 7 management practices that focus on Process Safety Code. Re-certification is required every three years. Each audit is an opportunity to continuously improve our processes and system controls to mitigate risk in the chemical supply chain.

- 1. Leadership and Culture
- 2. Accountability
- 3. Understanding and Prioritization of Process Safety Risks
- 4. Comprehensive Process Safety Management Systems
- 5. Information Sharing
- 6. Monitoring and Improving Performance

#### 3. Named 2016 Responsible Care® Partner of the Year by the American Chemistry Council

The Responsible Care Partner Award recognizes the superb performance and safety record of companies involved in the distribution, transportation, storage, use, treatment-disposal, and/or sales and marketing of chemicals.

BDP's 2016 entry to the award program chronicled the Company's Global Responsible Care Charter Campaign, which focused on expanding a safety culture that engages all BDP employees across 32 countries to enhance and celebrate learning and activities under the program. Responsible Care Ambassadors were established in every country and office to collaborate with BDP's Regulatory Compliance Center of Excellence (CoE) with information-sharing and educational opportunities to enhance learning.

#### Standard Bearer for Responsible Care <sup>®</sup> Globally

Responsible Care is the chemical industry's unique global initiative that drives continuous health, safety, and environmental performance with open and transparent communication with the industry's stakeholders. BDP takes great pride in our leadership role within the chemical supply chain. BDP's commitment to the Responsible Care Program is an important priority within BDP with the focus of action and mindset as a daily practice. Further, successful implementation of Responsible Care is a key driver of our vision of Delivering the Best Global Logistics Solutions.

#### What We Want to Achieve

BDP will continue to expand the principles set forth in Responsible Care to all of its operations throughout the Globe. Focus areas include Responsible Care education and initiatives in these aspects:

- Responsible Care Global Charter Awareness
  - o Formal bi annual process with employee sianatures
- Responsible Care Guiding Principles
- o EHS & Responsible Care Ambassador Network
- Educational Trainings on BDPU
- Awareness and outreach to regional Responsible Care organizations to connect with BDP customers and prospects
- o Connect Responsible Care as a core component of a Culture of BDP Safety
- o Drive continuous improvement over our day-to-day operational and facility processes
- o Make Responsible Care and the business value generated an ongoing dialogue with **BDP** customers

#### Responsible Care Reaches One BDP

- Employee focus on Product Safety and Process Safety as a daily practice and daily habit
- Generate new ideas to do things better
- Drive traffic to the BDP Responsible Care site to enhance education, improve content and format to meet regional needs.

**Process Safety...** Ensures companies have policies, documented processes, and recommended practices for the ethical and safe manufacturing, handling, storage, distribution, risk management and government reporting for hazardous and non-hazardous chemicals.



#### 4. Developed Responsible Care Ambassador Network

#### 5. Hazardous Cargo Visibility via BDP Global Visibility Tool (BDP Smart Suite)

Chemical logistics involves added risk; tracking hazardous cargo is crucial to managing chemical supply chains. In response to this challenge, BDP developed Smart Chemical, a global visibility tool that provides additional focus on sensitive shipments with the placement of regulated hazardous placards to allow for instant visibility. All relevant information is user friendly, supporting a prompt response to hazardous incidents.

#### 6. Educational Opportunities

Developed and released a global course on BDP University: Process Safety 101: An Introduction to **Process Safety at BDP** 

- 1. Audience: Global
- 2. Encourage all colleagues to become aware of the basic principles of Process Safety and its importance in the global supply chain. All employees are responsible for safety awareness and management when it comes to chemicals.
- 3. Required for all employees who are involved in chemical logistics – operations, facilities, risk management, regulatory compliance

#### 7. Supply Chain Value to our Customers & Product **Stewardship**

- o BDP People and BDP Processes are an extension to our customers' chemical shipments for highest quality of product safety, compliant government reporting, documentation and carrier selection in the global supply chain. Product Stewardship is taking the very best care of our customers' chemical shipments throughout the supply chain.
- Responsible Care is the right thing to do
- We engage our customers and supply chain vendors to continuously improve processes, quality control and risk management
- o We continuously strive to strengthen Responsible Care activities as an integral part of a culture of BDP Safety

# Principle 9

Businesses should encourage the diffusion and development of environmentally friendly technologies.

BDP's IT Center of Excellence has a commitment. supported by a corporate policy, to ensure BDP's technology purchases and endeavors to minimize environmental impact. BDP's main environmentally friendly technology initiatives include:

**Electronic Document Management:** BDP continues its efforts to become entirely paperless via its Document Management System (DMS). DMS has been fully executed in all US offices and in offices globally. DMS will continue to be implemented in all other offices around the world.

In the past two years, BDP Rotterdam, BDP Colombia and BDP Philadelphia have utilized DMS in innovative ways to make their offices and processes more paperless. In 2017, we will be releasing an education course to guide other offices to implement DMS more effectively.

#### **Paperless Marketing Communications:**

All marketing communications are now distributed electronically. Customers can register to receive weekly newsletters and business updates via email, rather than in paper form. BDP International reduced cost and paper usage by converting the BDP calendar to an electronic version for 2016 and 2017. Marketing has made several advances to decrease BDP's carbon footprint in 2016 and will continue to expand upon these initiatives in 2017.

**Green Conferences:** BDP has implemented a web based application for external meetings and events, eliminating the need for printed signage and meeting information, questionnaires, and end of conference surveys. This significantly reduces BDP's paper waste.

BDP has hosted 8 conferences in 2016, with approximately one hundred attendees at each conference. All attendees could access all presentation and conference information on the application. BDP has procured environmentally conscious giveaways for all conference attendees, distributing recycled pens and notebooks. BDP also does not have bottled water at events and seminars, but rather pitchers of water with glasses for attendees.

Video Conferencing/Webinars/Conference Calls: BDP has continued to increase the utilization of webinars and conference calls to cut down on travel costs. BDP has installed video conferencing capabilities into the corporate office to enable employees to have global meetings to avoid the environmental and economic effects of travel. BDP has also transitioned to Google email, allowing easier access to web conferencing via Google Hangout.



# Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

#### **COMMITMENT**

BDP is committed to full compliance with both the letter and spirit if the laws and regulations in all countries in which it operates. It is of the utmost importance to BDP to conduct its business with the integrity in accordance with BDP's Global Code of Conduct and all applicable laws and regulations.

### **PROCCESES & SYSTEMS**

**Policy:** BDP operates under a Global Code of Conduct ("the Code"). The Code applies to every officer, director and employee of BDP. BDP also expects that those with whom we do business (including our agents, consultants, suppliers and customers) will also adhere to the Code.

The Code prohibits bribery in any form, including: extortion, facilitating payments, kickbacks, political contributions, and the offer or receipt of gifts, hospitality or entertainment.

The Code also ensures that BDP maintains complete and accurate financial records and makes annual anti-bribery training available for all principals and key employees involved in sales, marketing and procurement.

BDP also maintains a stringent Anti-Corruption Policy, which prohibits any form of corrupt practices, whether they are bribes or other forms of illicit payments. Anti-corruption training is mandatory and must be taken annually by each employee. An anonymous complaint hotline and web form has been created to prevent any such activity, and hold perpetrators accountable. Those caught committing corrupt acts are subject to termination.

Employees that witness any suspicious behavior are encouraged to report such behavior to the Legal Department or anonymously through the intranet or hotline.

#### **Appointment of Anti-Corruption Officer:**

BDP appointed an Anti-Corruption Compliance Officer who is responsible for the management and implementation of the Anti-Corruption Compliance Program. This includes the establishment, development and maintenance of the compliance program and the communication of these standards to all current and prospective business partners and employees.

The Anti-Corruption Compliance Officer is also responsible for periodic reporting on the effectiveness of the program through the implementation of a monitoring and auditina system to detect criminal conduct.

### **TRAINING**



BDP's Legal Team conducts ongoing global Anti-Corruption and FCPA (Foreign Corrupt Practices Act) Training through live presentations, BDP University webinars and in person via live webinars. The training consists of a detailed PowerPoint presentation on anti-bribery provisions of local legislation, the FCPA and BDP's Compliance Program. Employees are then tested on the content in the training and must score at least an 80% to pass the training.

**Certifications** are then sent to each employee after training completion to be signed and acknowledged. The certification states that the employee has completed the training and will adhere to BDP's Compliance Program. All certifications are stored electronically in BDP's legal files.

We aim to ensure that all principals and key employees involved in sales, marketing and procurement are certified in Anti-Corruption and FCPA compliance globally. In addition, all employees must participate in training annually and all new employees must complete training as part of their onboarding orientation.

BDP implemented new training in line with the World Bank guidelines on the prevention of fraud and corruption. This extensive training covers the guidelines issued by the World Bank in 2015 and has been made available to all BDP employees through BDP University, while mandatory for management executives.

We are currently working on an Anti-Corruption presentation that will target management employees within the organization. This training will be mandatory for all management annually and will go live in 2017.

BDP also conducts leadership and board trainings with reference to corruption and ethical risks along with the need for Anti-Corruption and FCPA compliance. This allows executives and board level staff to understand the intricacies of the law and practice involved in anti-corruption efforts.

#### **DUE DILIGENCE**

Included in BDP's Global Code of Conduct is a section on due diligence in selecting international consultants, intermediaries and joint venture partners. This section provides executives and employees with information on identifying proper business partners, required disclosures and the final approval process.

BDP also maintains a vetting process for selecting subcontractors and agents. All partners must certify that they are compliant in FCPA and anticorruption.

BDP is in the process of adopting regional and global vendor vetting policies to ensure that all business partners are compliant and ethically sound. Such policies involve verifying the reliability of the vendor, collecting bank details, employee details, evaluating conflicts of interests, evaluating whether employees of the vendor are government employees simultaneously and collecting their financial information with respect to vendors.

BDP has been certified in anti-corruption by TRACE International since 2015. TRACE is a non-profit organization that provides all members with anti-bribery compliance support.

TRACE members include thousands of enterprises throughout the world that work together to increase transparency in international business transactions.



### **CONTRACT PROVISIONS:**

The Code also has a section detailing contract provisions and certification requirements for BDP's consultants, intermediaries and joint venture partners. The provisions require that all parties involved are fully compliant with anti-bribery legislation, the Foreign Corrupt Practices Act ("FCPA") and the Organization for Economic Cooperation and Development ("OECD") Convention, along with all other applicable laws and compliance procedures. All contracts also set out accounting and financial provisions, reporting requirements, disclosure information and termination provisions for non-compliance.

The certification terms require each consultant, intermediary and joint venture partner to periodically certify that he or she:

Understands anti-bribery legislation and the FCPA (and OECD Convention);



Has not violated or caused the company to violate legislation (and/or OECD Convention) since the date of the prior periodic certification;



Does not know or have reason to believe that any other person retained by the company has violated anti-bribery legislation (and/or OECD Convention), or caused the company to violate them since the date of the prior certification; and



Will immediately advise a named official of the company if the certifying person should learn of or have a reason to believe there has been any violation of the FCPA (and/or OECD Convention) in connection with the company's business. BDP has been named Ethisphere Institute's World's Most Ethical Company for the years 2016 and 2017.

"This award recognizes those companies who alian principle with action, work to make trust part of their corporate DNA and by doing so, shape future industry standards by introducing tomorrow's best practices today.

The Ethisphere Institute is the global leader in advancing the standards of ethical business practices that fuel corporate character, marketplace trust and business success."

- Ethisphere Institute





BDP is honored to be recognized for such a prestigious award and will continue to drive our ethics program as a critical initiative in order to maintain such a recognition.