

OMNIWAY

LOGISTICS EXPERTS FOR RUSSIA & CIS MARKET

POLICY FOR TRANSPORT SUB-CONTRACTORS

OMNIWAY B.V.

**Policy for
Transport Sub-Contractors**

STATEMENT OF REQUIREMENTS

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POLICY FOR TRANSPORT SUB-CONTRACTORS

1. SCOPE

This policy is valid for transport sub-contractors of Omniway B.V. (hereinafter called “OMNIWAY”) according to Quality Management System requirements.

2. GENERAL

Only those Sub-Contractors approved by the Designated Manager will undertake work for OMNIWAY.

OMNIWAY does permit secondary Sub-Contracting. The secondary Sub-Contractors must meet the same standards as primary Sub-Contractors.

The Sub-Contractor must regard any information disclosed by OMNIWAY as confidential, and must not disclose or discuss this information with its customers or suppliers. Sub-Contractors must operate in compliance with all relevant National and International regulations and laws. Operating licenses must be consistent with the activities and operations undertaken.

3. APPROVAL OF SUB-CONTRACTORS

Any potential Sub-Contractor will be requested to provide general information about their company and will be “approved” through assessment of their ongoing performance, or by direct assessment of their quality assurance capabilities.

If the Sub-Contractor is certified to any quality / environmental / safety management standard (i. e. ISO 9001:2008, ISO 14001, ISO 22000, HACCP, OHSAS 18001, etc....) we would ask to send us copies of their actual certificates without request.

With acceptance of any OMNIWAY transport order the Sub-Contractor confirms to fulfill all the requirements of this policy which is available for download on the OMNIWAY website www.omniway.nl.

Should a Sub-Contractor be unable to provide a satisfactory ongoing service, they will be removed from the OMNIWAY Approved List.

4. INSURANCE

Approved Sub-Contractors should hold insurance cover for the following:

- AVC transport conditions Netherlands, as applicable
- Goods In transit, in accordance with: CMR Conditions of Carriage, as applicable

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Sub-Contractors must also undertake to insure any OMNIWAY equipment or equipment of OMNIWAYs' clients for replacement at current market value whilst in their possession. Should any equipment be damaged, or become damaged, damages should be immediately reported to OMNIWAY.

Insurance cover confirmation will be provided by the subcontractor on request.

5. QUALITY

OMNIWAY aims to ensure that the highest quality of service is provided to our customers at all times. Whenever problems occur, OMNIWAY ensures that our customers are informed immediately and that the problems are resolved in a prompt and effective manner.

OMNIWAY expects all of our Sub-Contractors to ensure that personnel are informed immediately of any problems that may arise, in order for us to comply with this requirement. Sub-Contractors must ensure that, any Non Conformances received from OMNIWAY are answered within three working days. A delayed response may result in a further Non Conformance being issued and may ultimately lead to the Sub-Contractor being removed from OMNIWAY Approved List.

6. ENVIRONMENT

OMNIWAY is socially aware as a Company that it has responsibilities to our customers, the general public and to stakeholders to ensure that the environment is safeguarded at all times. As such, we require our Sub-Contractors to support this Policy and report to us any matters causing concern.

7. SAEFTY

OMNIWAY is fully committed to the safety of all. Our Company Health & Safety Policy Statement is available for download on our website. It is important that Sub-Contractors are committed to safety at all times and report to us any matters causing concern.

8. SECURITY

Sub-contractors must ensure that they take adequate steps to ensure the security of goods and equipment during transit and those drivers are aware of and comply with requirements. Sub-contractors involved with hazardous goods must comply with the security requirements for ADR transport regulations.

Any security threat, breach of security or security incidents must be reported immediately to OMNIWAY when they occur.

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9. DRIVERS

It is the Policy of OMNIWAY to use the highest standard of driver, having regard to personal qualities as well as driving ability. IMNEX expects all drivers to present themselves for work in a clean and tidy condition, and to behave in a proper, responsible and safe manner whilst undertaking OMNIWAY business.

Drivers utilized by the Sub-Contractor must hold an appropriate Driving License, current ADR Training Certificate (when transporting hazardous chemicals) and must be GDP (Good Distribution Practice) – trained. For temperature controlled transport of fruit, vegetables, food and pharma goods is Sub-Contractor required to have a ATP- / FRC certification for their equipment and HACCP certification for storage and handling.

The driver must be fully compliant with ADR / HACCP / GDP Regulations (if applicable) and appropriately trained for the job required. Drivers must undergo regular refresher training and records must be retained. Records of driver training must be retained on file by the Sub-Contractor and be available for verification by a OMNIWAY representative upon request.

It is expected that processes will be in place to monitor working / driving hour's compliance and that records will be retained of driver convictions and any disciplinary actions taken.

Drivers are NOT permitted to drink any alcohol or use illegal drugs when on duty. Drivers will not be allowed to work for OMNIWAY if found to be in possession of, or under the influence of, any illegal substances.

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All Drivers shall always wear the seat belt and must not use their mobile phone or any other 2-way communication device whilst driving.

The driver is committed to wear work clothes and protective equipment in any case of a loading or unloading event. In the case of an unloading event within a public area the driver is committed to ensure a safe working place. The driver has to install warning signs at the back of vehicle.

In the event of continual driver related problems, OMNIWAY reserves the right to prohibit drivers working on our behalf.

After entering the plant the driver has to comply with the factory/plant regulations and instructions.

10. VEHICLE PARKING / DRIVER CONTROLL

Where drivers need to park away from his normal depot, careful consideration should be given to the place in which he parks the vehicle when he proposes to leave it unattended. The vehicle should be parked in accordance with ADR Regulations (if applicable) regarding supervision, parking and security of vehicles.

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11. PERSONAL PROTECTIVE EQUIPMENT (PPE)

The Sub-Contractor must supply safety equipment (PPE) for use by its drivers. As a minimum requirement, all drivers must be provided with:

- Hard Hat (if applicable)
- Goggles
- PVC Gloves
- Industrial Overalls (if applicable)
- Safety Boots
- Hi-Visibility Vest / Jacket
- Eye Wash Bottle
- First Aid Kit

Drivers transporting chemical products should also be provided, as a minimum requirement, with:

- PVC suit
- Respirator with filter elements suitable for the products handled.

Additional specialist equipment should be provided to the driver, when required, as defined on the Tremcard for the product being carried.

All PPE must always be in good condition and – if applicable – within the expiry date.

Therefore it must be checked in regular intervals. Drivers must regularly be trained in use of PPE. The driver must ensure that when loading and discharging product, or when situations arise where they may come into contact with product, all appropriate PPE must be worn.

Specific Site Regulations must also be observed.

12. VEHICLES AND EQUIPMENT

All vehicles, tank/gas containers/road barrels/Tilt & Taut trailers/Thermo trailers (where provided) and associated equipment must be clean, well maintained and fit for the purpose employed. Transport equipment must be selected in accordance with any relevant vehicle construction standards. Records of services and maintenance checks should be retained and made available if required. All trucks should be equipped with seat belts. All temperature controlled equipment must be ATP (Accord Transport Perissables) class FRC / FRB / FRA certificated.

14. OPERATIONAL COMMUNICATIONS

Drivers will be given specific instructions on the work they are asked to undertake. As they will be acting on behalf of OMNIWAY, they will be the point of contact with the customer.

Therefore ALL instructions given must be fully adhered to at all times. Should this not be possible, or should any details not be clear OMNIWAY must be informed.

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Where specific delivery/loading times are given, Sub-Contractors must ensure that these times are strictly adhered to. Any delays to schedules must be relayed to OMNIWAY immediately.

The Sub-Contractor will remain responsible for the consignment until the Customer accepts it, and obtain a signature on the delivery document as proof of delivery.

During loading / discharge, all local site rules are to be strictly adhered to. Should the driver believe this not to be possible he must refer back to the OMNIWAY office before proceeding. Drivers must also report any changes at loading/delivery points that differ from the instructions they were given.

All deviations must be recorded on the proof of delivery documentation.

Certain products carried by OMNIWAY are temperature and pressure sensitive. When undertaking the movement of such products the temperature and pressure must be recorded and reported as directed by OMNIWAY.

When demurrages occur, OMNIWAY must be informed verbally immediately by the driver or his operator. This must be followed up in writing within 1 working day. Confirmation of these costs will only be accepted if the waiting times are clearly documented on the proof of delivery documentation, identifying the reason for the delay and a signature from the customer. A copy of such documentation is to be made available to OMNIWAY to support these charges. Extra costs advised outside these times will not be accepted.

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15. EMERGENCY / INCIDENT REPORTING

Any Emergency incidents should be reported by telephone to the relevant OMNIWAY Office as soon as possible. OMNIWAY supplies a 24 h emergency phone number with full support to any emergency incidents - +31 (0)6-40971728. Note: In order to reduce the extent of damage or loss of the product carried, OMNIWAY emergency response team must be contacted for advice and support.

A full report must be completed upon the driver's return to depot and a copy given to OMNIWAY.

Any breakdown / accident occurring should be reported by telephone to OMNIWAY as soon as possible. The Sub-Contractor may be required to submit a written report at OMNIWAYs' request.

All unsafe loading / unloading practices must be reported to the OMNIWAY Office immediately

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16. LABELING

Drivers must ensure that goods being transported is correctly labelled in accordance with current legislation. If the labels not comply with legislation OMNIWAY must be informed immediately. The driver should then await further instructions.

Under NO circumstances must the driver proceed with his journey with an incorrectly labeled container/road barrel / trailer.

17. DOCUMENTATION

ADR Tremcards (if applicable)

All drivers must be in possession of written hazard details for their loads. This is normally in the format of a Tremcard or alternative detailed information.

The Tremcard / written information must be kept in the vehicle and be available, if required, at all times whilst that product is being carried.

Documentation for Russia / Ukraine and other CIS countries

Goods shipments intended for Russia / Ukraine or CIS countries, must be accompanied by the following documents (in the English or Russian language):

- Original Commercial Invoice (in five-fold)
- Original Packing List
- Export document
- Certificates (if applicable)

Proof of Delivery / CMR

Documents must be fully detailed with the correct information. Sub-Contractors are required to attach copies of the signed POD/CMR to the OMNIWAY invoice. Failure to comply may lead to non-payment of the invoice.

If the customer cannot take the entire product or the acknowledgement details differ from the original details provided then OMNIWAY must be informed before the driver leaves the customer's premises.

Container Damage Reports

When containers are collected by the driver from terminals, depots, quayside etc. the driver must undertake a full inspection (Interchange) of the container they are collecting. If the driver noted that the container has sustained damage he must advise the terminal/depot personnel and obtain a signed damage Report. Upon obtaining this signed report the driver

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must report the damage to his supervisor and await further advice. The Supervisor must contact the OMNIWAY office accordingly.

Failure to provide confirmed damage reports failure to notify OMNIWAY of damaged equipment will result in the sub-contractor being liable for any associated repair costs incurred.

Work Instructions

When Sub-Contractors are requested to undertake work on behalf of OMNIWAY they will receive their instructions in writing, normally in the form of a fax or e-mail. This will detail instructions that the driver should follow whilst undertaking the work.

Our customers quite rightly demand the highest standards and service levels from Omniway B.V.. These exacting standards also apply to anyone representing our company. That's why we take every possible precaution to ensure we employ only best subcontract hauliers and suppliers.

Mr. Pavel Mikhalevitch
Chief Executive Officer
Omniway B.V.



Date: 01-08-2014

Place: Bommel, The Netherlands