



Trailer Services
TRAILERMADE SOLUTIONS

Integrity Concerns and TIP Ombudsman System

Issued: March 2018



Introduction

TIP wants employees to feel comfortable reporting concerns about violations of Company policies and procedures, to know that these concerns will be investigated objectively by subject-matter experts, and that appropriate remedial action will be taken when warranted.

TIP aims to establish a strong integrity culture, creating an environment that encourages employees to come forward with their questions and concerns without fear of retribution.

TIP has a concern-raising process that is built upon a network of ombudspersons (see Ombuds contact details page 10 and Ombuds structure page 16) and supported by managers and legal and compliance professionals.

TIP Ombuds are trained in procedures for receiving concerns, initiating investigations, monitoring case progress, and providing closure and prompt feedback. TIP Ombuds also take general questions on interpretation of TIP policies and give advice on the other resources available to answer your questions. Not all concerns raised result in investigations.

TIP Ombuds are focused on Integrity Questions and general questions on interpretation of TIP Policies. TIP Policy¹ and Non-Policy² cases that raised should be investigated by a formal investigation process by HR, Legal, or the Compliance Team and are outside the scope of the TIP Ombudsman program.

Confirmed violations of Company policies and procedures result in corrective actions such as training, strengthening routines, and simplifying or updating processes. Although many policy violations result from unintended mistakes, disciplinary actions are taken in appropriate cases involving intentional wrongdoing.

¹ What is a Policy Case? A Policy Case is when the person raising the concern thinks something may have happened that, if it did, would violate an integrity policy.

² What is a Non-Policy case? A Non-Policy case is when the person raising the concern thinks something may have happened that should not have happened (management unfairness or rudeness), but even if it did, the behavior may not violate a policy and may (or may not) be HR-related.



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How TIP Handles Integrity Concerns

When you raise an integrity concern, you make our Company stronger and protect your colleagues from harm. If you have a concern or a question on TIP policies, you can bring it up in any number of ways, to any number of people. If you choose, it can be confidential, or even anonymous. But know that if you identify yourself, we can follow up and provide you with feedback.

What happens when you raise an integrity concern?

1. Choose your channel

You can approach your Ombuds, Manager, HR/Compliance/Legal.

2. Decide if you're comfortable revealing your identity.

You can call an Ombudsman and talk about your discomfort before you decide. The Ombudsman can help you anticipate how the investigation might proceed if you don't identify yourself.

3. Raise your concern

If at any time you believe someone is retaliating against you because you raised an integrity concern, contact an Ombudsman or legal counsel right away.

4. Receive feedback (unless anonymous concern)

You will hear back at the end of the investigation, if you didn't elect to remain anonymous. The Ombudsman and investigators will respect your confidentiality as well as that of others involved in the case.



TIP Ombudsman Code of Ethics

The TIP Trailer Services Ombudsman Code of Ethics provides a common set of professional ethical principles to which TIP Ombudsman adhere.

Based on the traditions and values of Ombudsman practice, this Code of Ethics reflects a commitment to promote ethical conduct in the performance of the Ombudsman role and to maintain the integrity of the TIP Ombudsman Team.

The Ombudsman shall be truthful and act with integrity, shall foster respect for all members of the organization he or she serves, and shall promote procedural fairness in the content and administration of TIP practices, processes, and policies.

NEUTRALITY AND IMPARTIALITY

The Ombudsman, as a designated neutral, remains unaligned and impartial. The Ombudsman does not engage in any situation which could create a conflict of interest.

CONFIDENTIALITY

The Ombudsman holds all communications with those seeking assistance in strict confidence, and does not disclose confidential communications unless given permission to do so. The only exception to this privilege of confidentiality is where there appears to be imminent risk of serious harm.

INFORMALITY

The Ombudsman, as an informal resource, does not participate in any formal adjudicative or administrative procedure related to concerns brought to his/her attention.



TIP Ombudsman Standards of Practice

1. NEUTRALITY AND IMPARTIALITY

- 1.1. The Ombudsman is neutral, impartial, and unaligned.
- 1.2. The Ombudsman strives for impartiality, fairness and objectivity in the treatment of people and the consideration of issues. The Ombudsman advocates for fair and equitably administered processes and does not advocate on behalf of any individual within the organization.
- 1.3. The Ombudsman is a designated neutral reporting to the compliance team and normally operating independent of ordinary line and staff structures.
- 1.4. The Ombudsman should not be aligned with any formal or informal associations within the organization in a way that might create actual or perceived conflicts of interest for the Ombudsman. The Ombudsman should have no personal interest or stake in, and incur no gain or loss from, the outcome of an issue.
- 1.5. The Ombudsman has a responsibility to consider the legitimate concerns and interests of all individuals affected by the matter under consideration.
- 1.6. The Ombudsman helps develop a range of responsible options to resolve problems and facilitate discussion to identify the best options.

2. CONFIDENTIALITY

- 2.1. The Ombudsman holds all communications with those seeking assistance in strict confidence and takes all reasonable steps to safeguard confidentiality, including the following: The Ombudsman does not reveal, and must not be required to reveal, the identity of any individual contacting the Ombudsman Team, nor does the Ombudsman reveal information provided in confidence that could lead to the identification of any individual contacting the Ombudsman Team, without that individual's express permission, given in the course of informal discussions with the Ombudsman; the Ombudsman takes specific action related to an individual's issue only with the individual's express permission and only to the extent permitted, and even then at the sole discretion of the Ombudsman, unless such action can be taken in a way that safeguards the identity of the individual contacting the Ombudsman Team. The



only exception to this privilege of confidentiality is where there appears to be imminent risk of serious harm, and where there is no other reasonable option. Whether this risk exists is a determination to be made by the Ombudsman.

- 2.2. Communications between the Ombudsman and others (made while the Ombudsman is serving in that capacity) are considered privileged. The privilege belongs to the Ombudsman and the Ombudsman Team, rather than to any party to an issue. Others cannot waive this privilege.
- 2.3. The Ombudsman does not testify in any formal process inside the organization and resists testifying in any formal process outside of the organization regarding a visitor's contact with the Ombudsman or confidential information communicated to the Ombudsman, even if given permission or requested to do so. The Ombudsman may, however, provide general, non-confidential information about the Ombudsman Team or the complaint procedures.
- 2.4. If the Ombudsman pursues an issue systemically (e.g., provides feedback on trends, issues, policies and practices) the Ombudsman does so in a way that safeguards the identity of individuals.
- 2.5. The Ombudsman keeps record containing sensitive personal information on behalf of the in a secure location and manner, protected from inspection by others.
- 2.6. The Ombudsman maintains information (e.g., notes, phone messages, appointment calendars) in a secure location and manner, protected from inspection by others, and has a consistent and standard practice for the destruction of such information.
- 2.7. The Ombudsman prepares any data and/or reports in a manner that protects confidentiality.
- 2.8. The Ombudsman shall record statistical information and provide it to the Compliance Leader in a secure anonymized format to help identify trends and provide training when required.
- 2.9. Communications made to the Ombudsman are not notice to the organization. The ombudsman neither acts as agent for, nor accepts notice on behalf of, the organization and shall not serve in a position or role that is designated by the organization as a place to receive notice on behalf of the organization.



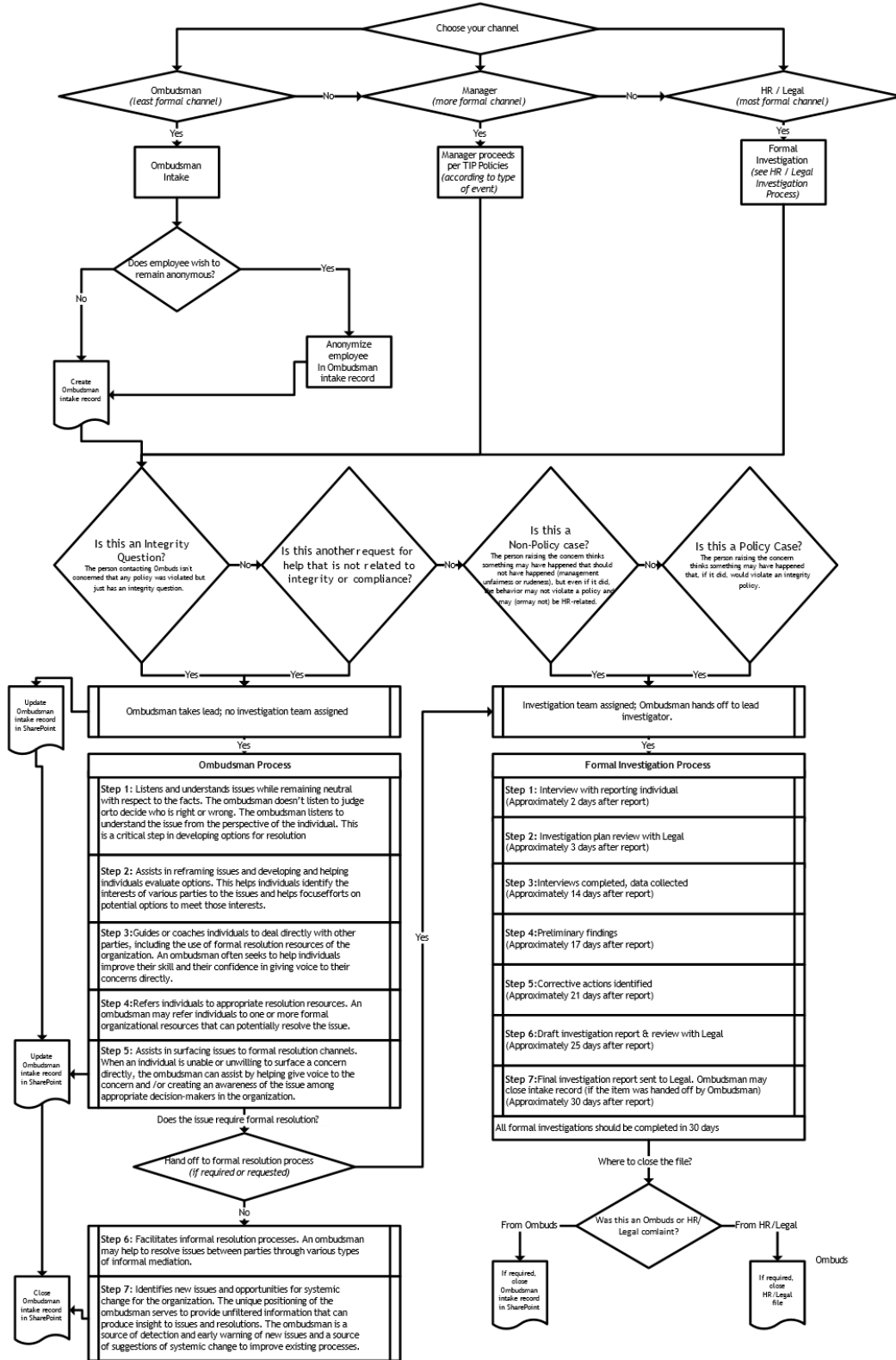
However, the Ombudsman may refer individuals to the appropriate place where formal notice can be made.

3. INFORMALITY AND OTHER STANDARDS

- 3.1. The Ombudsman functions on an informal basis by such means as: listening, providing and receiving information, identifying and reframing issues, developing a range of responsible options, and - with permission and at Ombudsman discretion - engaging in informal third-party intervention. When possible, the Ombudsman helps people develop new ways to solve problems themselves.
- 3.2. The Ombudsman as an informal and off-the-record resource pursues resolution of concerns and looks into procedural irregularities and/or broader systemic problems when appropriate.
- 3.3. The Ombudsman does not make binding decisions, mandate policies, or formally adjudicate issues for the organization.
- 3.4. The Ombudsman supplements, but does not replace, any formal channels. Use of the Ombudsman is voluntary, and is not a required step in any grievance process or organizational policy.
- 3.5. The Ombudsman does not participate in any formal investigative or adjudicative procedures. Formal investigations should be conducted by the Human Resources or Compliance Leader on behalf of the General Counsel. When a formal investigation is requested, the Ombudsman refers individuals to the appropriate offices or individual.
- 3.6. The Ombudsman identifies trends, issues and concerns about policies and procedures, including potential future issues and concerns, without breaching confidentiality or anonymity, and provides recommendations for responsibly addressing them.
- 3.7. The Ombudsman acts in accordance with the law, TIP Code of Conduct, TIP Policies, and this TIP Trailer Services Ombudsman Code of Conduct and Standards of Practice.
- 3.8. The Ombudsman endeavors to be worthy of the trust placed in a TIP Ombuds.



TIP Ombudsman and Investigation Process





TIP Ombuds

Region	Name	Location	Phone	Email
UK	Martyn Henderson	Carrington UK	T: +44 1617 777 222	ESE- UK.Ombudsperson@tipeurope.com
Central	Hartmut Eggers	Rettenburg Germany	T: +49 8327 932 5672 M: +49 1511 181 5093	hartmut.eggerts@tipeurope.com
Eastern Europe	Tomasz Ciszewski	Poznan, Poland	T: +48 6166 598 40 M: +48 6986 838 97	tomasz.ciszewski@tipeurope.com
Med - France	Isabelle Diana	Le Plessis, France	T: +33 1607 685 62	isabelle.diana@tipeurope.com
Med -Italy	Valeria Viggiano	IT Milano Branch	T: +39 (02) 677 356 34 M: +39 3468 445 454	valeria.viggiano@tipeurope.com
Med - Spain	David Becedas Diez		T: +34 (0)918 209 250 M: +34 (0)637 527 465	david.becedas@tipeurope.com
Nordics - Denmark	Brigitte Leeuwen	Padborg, Denmark	T: +45 736 712 02 M: +45 203 163 72	birgitte.van.leeuwen@tipeurope.com
Nordics - Finland	Per Rasmussen	Denmark Taastrup Regional HQ	T: +45 281 056 91	Per.Rasmussen@tipeurope.com
Benelux	Jan Smets	Netherlands Grubbenvorst	T: +31 654 943 406	jan.smets@tipeurope.com
Canada	TBD	TBD	TBD	TBD



LEAD OMBUDS	Henry Kraay	Amsterdam, Netherlands	T: +31 (0)20 504 1638 M: +31 0(6) 5268 8387	henry.kraay@tipeurope.com
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Ombuds Structure

Details

T: +31 (0)20 504 1638

M: +31 0(6) 5268 8387

E: henry.kraay@tipeurope.com

Alternative email:

ese-benelux.ombudsperson@tipeurope.com

Job Description: European Insurance Manager

Henry has built up extensive experience on compliance, integrity, and liability matters over the last years through his functions on Insurance, Sourcing, and through his previous membership of the Dutch Works Council.

Languages: Dutch, English

Lead Ombuds: Henry Kraay



Details

T: +44 1617 777 222

E: martyn.henderson@tipeurope.com

Alternative email:

ese-uk.ombudsperson@tipeurope.com

Job Description: Project Manager (Operations) / Lean Master Black Belt: Leading Simplification Projects for the Operations function in Europe, focusing on process improvement and service innovation in our systems and Customer touchpoints.

Languages: English

UK & Ireland: Martyn Henderson





Details

T: +49 8327 932 5672

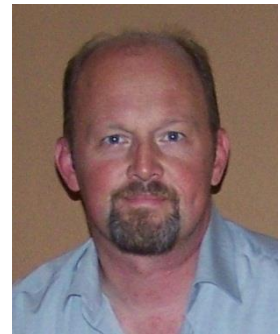
M: +49 1511 181 5093

E: hartmut.eggert@tipeurope.com

Job Description: IT Infrastructure Leader for TIP in Europe:
With TIP since 2005 starting as a IT L1 Supporter, taking over the region Lead and then L2 Support for a few years.

Languages: German, English

**Central Region:
Hartmut Eggert**



Details

T: +48 6166 598 40

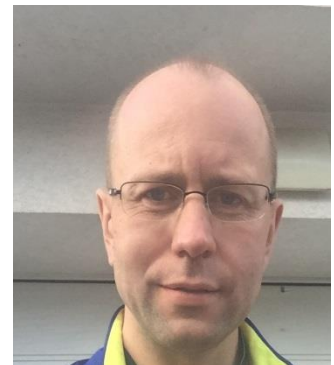
M: +48 6986 838 97

E: tomasz.ciszewski@tipeurope.com

Job Description: Operations Leader for Poland dealing with repairs, maintenance, back-up services to customers, all after sales activities.
Master of Economics.

Languages: Polish, German, English

**Eastern Europe
Region:
Tomasz Ciszewski**



Details

T: +33 1607 685 62

E: isabelle.diana@tipeurope.com

Job Description: Operations Customer support: Receiving calls from customers or colleagues to rent trailers. Allocating units, preparing rates, and managing long term contracts (price increases, renewals year, automatic renewals).

**Med Region
(France):
Isabelle Diana**





Languages: French, English

Details (Left open for Italy)

T:

M:

E:

Job Description:

Languages:

Details

T: +45 2810 5691

E: per.rasmussen@tipeurope.com

Job Description: Nordic Senior EHS & Facility Manager.

Bachelor degree in Electrical & Mechanical Engineering. Worked globally in Oli & Gas with e.g. Compliance and CSR and assigned Ombudsperson 2018 for Finland Region

Languages: Danish, English, German & Scandinavian

Details (Left open for Canada)

T:

M:

E:

Job Description:

Languages:

Nordic Region
(Finland):
Per Rasmussen





Details

T: +34 (0)918 209 250

M: +34 (0)637 527 465

E: david.becedas@tipeurope.com

Job Description: Senior Collector, Risk

Joined TIP Spain in 2009 after 15 years in other multinational companies in roles in credit management. Specialist in computer related to business and degree in credit. Responsible for optimizing the collection process for the customer portfolio, reducing overdue debt and bad debt.

Languages: Spanish, English

**Med Region
(Spain):
David Becedas Diez**



Details

T: +45 736 712 02

M: +45 203 163 72

E: birgitte.van.leeuwen@tipeurope.com

Job Description: Remarketing Manager Nordic

Worked for TIP since 1998 - started as an Ops assistant. In 2000 joined the remarketing team as remarketing assistant - later on become sales executive, and since 2008 remarketing manager for the Nordic Region.

Languages: Danish, Swedish, Norwegian, German, English

**Nordic Region:
Birgitte van
Leeuwen**





Details

T: +31 (77) 382 65 65

M: +31 6549 434 06

E: jan.smets@tipeurope.com

Job Description: Regional Operation Manager

Has more than 30 years' experience in trailer rental in region South East of the Netherlands. This years he has been working for several branches and workshops and is now located at the new location in Grubbenvorst together with people from THT and TIP, responsible for a fleet of more the 4000 units Has been an ombudsman since 2015.

Languages: [Dutch, English, German]

Benelux Region:

Jan Smets





Ombuds Structure (showing languages spoken by Ombuds)

