

since 1865

Bertling Logistics Group

BERTLING – WE DELIVER OUR PROMISE.

BERTLING LOGISTICS GROUP 2021 COP

November 2021



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To our valued stakeholders,

We are proud to confirm our continued support for the 10 principles of the UN Global Compact. This is the 9th year that Bertling has been a signatory of the UNGC and empowered by our brand values, the company and its employees have worked diligently to uphold the UNGC pillars of human rights, labour, environment and anti-corruption.

These pillars are incorporated into our business culture alongside our commitment to honesty, integrity and the promotion of an open and diverse corporate culture.

We believe the UNGC guiding principles steer companies towards making choices that are both good for business, society and environment.

Through the pages of this Communication on Progress we seek to communicate to our clients, sub-contractors, our employees and the communities which we impact, the actions that we are taking to live and operate by these principles.

Yours sincerely,

Colin MacIsaac CEO of Bertling Logistics



INTRODUCTION

The pillars of the UNGC have been imbedded in our values and code of conduct since 2012. Our values and code of conduct and the Bertling ethical business statement remain the means by which we publicly commit and communicate the company's policies and values. Both documents are published on the Bertling website <u>www.bertling.com</u>.

HUMAN RIGHTS

Assessment Polices and Goals

The values and code of conduct contains the following values statement on Human Rights:

\rightarrow We promote human rights

Bertling is committed to promoting human rights. As such, Bertling respects employees' right to freedom of association, rejects the use of child, forced or bonded labour in any of our operations and expects the same standards from our partners and suppliers.

\rightarrow We promote diversity

Bertling's success over the last 156 years has been built on the promotion of shared common values that guide our daily activities. We respect our individual abilities and actively promote tolerance and diversity at every level of our business. We recognize and promote creativity and the benefits to be gained from drawing on the experience and knowledge of Bertling's people from all parts of the world. As such, Bertling is committed to providing equal opportunities and to avoiding any form of unfair discrimination in employment.

Implementation

Every employee in the Bertling organisation is required to sign a statement confirming their commitment to abide by the policies in the Bertling's Ethical Business Statement and the values and code of conduct. This commitment is also expected of our service providers.

We have reviewed the risk profile of our operations in the light of the UK Modern Slavery Act and as a result we updated our values and code of conduct to emphasis the company's policy to combat modern slavery and strengthening our service provider procurement, selection and approval procedures to reflect this.

The face to face training programme continues supporting our well established web-based training. The training is provided by the Global Director of Risk Quality and Compliance and focuses on demonstrating leadership commitment in this area, making our Ethical Business Statement and values and code of conduct relevant to the business and culture of each region.

Training is given to staff to help them recognise evidence of modern slavery and how to report it. Staff in our Aberdeen have developed a vessel checklist for load outs at ports that includes looking for evidence of modern slavery and mistreatment of workers at ports and/ or on-board ship. The Bertling Helpline is also promoted as a communication tool by which any breaches of policy or concerns including modern slavery can be raised in a confidential way.



Measurement and Outcome

The company has evaluated its policies and performance in the area of human rights alongside other risks the company is exposed to as part of its enterprise risk evaluation process.

The outcome of the process is a global risk inventory that details core risks and how they are being addressed. This was updated in 2019 to take into account the risk of modern slavery. The risk inventory has been fully reviewed and revised in October 2021, and a new set of risk, quality and compliance KPI's introduced in 2021.

Compliance with the human rights policies is the responsibility of the local Managing Directors and any concerns or non-compliances are raised in the Monthly Office Reports submitted to the CEO.

Oversight of the business processes designed to integrate the policies and values into our business culture and operations is the responsibility of the Global Director of Risk, Quality and Compliance. Bertling's internal auditor evaluates performance against key risks and Bertling's values and code of conduct through an internal audit schedule covering all offices. The results of the audit programme are evaluated by the Global Director of Risk, Quality and CEO on a monthly basis and corrective actions taken to ensure the efficacy and continued improvement of Bertling management systems in this area.

LABOUR

Assessment Policy and Goals

The values and code of conduct contains the following values statement on Labour Rights that gives a clear commitment to the freedom of association:

\rightarrow We promote human rights

Bertling is committed to promoting human rights. As such, Bertling respects employees' right to freedom of association, rejects the use of child, forced or bonded labour in any of our operations and expects the same standards from our partners and suppliers.

Bertling's values and code of conduct also gives a clear statement on the health and safety of our employees.

We have reviewed the risk profile of our operations in the light of the UK Modern Slavery Act and as a result we have updated our values and code of conduct to emphasis the company's policy to combat modern slavery, introduced awareness training and strengthening our service provider procurement, selection and approval procedures to reflect this.

\rightarrow We promote a safe working environment and employee security

Bertling is committed to providing all employees with a safe working environment and protecting their well-being. We take all possible steps to reduce the risk of injuries or incidents at our places of work, based on our health and safety policies and procedures which, in turn, are informed by local risk evaluations completely revised to take the treatment of Covid-19 risks into account in every country we operate.



Violence and threatening behaviour in the workplace will not be tolerated. Likewise, working under the influence of alcohol or other legal and illegal drugs and substances undermine our efforts to promote a safe working environment and will not be tolerated at any time. By the nature of our business, we need to be present in some of the more challenging and politically unstable parts of the world. Through monitoring, regular risk assessments Bertling will ensure that appropriate measures are taken to protect the security of its employees.

Bertling's values and code of conduct gives a clear commitment to the elimination of discrimination in respect of employment and occupation and commitment to equal opportunities. All Bertling employees receive a written statement setting out their terms and conditions of their employment and a set of human resources policies are deployed to guide the interaction between Bertling and its people across the globe.

Implementation

Every employee in the Bertling organisation is required to sign a statement confirming their commitment to abide by the policies in the Bertling's Ethical Business Statement and the values and code of conduct. This commitment is also expected of our service providers.

The Bertling Compliance Helpline has been promoted with staff to report cases of bullying and unfair treatment.

Outside the work environment, in the countries in which we operate we aim to promote the values of the company and support the local community. One of the long-term charity projects we support and collaborate with is "Shanyrak" Kazakhstan, a social organisation that helps those leaving the orphanage find employment by providing them with career opportunities, career advice, and by creating a platform to help them realise their potential. Over several year now this has helped many unfortunate youngsters find a job.

In 2020 and 2021 Bertling donated technical devices (TVs, laptops, etc) to Shanyrak to allow the children to attend home schooling during the ongoing pandemic.

Other projects we supported in 2020 and 2021 were:

- Zeiin Medical Care Center for Children in Kazakhstan
- Friends of Green Suriname (<u>https://www.conservation.org/suriname/programs/friends-of-green-suriname</u>)
- Florida Breast Cancer Foundation (<u>https://www.floridabreastcancer.org/</u>)
- Tiny Changes (https://tinychanges.com/)
- Ethiopia Media Project (<u>https://www.ethiopiamedicalproject.com/</u>)
- Save the Children (https://www.savethechildren.de)



\rightarrow Human Rights

The Company records gender diversity within the business across the globe. As the business operates in 33 countries globally it does not monitor cultural diversity.

→ Employee Safety and Security

We conduct regular drills, awareness programs, and anomaly reporting exercises, and measure and report regularly on our health and safety performance. Training is provide to staff on Modern Slavery including how to recognise it and how to report it.

Measurement of Outcomes

The company has evaluated its policies and performance in the area of labour rights and employee safety and security alongside other risks the company is exposed to as part of its enterprise risk evaluation process. The outcome of the process is a global risk inventory that details core risks and how they are being addressed and this was fully reviewed and revised in October 2021.

Compliance with the labour rights and employee safety and security policies is the responsibility of the local Managing Directors and any concerns or non-compliances are raised in the Monthly Office Reports submitted to the CEO.

Incidents affecting the health and safety of employees are recorded and reported globally. All incidents are investigated, their root cause identified and corrective actions communicated and implemented globally to ensure continuous improvement.

Oversight of the business processes designed to integrate the policies and values into our business culture and operations is the responsibility of the Global Director of Risk, Quality and Compliance. Bertling also has an internal audit position in the company with purpose of evaluating performance against key risks and Bertling's values and code of conduct through an internal audit schedule covering all regional head offices.

The findings of the audit programme are evaluated by the Global Director of Risk, Quality and Compliance and CEO and corrective actions taken to ensure the efficacy and continued improvement of Bertling management systems in this area.

ENVIRONMENT

Assessment Policies and Goals

The values and code of conduct contains the following value statement on the environment:

→ We promote concern for our environment

As an active signatory of the United Nations Global Compact (UNGC) and supporter of the UN Sustainable Development Goals (SDGs) we are working on projects and ideas on how to reduce our impact on the environment and thus contribute to the UN's 2030 Agenda for Sustainable Development.



In 2021 we implemented an improvement programme certifying all our offices worldwide to the ISO 14001:2015 standard. This global certification is now centrally maintained and controlled.

The environmental footprint of Bertling is largely the movement of cargo by 3rd party subcontractors by road, sea and air and is covered by our corporate objectives including, "Reductions of Risks and Impacts to the Environment" and "Reductions in CO₂ emissions through strategic route planning including reductions in air and road freight volumes".

The Bertling quality system contains the following policies on the environment:

- Written company policy on environmental issues, including prevention and management of environmental risks
- Written Corporate Environmental Policy.
- Policy requiring business partners and suppliers to adhere to the environmental principles
- Written procedure requiring suppliers to adhere to requirements by returning a completed pre-supply questionnaire.

Bertling recently revised its environmental policy statement in April 2020.

→ Bertling's Environmental Policy Statement

Bertling's strategy is to deliver sustainable growth in shareholder value by becoming the project freight management partner of choice to the upstream and downstream oil and gas, energy, construction, mining and government infrastructure sectors.

Bertling will achieve this by providing best practice, cost effective freight management, logistics and material control services through a process of continual improvement that will meet or exceed customer expectations.

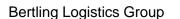
Bertling senior management's commitment to continual improvement will be delivered by the Environmental Management System's integration into its core business processes, providing a framework that will allow its performance to be measured, evaluated and improved via management review processes at key management levels within the company.

In implementing this policy Bertling recognises that our operations have the potential to impact adversely on the environment. Bertling is committed to prevention of pollution and to protecting the environment, and will achieve high performance standards for energy use and minimising environmental impact throughout our organisation. Bertling will measure the achievement of the aims and objectives of this policy.

Bertling believes that every one of our personnel should have a personal and collective responsibility to protect the environment, to promote the use of sustainable resources and to improve process efficiency.

Our central aims and objectives are:

• To manage corporately and at business level the effective use of resources to prevent the generation of waste and pollution and to ensure sustainability



• To comply with, and where practicable exceed, the requirements and targets set by existing environmental legislation and regulations and to plan ahead for future compliance.

Bertling /

- To use impact assessment to minimise any adverse effects of our operations on the environment and where possible to improve the environment.
- To, so far as reasonably practicable, use transport means that minimise pollution and the consumption of non-renewable resources.
- To embrace Customers and internationally recognised objectives when setting internal targets.
- To provide and maintain so far as practicable a pollution free environment for our personnel and the wider community in which they interact.
- To take into account the environmental impacts of our raw material sourcing and operations on habitats, species diversity and natural beauty.
- To provide a common framework, which adopts and supports best practice, for energy and environmental management at all levels within our company.
- To allocate appropriate resources to ensure the effective implementation of this policy.
- To encourage the development of similar policies within our supply sources.

The aim of this policy will only be achieved through leadership, responsible management, commitment and ownership of these issues by Bertling personnel.

Implementation

Every employee in the Bertling organisation is required to sign a statement confirming their commitment to abide by the policies in the Bertling's Ethical Business Statement and the values and code of conduct. This commitment is also expected of our service providers.

By the continued implementation of Corporate Integrated 9001/14001/45001 system globally through all offices, which have achieved certification in all regions across the globe.

- Through e-learning programme
- Implementation and reporting of Key Performance Indicators on waste reduction
- Implementation of Corporate level objectives
- Implementation of Corporate Management system globally
- Appointment of HSE manager and HSE representatives

Measurement of outcomes

To our clients we now offer a set of environmentally conscious services and tools to help them measure, evaluate, report and eventually reduce their carbon footprint in line with their corporate KPIs and to foster their sustainability strategies.



Bertling Ecological Footprint Tracker

At Bertling we are fully aware of the impact global logistics services via air, rail, road and sea have on the environment. However, without these essential services global supply chains would stop moving and the worldwide distribution of goods would not be guaranteed.

The current Covid-19 pandemic has proven more than ever that when the whole world comes to a halt to battle a virus, global trade is essential to keep the world and people's lives moving and ensure a certain degree of "normality". The pandemic has also created a new and increasing level of environmental awareness among companies to develop sustainability programs and carbon neutral goals and concepts to be better prepared for crises in the future and to make the world a better place, also for future generations.

Every carbon neutral program starts with knowing the environmental impact including emissions our clients services used have on the environment. The Bertling's Ecological Footprint Tracker provides this visibility. Our Ecological Footprint Tracker is able to calculate our clients CO₂ footprint of the services used and all shipment-related emissions from project start to finish. We have partnered with EcoTransIT, to provide clients with automated calculation and analysis of energy consumptions and emissions across the whole supply chain. As a UN Global Compact signatory and supporter of the UN Sustainable Development Goals we promote the awareness for carbon neutral programs amongst our clients by providing this service for free.

Clients can calculate their estimated footprint, when the shipment is created, and/or their actual footprint, when the shipment is conducted, taking all transport modes into account. The results are presented in real-time on highly visual dashboard attached to client's IT platforms to manage and track their projects, which enables them to:

- Compare the environmental impact of different shipments before and after they took place
- Create environmental awareness
- Help define environmental goals, sustainable strategies and KPIs to reduce their carbon footprint
- Automate the emissions calculations of large transport quantities

We strongly support our contractors in setting ambitious targets to reduce their carbon footprint to offer services that help our customers to minimize their Scope 3 emissions and encourage them to compensate the remaining so far unavoidable leftovers.

Bertling Logistics Group provides several pre-selected environmentally highly integrated projects that do reduce/remove greenhouse gas emissions from the atmosphere for customers to choose from to compensate for the services used.

Bertling Enviro

We have become expert in transporting RDF (Refuse Derived Fuel) from the UK to Scandinavia. Bertling Enviro operates within the processed waste and recyclables industry, using our extensive knowledge and experience in global logistics and waste management to serve as a single source provider, with solutions for handling all incoming and outgoing waste efficiently and sustainably at every step of the supply chain. Using processed waste as an alternative fuel has positive effects for the environment, and Bertling Enviro enables countries such as the UK,



who do not have enough infrastructure and incineration plants to take care of all their waste, to export it to Sweden where their incineration plants extract energy from the UK waste, producing energy and electricity instead of using fossil fuels. Not only is the waste used as a source of fuel, but not disposing it to landfill has the added benefit of avoiding the generation of methane gas, a gas which has a higher detrimental impact on the global environment than CO2.

Bertling Bulk Liquid Logistics

Bertling operates a bulk liquid logistics business, where we transport non-hazardous liquids in FLEXItanks, ISOtanks, IBC's or drums. We have now designed our Bertling-designed FLEXItanks to be recyclable and/or reusable. We have developed a steam heating system that can be attached to the FLEXItanks which enables them to be reused multiple times. Wherever possible we promote the recovery and reuse of our bulkhead system and steel bars as well as our reusable heating pad. Bertling also ensures that through our partnerships with waste management companies including Bertling enviro that our flexitanks are also recovered and managed in the most environmentally way possible offering recycling of the PE and PP layers wherever possible. We are currently undertaking a major recycling project with Bertling Enviro to look at the most cost effective and environmentally friendly ways of reusing/disposing of the Bertling flexitank.

ANTI-CORRUPTION

Assessment Policy and Goals

The Bertling ABC Compliance Programme is based upon clearly defined policies endorsed by Bertling Shareholders and Senior Management. The key policies are the Ethical Business Statement and the values and code of conduct.

The values and code of conduct contains the following value statements on anti-bribery and corruption:

\rightarrow We promote responsible interaction with government bodies

Bertling operates in various unregulated markets and therefore only occasionally has interactions with governments in the countries where we operate. We are committed to openness and honesty in all dealings with governments and support constructive dialogue with regulators. We will never make any political payments, and where we need to raise an issue with a government we will do so with our relevant trade body in an open and transparent way.

\rightarrow We comply with international laws

Bertling does business globally, which means we are subject to, and uphold, the laws and regulations of many different countries. Whilst this code establishes our global principles of business conduct, where differences occur as a result of local customs, norms, laws or regulations, we apply the code principle or legal requirement which sets the highest standard of behaviour.



\rightarrow We comply with bribery and anti-corruption laws/regulations

Bertling completely rejects all forms of bribery and corruption and adheres to the relevant laws of the countries where we operate in this regard, such as the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. We will not offer or accept gifts or hospitality of more than token

value. We expect our staff and those we do business with such as customers, suppliers and any intermediaries to adhere to the same standards.

\rightarrow We comply with export regulations and trade embargoes

Given the nature of our business, Bertling continuously monitors export regulations and trade embargoes around the world.

Due diligence on 'who', 'what' and 'where' we are moving freight, together with license and automated customs checks, are crucial steps we take to ensure that we comply with all relevant trade regulations across the globe and provide peace of mind for our customers, as well as ourselves.

Implementation

The Bertling ethics and compliance programme has been designed to meet the requirements of the FCPA and UK Bribery Act 2010 amongst other country's compliance legislation. The programme has an ethical business statement and an employee values and code of conduct as would be expected from any compliance programme, however, Bertling has codified how it will meet these legislative requirements in a list of business principles and practices known collectively as the Bertling Assessment Framework. These 73 business principles are organised into management and business functions outlined below:

- 1. Top level commitment
- 2. Communication and training
- 3. Risk assessment
- 4. Due diligence
- 5. Policies and Procedures by business function
 - a. Sales and Marketing
 - b. Procurement
 - c. Human resources
 - d. Finance and accounting
 - e. Government and regulatory affairs
 - f. Import and export controls
- 6. Compliance and monitoring

Where these principles needed to be applied and how to do it effectively is covered under risk management and business integration and overseen by internal and third party audit.

Our programme is risk based, prioritising the identification and mitigation of the business and geographical areas of highest exposure. Compliance risks have been evaluated globally from the top down as part of a two year holistic enterprise risk assessment and from the bottom up by



local office risk assessments. The risk based approach has fundamentally changed the way Bertling manages risk within its business operations, resulting in the re-writing of its management system and the development and implementation of mitigations that would be effective in the local business environment in which they were used.

In 2021 as part of the ongoing improvement programme Bertling selected four major offices, Singapore, Hamburg, Houston, and London, to be certified to the ISO 37001 standard. Stage 1 audits have already been successfully completed with Stage 2 audits scheduled for early 2022.

Training

All staff are required to undertake compliance training, following a web-based training programme developed for Bertling by Trace International. Additional support is provided to staff at a higher risk of exposure to bribery and corruption such as sales managers, in the form of written policies, guidelines, face to face training and presentations on specific compliance topics like how to deal with a demand for a bribe.

Examples of additional support material:

- Gifts and Hospitality Procedure B_L-QHSSE-0022-A
- Gifts and Hospitality Guidelines B_L-QHSSE-0022 D
- Sales ABC Compliance Manual B_L-QHSSE-0022 C
- Bertling Compliance Programme Training Presentation
- How to Deal with a Demand for a Bribe (Presentation)

In 2021 a training programme was specifically developed for high risk staff and this training is now regularly delivered face to face to new staff by the Global Director of Risk Quality and Compliance.

Sub-contractor Management

As our business involves many third party stakeholders our compliance programme has to reach beyond the company and its employees to our clients and subcontractors. Externally we do this through our Trace International and UN Global Compacts memberships. Internally this is achieved through effective risk based sub-contractor management as well as training and client/ supplier forums. The integration of compliance within our business processes also extends into our IT business systems. All parties involved in every transaction are screened and all sub-contractors are overseen using our global in-house transport management system which is regularly developed and upgraded to align with improvements made in our compliance and sub-contractor management processes.

Sub-contractor management and oversight is critical to Bertling's compliance programme and the risk based procedure B_L-QHSSE-0014 is designed to prioritise limited resources to focus on high risk sub-contractors. Sub-contractor Categories have been assessed for potential risk exposures of different types including those related to bribery and corruption. Using the supplier category risk assessment as a guide, the office management chose appropriate approval and oversight criteria for that office, detailing what assurances and safeguards need to be in place to mitigate the identified risks and record these in a document called the Supplier Selection



Criteria. When a sub-contractor is evaluated using a pre-supply questionnaire, particular attention is paid to the responses to the sub-contractor category high risk areas. Following evaluation the sub-contractor is assigned a risk status and an approval status indicative of the level of oversight that a sub-contractor requires.

Network Agents are recognised as vital to Bertling's business but present a potentially significant compliance risk. In 2021 Bertling developed a programme to approve and oversee Network Agents designed to mitigate the compliance risks through the implementation of:

- A specific Network Agent contract
- Enhanced due diligence, selection and screening criteria
- Communication of and commitment to ethical policies when Network Agents conduct business on Bertling's behalf.

The approval and oversight process is all managed using the supplier approval function of Bertling's global transport management system BLU. This function was upgraded in 2020 to meet the requirements of the compliance improvement initiative.

On an ongoing basis each office holds a monthly sub-contractor management meeting to review sub-contractor approval, performance and oversight.

In this way the sub-contractor management process has been designed to prioritise oversight of high-risk sub-contractors, focussing on high risk business processes and using in-house IT system tools to minimise the workload and ensure the best and most effective use of limited resource.

The attitude to bribery and corruption is heavily influenced by the business environment in a particular country and/or industry. To highlight the importance of compliance to all stakeholders and to communicate that message whilst highlighting the compliance support structures available to help combat bribery and corruption throughout the supply chain, Bertling has organised and hosted a number of compliance forums over the years involving both clients and sub-contractors. Forums have been held in the UK, Kazakhstan, Singapore, Malaysia and Indonesia with Bertling clients, and suppliers sharing their experiences of compliance issues and exploring ways we can work more closely together to combat bribery and corruption.

Measurement and Outcome

The Bertling compliance programme has been developed and improved upon over a number of years. A timeline of the programmes development is attached showing key events in its history. The integration and effectiveness of compliance on the ground in each office is overseen by comprehensive internal and external audit schedules and continuous improvements have been made following regular reviews of their findings.

Internal audits of the ABC Compliance programme are undertaken by the Global Director of Risk Quality and Compliance and also as by the Bertling Group Auditor as part of an audit of key business risks. These are conducted according to a schedule agreed with the CEO.

The performance of the compliance programme and ongoing compliance development initiatives are reviewed at regular monthly meetings between the CEO and Global Director of Risk Quality and Compliance.



Improvements continue, including:

- Transition of all Bertling offices to a global ISO certificate to ISO 9001, ISO 14001 and ISO 45001 standards and standardisation of ethics and compliance procedures, using Bertling proprietary document management system, the BLU Document Composer.
- Certification of key offices (London, Singapore, Hamburg and Houston) to ISO 37001.
- Inclusion of anti-bribery and corruption key performance requirements (KPR) for all offices, measured and reviewed monthly by the CEO and leadership team.
- Inclusion ethics and compliance targets in Bertling ISO 9001 quality objectives
- Specific anti-bribery and corruption objectives for offices certified to ISO 37001

NEXT STEPS

- Sustainability Strategy & Report for Bertling Logistics
- Further development of our Ecological Footprint Tracking Application including Offsetting
 Project Solutions
- Sustainability Certificates for our clients
- Sustainability Questionnaire for new and existing suppliers
- Office engagement and KPI for Sustainability
- Plant-My-Tree Initiative as part of CSR Policy
- Corporate Donation Platform and Charity Events on Betterplace
- Update of our Values and Code of Conduct
- Attendance of various Clean Energy Events throughout the year



Bertling Compliance Programme Timeline

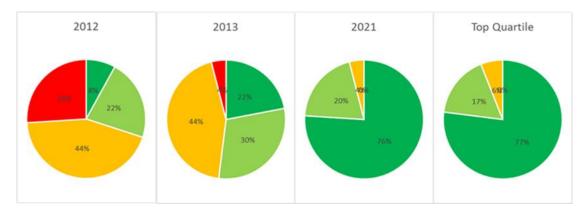
DATE/ TIME	EVENT
Jan-10	New ABC Compliance Programme Introduced
Jan-10	Group Head of Compliance appointed
Jul-10	Compulsory sign off of VCOC and Col for all employees
Nov-11	BLU Automated compliance screening of all transactions
Jun-12	Independent Bertling Helpline managed by Navex Global rolled out
Jan-13	Ist external audit by Good Corporation of UK Offices
Jan-13	Global Director of Risk Management appointed with responsibility for risk, compliance and quality
Jan-13	UN Global Compact signatory
Mar-13	Global holistic risk assessment conducted
Aug-13	2nd Good Corporation Audit of UK Offices
Sep-13	On-line ABC Trace Training compulsory for all employees
Oct-13	ISO 9001 procedures reviewed and updated to integrate ABC compliance pprogrammme
Jun-14	Compliance Forum UK
Sep-15	Global Risk Inventory (Register) developed for each Region
Jun-16	CHRSP's introduced and the means of managing key risks
Jun-16	SOP sub-process bricks developed to systematise group operations
Oct-16	Internal compliance audits begin
Nov-16	Compliance Forum Kazakhstan
Jan-17	3rd Party Audit Schedule established for Bertling Logistics Group
May-17	Good Corporation first Hamburg Audit
Jun-17	CHRSP's integrated into ISO 9001 procedures
Jun-17	BLU subcontractor management functionality and capability overhauled
Jun-17	Quarterly Compliance and risk management Review Meetings introduced
Aug-17	Compliance Forum Singapore
Aug-17 Aug-17	Compliance Forum Jakarta
Aug-17 Aug-17	Compliance Forum Kula Lumpur
Nov-17	Good Corporation Atyrau Audit
Feb-18	G&H policy and approval procedure introduced
	G&H Guidelines for Sales Staff introduced
Feb-18	
Feb-18	Good Corporation second Hamburg Audit
Apr-18	Good Corporation Singapore Audit
Sep-18	Good Corporation Sao Paulo Audit
Oct-18	Independent Bertling Employee compliance survey conducted by Navex Global
Apr-19	Internal auditor appointed and internal audit schedule developed covering quality compliance, risk and HSE
Apr-19	ABC guidance documention library published and shared with all offices
Apr-19	Introduction of a supplier specific VCOC (replacing sign of of Bertling Employe VCOC)
May-19	Webinar training sessions begin, available to all staff
Jun-19	Core Deliverable KPI's rolled out for all offices as part of the Office Monthly Report
Jul-19	Good Corporation Johannesburg Audit
Sep-19	Good Corporation Bogota Audit
Oct-19	Client and Supplier HSE and Compliance Forum Atyrau, Kazakhstan
Jun-20	BLU Transport Management System global subcontractor NCR tracking introduced
Jul-20	BLU Transport Management System global subcontractor oversight & reporting
Sep-20	Good Corporation Audit of Miami and Houston
Apr-21	Global ISO 9001/ ISO 14001/ ISO 45001 Certification
Apr-21	Good Corporation Audit of Aberdeen, Middlesborough and Harrow
Apr-21	Introduction of new Navex Ethics Point Reporting System with QR Code reportingfor subcontractors
May-21	Good Corporation Audit of the Bertling Logistics Global Compliance System
July	Development of new training programme for operational staff
	Singapore office ISO 37001 certification





To confirm the effectiveness of the Bertling compliance programme and its integration across Bertling's global business, in May 2021 the Bertling Global Compliance Programme and all the company's UK offices were audited by Good Corporation and awarded their top quartile status.

The charts below represent Good Corporation Audits of the Compliance Programme over the years, and demonstrates how the Bertling compliance programme has developed and improved to get to where it is today.



Chris Brooks

Global Director of Risk, Quality and Compliance

November 2021