

# COMMUNICATION ON PROGRESS

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A report on BDP International's commitment to the Ten Principles of the United Nations Global Compact.



# STATEMENT FROM THE CEO

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**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





# ABOUT BDP INTERNATIONAL

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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 134 countries, including more than 148 offices around the world, and employ over 5000 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.

## HUMAN RIGHTS

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

**Principle 1: Page 5**  
**Principle 2: Page 10**

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## LABOR STANDARDS

**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.

**Principle 3: Page 13**  
**Principle 4: Page 18**  
**Principle 5: Page 20**  
**Principle 6: Page 23**

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## ENVIRONMENT

**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.

**Principle 7: Page 25**  
**Principle 8: Page 31**  
**Principle 9: Page 40**

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## ANTI-CORRUPTION

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

**Principle 10: Page 43**

## HUMAN RIGHTS

# PRINCIPLE 1

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



## COMMITMENT

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

## PROCESS & SYSTEM

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**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:

1. 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.
2. BDP employees are informed of the policy through Code of Conduct training and the BDP Intranet where employees have access to corporate policies, BDP's Equal Employment processes and mandates through the Employee Handbook and the Global Code of Conduct. BDP also provides employees with an anonymous hotline and web complaint form linked to the company intranet where they can report violations or complaints to Human Resources and the Legal Department.
3. 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.
4. 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.
5. 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, our Human Rights Policy and the Global Code of Conduct. Employees are 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 also expects its third parties to adhere to human rights legislation and includes this requirement in our Third Party Code of Conduct that is signed by third parties.

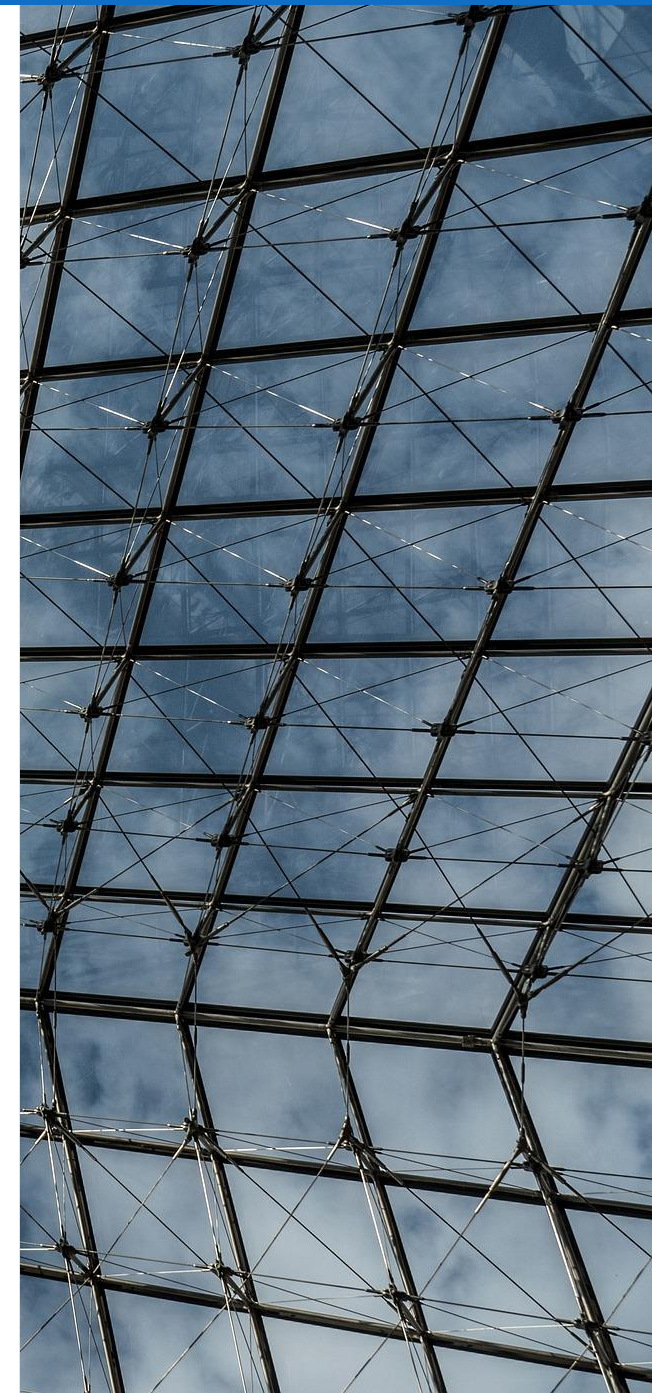
BDP seeks to identify, assess and manage human rights impact within the sphere of influence. Amongst other things, BDP will:

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

Select 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

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BDP maintains a Global Code of Conduct (the “Code”). The Code applies to every officer, director, manager and employee at BDP International. Code of Conduct training has been created that outlines each policy within the Code and the responsibilities of employees to follow all aspects of the Code. Training is available on BDP University where completion is tracked and required annually on a global scale.

We also expect that those with whom we do business (including our agents, consultants, suppliers and customers) adhere to the Code. Third Parties are also asked to sign a Third Party Code of Conduct in order to conduct business with BDP. Our Code is designed to help our employees comply with the law and maintain the highest standards of ethical conduct. All BDP 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.

The Code also includes a quicklink for accessible access to our reporting platform to report any complaints or possible violations anonymously.

# BDP ANTI-HARASSMENT POLICY

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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 of 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.

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 platform that can be accessed on the company intranet or through the quick link in the Global Code of Conduct and a reporting hotline for reporting purposes where complaints can be made anonymously in multiple languages.

BDP also conducts live training on the Anti-Harassment Policy through live in person training, webinars and the training is available on BDP University for employees to take at their leisure.



# SAFE WORK ENVIRONMENT

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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 safety meetings are held on a monthly basis. Its primary objectives are as follows:

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

**Discuss proactive measures that can be taken to avoid safety related incidents;**

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

**Evaluate BDP's workplace safety and health program on an ongoing basis and recommend improvements to management.**

# WORK LIFE BALANCE

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BDP values the commitment every employee makes to the organization and as such provides many benefits to help employees achieve greater work/life balance. Some of these benefits include: 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.

BDP also allows employees to work remotely as needed with approval from management.

When BDP has new job positions available, BDP will post those new listings on an internal site where employees have the opportunity to submit applications for new career positions and/or new locations.

# ACCESS TO HEALTHCARE

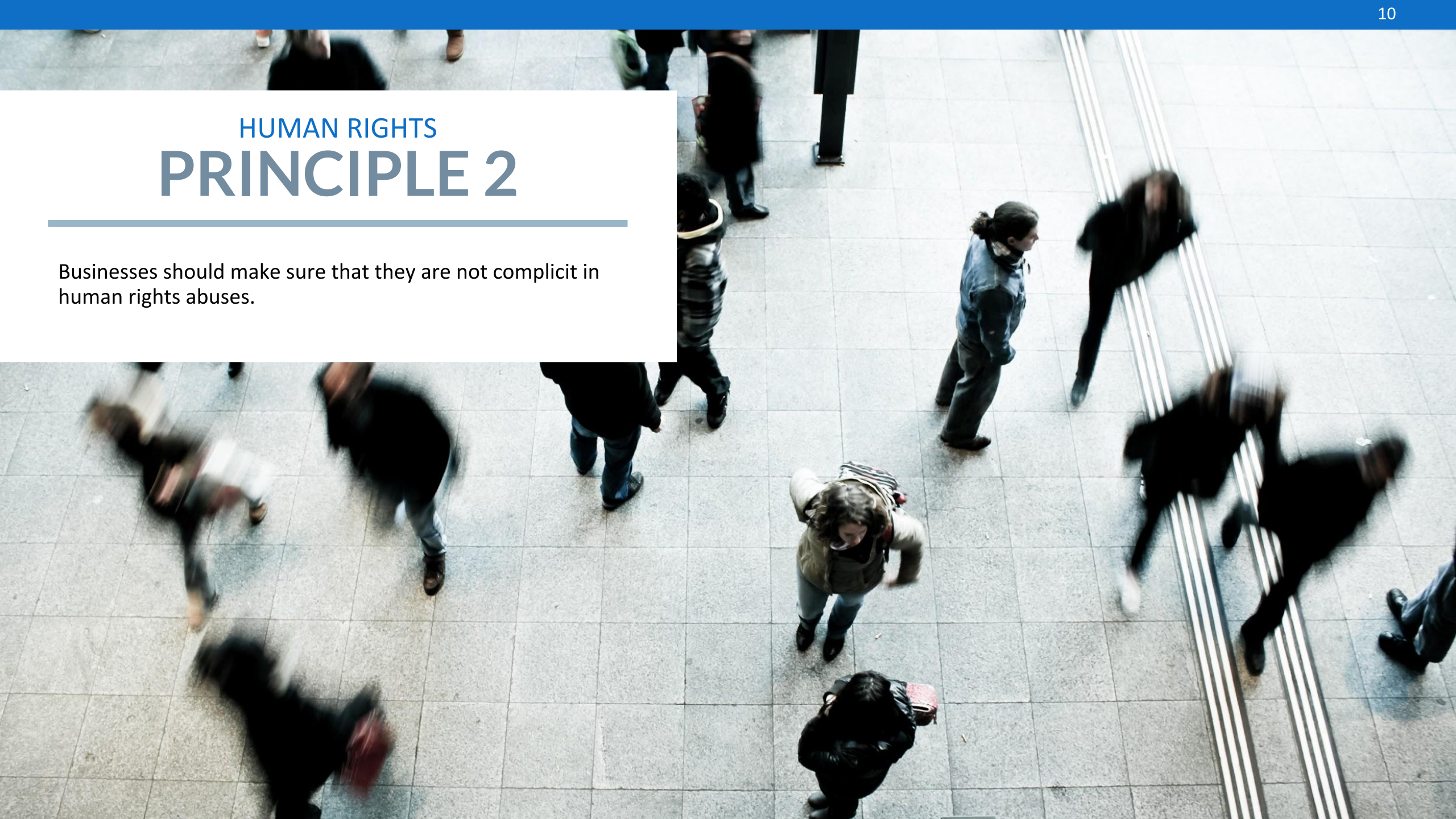
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BDP offers access to health, dental and vision insurance. BDP also offers retirement packages and tuition reimbursement for employees who wish to further their education. Our United States based Human Resource Management System provides employees access to a 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.

## HUMAN RIGHTS PRINCIPLE 2

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



## COMMITMENT

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**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.**

## PROCESS & SYSTEM

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### **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 violate this policy. Additionally, BDP maintains a hotline as well as a reporting website platform that allows employees to report violations to the Legal Department anonymously or without remaining anonymous if they wish. All policies operated by BDP encourage employees to report any violations to the appropriate supervising authority.

BDP has recently teamed up with Neighborhood Watch. Neighborhood Watch is linked to BDP's Intranet that directs employees to a website where they can report any breaches anonymously. Through the website, BDP can receive updates on reports filed as well as update the employee who filed on the steps the company is taking to investigate the reported breach.

# 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 providing global resources for the education and development of all employees. TED supports employee engagement initiatives including Customer Service Week (CSW), a Global Innovative Competition (BDP Fusion) and "BDP Aspire" Leadership Development Programs. TED manages instructor-led and virtual training, and provides eLearning through BDP University, our award winning online learning environment. BDP University is used to administer global awareness programs such as:

- Dangerous goods and hazardous materials compliance
- Logistics industry knowledge
- Anti-dumping procedures
- Environmental obligations
- Regulatory and legal compliance
- Government security programs (TSA)
- Anti-corruption compliance
- Business and ethics risk management
- Effective emergency management
- Management training
- Sanctioned Parties Training
- Global Code of Conduct Training

**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 an industry leader, BDP encourages clients and employees to maintain ethical best practices in all regions of the world through our various trade communications, Trendwatch, Tradewatch and Newswatch. BDP also participates in and hosts events geared towards industry issues, externalities and ethics. Examples include 'Ethics Fireside Chat with Richard Bistrong,' the Ethisphere Oil and Gas Ethics Summit in Houston, Texas and the annual Export/Import Regulatory seminar in Houston, Texas and Philadelphia, PA. In addition, our BDP Blog and social media presence fosters a deep connection with current and prospective clients.

**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 (267) 362-8081.

**Anonymous Complaint Form:** Employees may also inform the company with regards to potential violations via an anonymous complaint website, Neighborhood Watch, easily available on the company's intranet site.



## LABOR STANDARDS

# PRINCIPLE 3

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



## COMMITMENT

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**BDP strongly encourages all employees to own their personal career development through a variety of policies and programs. 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, such as 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.**

## PROCESS & SYSTEM

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**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.

**Employee Engagement Survey:** BDP conducts an Employment Engagement Survey that is sent for participation on a global scale. Employees are encouraged to take the survey to provide feedback and input on BDP leadership and development programs, company policies and programs, and opportunities for improvement around two way communication and performance recognition. BDP has had a 99% participation for all employees around the world. We take the results and create strategies and KPIs around how to improve or excel on strengths as an organization based on the feedback.

# MENTORING PROGRAM

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Being a privately held company that values personal relationships, BDP has historically used informal coaching and networking throughout the organization. However, in the past few years, BDP has developed a robust mentor program. 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:

1. Identify and reward high potential employees within the organization by providing them with personal attention and guidance from BDP management;
2. Lay the foundation for a succession plan throughout the organization;
3. Improve morale and job satisfaction of high potential employees;
4. 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

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**Behavior  
Competencies**

**Individual  
Development Tools**

**Succession Planning**

**Performance  
Development**

**Training**



# 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%**



# ASPIRING BDP

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The Aspiring BDP Program includes four major opportunities:

**Leadership Boot Camp Week:** One week consisting of intensive leadership development training delivered at the Global Locations. Activities consist of format training (Dale Carnegie and individual facilitation), peer relationship building and networking with senior leadership to increase participant visibility.

**Leadership Topics and Delivery:** Content for leadership development programs include cultural elements similar at all 3 levels, and also specific topics aligned for Global Leaders, Managers and Individual Contributors. Standard elements include DISC training, Mentoring, Business Impact, BDP Behavior Competencies and activities that engage the BDP 2020 Strategy. Experiences and Mentoring are customized with the individual and program sponsors. Topics and experiences that differ include: Global leader level: Hogan Assessment and coaching, executive image, negotiation, creating a strategic vision and departmental collaboration. Manager level: coaching, delegation, team collaboration and customer focused innovation. Employee level: time and productivity, presentation skills, managing change and employee engagement. These topics, delivered via presentation or eLearning, are designed to help enhance the skill sets of BDP's future leaders as they prepare for the next level or responsibilities at BDP.

**Leadership "Personal Brand" Statement:** BDP Aspire participants use the resources from training, relationships and experiences to develop an impactful "Personal Brand" that defines their leadership style, strengths and business impact. These include their portfolio of work during the program and reflective mentoring/coaching.

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



# BDP UNIVERSITY

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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 assist staff in professional and personal development. Training is available for legal, compliance, technical, industry specific and other education topics, which will be of use in assisting employees on the job.



## LABOR STANDARDS

# PRINCIPLE 4

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The elimination of all forms of forced and compulsory labor.





# SOCIAL & LABOR OBLIGATIONS

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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 and the flexibility to work remotely upon management approval, safety policies at the workplace, 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 Global 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. We ask third parties to execute a Third Party Code of Conduct aligned with BDP's values reflected in our Global Code of Conduct.

BDP maintains an anonymous complaint form on its intranet website. The link to report complaints can also be accessed through a quick link in the Global Code of Conduct as well as in BDP Corporate Policies to ensure accountability with our ethical mandate, as well as a complaint hotline to report situations that violates BDP policy.

## LABOR STANDARDS

# PRINCIPLE 5

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The effective abolition of child labor.



## COMMITMENT

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

## PROCESS & SYSTEM

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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 are 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. Third parties are also expected to sign BDP's Third Party Code of Conduct where they agree to follow all local laws around Child Labor.

# BACKGROUND CHECKS

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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 staff are notified and trained with regards to the policy, and are accountable for adherence to it, as well as the Global 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.



## LABOR STANDARDS

# PRINCIPLE 6

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The elimination of discrimination in respect of employment and occupation.



# ANTI-HARASSMENT POLICY

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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, customers or third parties 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, the Global Code of Conduct and the employee handbook. The policy is also approved by the Board of Directors and is reviewed and updated annually.

Employees are encouraged to report any violations or breaches to management or anonymously through the reporting features BDP has available.

# EMPLOYEE TRAINING

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BDP conducts on-going Anti-Harassment, Diversity and Cultural Sensitivity Training for all employees to ensure that BDP maintains a workplace free from all forms of harassment.

BDP also has mandatory annual Global Code of Conduct training for all employees that outlines BDP's Anti-Harassment Policy.

# HARASSMENT COMPLAINT PROCEDURE

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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 Reporting System, Neighborhood Watch and/or BDP's anonymous hotline.



## ENVIRONMENT

# PRINCIPLE 7

Businesses should support a precautionary approach to environmental challenges.





# NEW GLOBAL ENVIRONMENT

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Now more than ever, the new global environment demands that companies evolve to adopt more environmental friendly and sustainable business practices. BDP recognizes that the world's natural resources are limited and fragile, and as such, is fully committed to being an industry leader in corporate sustainability.

We seek to operate in an environmentally responsible manner through education and compliance and our commitment to sustainable operations is rooted in our core values. Because we are a non-asset based company, we have the flexibility to carefully select providers that offer more sustainable solutions and ones who are aligned with our corporate values.

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 environment, health and safety in the forefront of our practices. Echoing this policy are several of BDP's programs: BDP Sustainability Program, the BDP EHS Program and Responsible Care®.

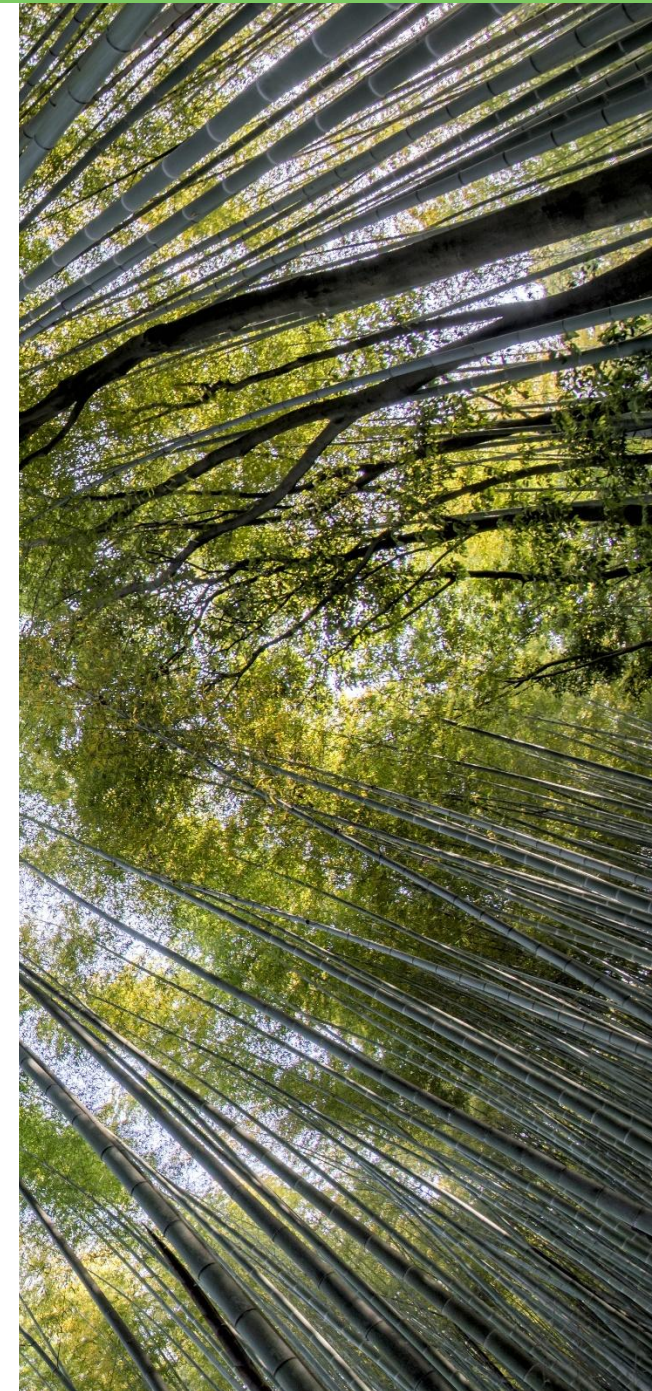
# BDP SUSTAINABILITY

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Sustainability 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 been an active member of the Clean Cargo Working Group (CCWG) since 2013. 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 these 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 (CDI). BDP is a Partner in the ACC's Responsible Care<sup>®</sup> Program now in its 30th year. At the end of 2018, BDP adopted the Global Logistics Emissions Council (GLEC) Framework. Moving forward, BDP will look to implement the framework into its supply chain.





# BDP EHS PROGRAM

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BDP has had a formal commitment to the environment for the past eight years, as the BDP Green 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 eco-friendly transit.

In 2015, the BDP Green Team expanded to become the Environmental, Health and Safety (EHS) Team. With the expansion, BDP established an EHS Ambassador network. The EHS Ambassador network allowed a global audience to be reached and the BDP EHS message has become more effective. To achieve its goals and truly have a global presence, the EHS network combined EHS and Responsible Care<sup>®</sup> (RC) Ambassadors to represent for both the EHS and RC initiatives. Since 2016, the EHS/RC Ambassador Network has grown over thirty-one percent, with 92 Ambassadors to date.

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 is to bring together the ideals and standards embedded in each area and communicate these principles to our global BDP community.



# Currently, BDP is proud to report the following achievements in 2018 and essential goals for 2019:

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- 1** Increased communication and awareness in all offices regarding recycling, paper reduction and energy conservation;
  - Employee engagement via monthly internal global bulletins, social networking sites and a global networking site for all EHS/RC Ambassadors to share ideas, perspectives and enhance BDP's goal of a corporate-wide awareness of sustainability.
- 2** Environmental events in 2018 included:
  - Earth Day celebration with awareness events for all employees focusing on recycling, reduction of waste, reuse of items and education about local and organic foods;
  - EHS Week celebration including events to promote reductions of waste, exercise, and education about EHS and RC.
- 3** At the end of 2018, EHS/RC Ambassadors grew by over thirty-one percent. Currently, there are 92 EHS/RC Ambassadors across the globe and this number will continue to grow in 2019. 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 and Responsible Care<sup>®</sup> guidelines
- 4** A new education course was released in 2018 detailing how to create a paperless office. This course was released globally and was based on the success of BDP Rotterdam creating a paperless office and the step by step process they took to achieve this. To date, thirteen percent of employees have completed this course. In 2019, BDP will look to grow this percentage.

# Currently, BDP is proud to report the following achievements in 2018 and essential goals for 2019:

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- 5** In 2018, BDP teamed up with a client to complete a Logistics Emissions Accounting and Reduction Network (LEARN) Project focused on measuring emissions using the Global Logistics Emissions Council (GLEC) Framework and identifying opportunities for efficiencies on selected trade lanes.
  - The goal of this project was two-fold: to test and validate the GLEC Framework methodology, and seek out more efficient ways to ship its client's product.
  - In using the GLEC Framework, BDP and its client were able to calculate CO2e emissions for all logistics activities.
  - If the alternative routes with the lowest CO2e emissions were chosen, BDP's client could see reductions in emissions from these selected routes by thirty-eight percent.
- 6** In 2018, BDP responsibly disposed of electronic waste through a third party contractor who ensured the proper recycling of the e-waste.
- 7** In 2017, BDP completed the Together for Sustainability (TfS) audit program to assess and improve sustainability practices within the supply chains of the chemical industry. The program's objective is to create standards for sustainability supply chains, share assessments, raise awareness, make continuous improvements and promote best practices.
- 8** BDP has received a silver-level rating from Ecovadis, which operates the first collaborative platform providing supplier sustainability ratings for global supply chains, for its commitment to corporate social responsibility.
- 9** ISO 14001 (Environmental Management System) Certification for the below countries/regions: Asia, Spain, Germany
- 10** SQAS Certification in our Belgium and France offices.

## ENVIRONMENT

# PRINCIPLE 8

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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. From 2015 through 2017, BDP was an elected member of the CCWG steering committee.

BDP continues to be an active member of the CCWG to date.

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
- The ability to help influence the development of tools, standards and methodologies for improving environmental performance across the intermodal value chain.





# RESPONSIBLE CARE ®

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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 voluntary global initiative that drives continuous health, safety, and environmental quality and community awareness of chemicals throughout their life cycle. In 2018, the ACC and its Members and Partners celebrated a milestone of 30 Years of Responsible Care ® in the US.

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 ® initiatives align with BDP's safety culture. Chemical products accounted for 65% of BDP's global shipment activity in 2018. BDP's internal commitment to Chemical Brand Dominance continuously drives our organization to provide the most ethical, secure and safest value chain solutions to our chemical customers. Most importantly, our top priority is to keep our workforce communities safe.

While BDP has achieved accolades for its commitment to the Responsible Care ® principles and management practices in 2016 and 2017, there is always work to be done. Chemical safety and risk management are 24/7 activities that require the teamwork of BDP people around the global to achieve. We have a "Call to Compliance" when handling chemical shipments as education, risk awareness, and attention to detail are expected at every corner of the BDP world.

**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 ® ;
- Endorse the Responsible Care ® Global Charter;
- Measure and publicly report performance on an annual basis;
- Implement the ACC Security Code;
- Obtain independent certification that a management system is in place and functions efficiently and in line with professional specifications.

# OUR RESPONSIBLE CARE® STORY

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Our organization experienced another year of growth and continued education in Responsible Care®.

**DGPro Education Program:** As complacency invites vulnerability, BDP continuously challenges itself to be a dynamic and ever-changing organization. BDP's Compliance Center of Excellence launched a new dangerous goods certificate program in 2017: Dangerous Goods Professional (DGPro). DGPro complements our existing hazardous materials training program and is available globally on BDP University. The certificate program is designed to develop hazardous materials knowledge leaders and demonstrate BDP's commitment to the chemical value chain, continued employee education, and our safety culture.

**EHS and Responsible Care® Ambassador Program:** BDP has continued to expand our EHS and Responsible Care® Ambassador Network around the globe. In 2017 and 2018, we experienced a timelier and more consistent communications channel to deliver core messages and actions required by BDP offices globally. Further, BDP created a Google+ site to centralize Ambassador communications and learnings. The site has over 100 posts from our Ambassadors around the globe that enhance our initiatives in EHS and Responsible Care®. Ambassadors, in collaboration with local leadership, are tasked with sharing this information and / or implementing procedures within their regional and local offices. As such, Ambassadors are now more informed and have a greater awareness to the purpose and value of EHS and Responsible Care®. Employees are more engaged with an expanded network, more knowledgeable of our chemical processes and expectations, and have even more opportunities to collaborate to drive improvements.

New in 2018, BDP launched our first EHS and Responsible Care® Ambassador Network Engagement Survey. The goal was to understand what kinds of continual improvements would make the network even more effective. The survey trends provided much insight and opportunities for planning 2018 and 2019 activities in four key areas: Employee engagement, communications, education, and leadership support.



## ACHIEVED RESPONSIBLE CARE<sup>®</sup> MANAGEMENT SYSTEM<sup>®</sup> ATTESTATION

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BDP North America-US is in compliance with the requirements of the American Chemistry Council, Responsible Care<sup>®</sup> Management System<sup>®</sup> (RCMS), Technical Specification document RC101.04.2013.

RCMS includes 7 management practices that focus on Process Safety Code:

1. Leadership and culture
2. Accountability
3. Knowledge, expertise and training
4. Understanding and prioritization of process safety risks
5. Comprehensive process safety management systems
6. Information sharing
7. Monitoring and improving performance

## NAMED 2016 & 2017 RESPONSIBLE CARE<sup>®</sup> PARTNER OF THE YEAR

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The Responsible Care<sup>®</sup> 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 2017 entry to the award program chronicled our new DGPro Education Program. In addition, all new and current employees who worked a non-hazardous materials customer account were required to complete the first DGPro introduction course as a foundation to enhance employee-wide awareness to BDP's commitment to chemical safety in the transportation sector.



**RESPONSIBLE CARE<sup>®</sup>**  
OUR COMMITMENT TO SUSTAINABILITY

**PARTNER OF  
THE YEAR**  
**2016 & 2017**

# WHAT WE WANT TO ACHIEVE

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

- Responsible Care<sup>®</sup> Global Charter Awareness
  - Formal bi-annual process with executive leadership and employee signatures
- Responsible Care<sup>®</sup> Guiding Principles
- EHS & Responsible Care<sup>®</sup> Ambassador Network
- Educational Trainings on BDPU
  - Responsible Care<sup>®</sup> Overview
  - Introduction to Process Safety
  - Procedures to Incident Reporting
- Awareness and outreach to regional Responsible Care<sup>®</sup> organizations to connect with BDP customers and prospects
- Connect Responsible Care<sup>®</sup> as a core component of a Culture of BDP Safety
- Understand where risks “live” in our processes
- Drive continual improvement in our day-to-day operational and facility processes
- Make Responsible Care<sup>®</sup> and the business value generated an ongoing dialogue with BDP customers

## RESPONSIBLE CARE<sup>®</sup> REACHES ONE BDP

- Employee focus on Process Safety and Product Stewardship in all that we do
- BDP is guided by the ACC and our chemical customers to continuously improve our processes
- Drive traffic to the BDP Responsible Care<sup>®</sup> site to enhance education, improve content and format to meet regional needs
- Connect global offices with Responsible Care<sup>®</sup> organizations and affiliations through the International Council of Chemical Association (ICCA)

### 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.



# EDUCATION

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## DGPro Education Series

BDP launched a new 12-course curriculum in addition to the required and established DG training program (IMDG/IATA), which is designed to provide employees with all tools necessary to recognize the uniqueness of dangerous goods. In order to maintain DGPro certification, employees must take DG training courses regularly. As of the end of 2018, in excess of 900 BDP employees have taken the DG Pro training.

In addition to the new DGPro education series, BDP adopted a unified Global Dangerous Goods Policy to ensure that all BDP offices were compliant with dangerous goods laws and regulations and to minimize risk for damage or loss during the handling and transportation of dangerous goods or materials.

## 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

## EXPANDING BDP EHS & RC AMBASSADOR NETWORK

BDP has expanded its EHS & Responsible Care<sup>®</sup> Ambassador network in each office globally. Ambassadors receive core communication and guidance as they collaborate with local leadership and teams to implement key initiatives, training opportunities and communications. Communications include internal and external updates to policies and processes developed by the BDP Regulatory Compliance Center of Excellence relevant to the chemical global logistics sector.

This provides opportunities for more employee engagement and support to local offices in need. The Ambassador network encourages employees at all levels to engage local customers in a Responsible Care<sup>®</sup> conversation through sharing involvement information and chemical best practices.

The network has evolved into a collaboration hub where new ideas and improvements are channeled to the Regulatory Compliance team for continuous improvement. Each year in November, BDP People around the globe celebrate EHS Week. The celebration includes five days of activities and online contests while sharing food, fun, and photos. New in 2018, the event included one day dedicated to Responsible Care<sup>®</sup> learnings. The takeaway was an opportunity to connect BDP people to the value of Responsible Care<sup>®</sup> and our ongoing commitment to chemical safety and security in the value chain.

## BDP RESPONSIBLE CARE<sup>®</sup> COMMITTEE

The committee has 35 members from all levels of the organization. The team meets quarterly to advance Responsible Care<sup>®</sup> initiatives. The goal is to improve BDP's operational process and operating systems to provide the highest quality of safety to our employees.

Guided by the American Chemical Council's Responsible Care<sup>®</sup> program, the committee seeks to understand and implement new policies, codes and opportunities for the safest handling and data accuracy of hazardous chemical shipments in the supply chain including:

- Internal Processes
- Operating Systems
- Risk Management
- Carrier Selection
- Employee Education
- Regulatory & Security Compliance
- Government Reporting
- Documented policies & procedures



## RESPONSIBLE CARE<sup>®</sup> GLOBAL CHARTER BIANNUAL UPDATE

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Every 2 years employees must renew their pledge and commitment to the BDP Responsible Care<sup>®</sup> Global Charter. To keep employees engaged and current in Responsible Care<sup>®</sup> education, BDP sees great value in re-introducing the global charter globally. Responsible Care<sup>®</sup> campaign content includes webinars customized by region, local town hall meetings and a celebration signing where BDP People pledge their understanding and commitment to the key elements. Signed posters are displayed in the common areas in each office as a reminder of employee commitment.

## HAZARDOUS CARGO VISIBILITY via BDP GLOBAL VISIBILITY TOOL (BDP SMART)

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Chemical logistics involves added risk: tracking hazardous cargo is crucial to managing chemical supply chains. In response to this challenge, BDP has 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 and supports a prompt response to hazardous incidents.

## ANNUAL DG SUMMARY REPORTS BY REGION & COUNTRY

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BDP communicates DG activity reports designed to identify the hazardous chemical products exported around the globe.

The goal is to understand the trending dangerous goods products transported throughout the supply chain. Annual reports are generated and communicated for each country and region.

## ENVIRONMENT

# PRINCIPLE 9

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





## COMMITMENT

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**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.**

## ELECTRONIC DOCUMENT MANAGEMENT

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BDP continues its efforts to become paperless via its Document Management System (DMS). DMS has been 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 three years, BDP Rotterdam, BDP Colombia and BDP Philadelphia have utilized DMS in innovative ways to make their offices and processes more paperless. In 2018, we released an education course to guide other offices to implement DMS more effectively.

## PAPERLESS MARKETING COMMUNICATIONS

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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 the past three years. Marketing has made several advances to decrease BDP's carbon footprint in 2018 and will continue to expand upon these initiatives in 2019.

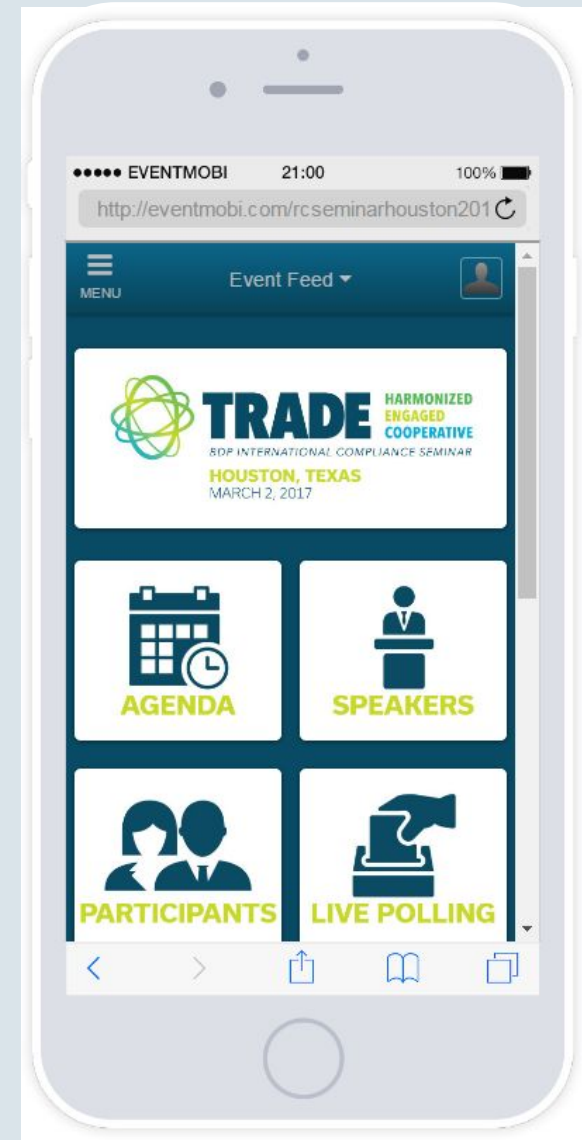
# GREEN CONFERENCES

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 2018, 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.

# VIDEO CONFERENCING / WEBINARS / 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.



# ANTI-CORRUPTION PRINCIPLE 10

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



## COMMITMENT

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**BDP is committed to full compliance with both the letter and spirit of 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.**

## PROCESS & SYSTEM

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**Policy:** BDP operates under a Global Code of Conduct ("the Code") along with the Global Anti-Corruption and FCPA Policy. The Code and Policy 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. We request that all agents sign a Third Party Code of Conduct in order to do business with BDP. This Code is to be signed on an annual basis.

**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 mandatory for all principals and key employees involved in sales, marketing and procurement. All employees are also required to take the training during new employee onboarding.

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. The hotline and quick link to report a complaint are also listed in the Global Code of Conduct as well as the Anti-Corruption and FCPA policy to provide quick access to employees.

# TRAINING

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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.

Employees then sign electronic certifications after training completion where certifications are kept on file for all employees. The certification states that the employee has completed the training and will adhere to BDP's Compliance Program. All certifications must be acknowledged annually.

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 provides 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.

In 2018, the BDP Legal Department presented its first Town Hall Meeting regarding Anti-Corruption and Violations entitled "The Ethical Edge." Presentations were held at different times so employees could dial in globally. The town hall was mandatory for all employees and will be reoccurring on an annual basis going forward to enable employees to be engaged and ask questions live regarding the Code of Conduct and BDP Policies.

**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.

In 2018, BDP Legal hosted "A Fireside Chat with Richard Bistrong" where Richard spoke to BDP management about his experience on foreign bribery, ethics and compliance issues from the front-line perspective.

## 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.

## 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 anti-corruption and must sign a Third Party Code of Conduct.

BDP is currently working to adopt regional and global vendor vetting policies to ensure that all business partners are compliant and ethically sound with a uniform process that can be applied globally. 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.

### 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 auditing system to detect criminal conduct. The Officer is also responsible for periodic review of the current program and policies and to making updates as needed per new regulations.

BDP has been certified in anti-corruption by TRACE International from 2015 through 2018 and is the due diligence process for the 2019 application. 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.

# ANTI-CORRUPTION

BDP's certification terms for each consultant, intermediary and joint venture partner require the certification that the Third Party:

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.

The Third Party must also sign an agreement with terms around Anti-Corruption and reporting possible violations immediately as well as the review and sign off of BDP International's Third Party Code of Conduct before conducting business with the organization..



BDP has been named one of Ethisphere Institute's World's Most Ethical Company for the years 2016, 2017, 2018 and 2019.

"This award recognizes those companies who align 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.