

HPT – Declaration for Subcontractors

August 2026

1. Scope of Application

This declaration applies to all hauliers, carriers, and subcontractors who, in whole or in part, perform transport or related services for H. P. Therkelsen A/S ("HPT").

By signing this declaration, the subcontractor acknowledges and undertakes to comply with its provisions and to ensure that equivalent requirements are passed on to any of its own subcontractors.

2. Compliance with Legislation

The subcontractor declares that it will always comply with all relevant and applicable laws and regulations, including but not limited to:

- Transport and road traffic legislation
- Occupational health and safety legislation
- Regulations concerning wages, taxes, and social contributions
- Regulations concerning residence and work permits
- EU regulations on driving and rest periods

3. Human Rights

The subcontractor shall not, directly or indirectly:

- Use forced labour or debt bondage
- Participate in human trafficking
- Require fees, deposits, or other payments as a condition of employment
- Retain passports, identity documents, or other personal documents

Employees must always be free to terminate their employment in accordance with applicable legislation.

4. Child Labour

Under no circumstances may the subcontractor employ illegal child labour.

1. The general minimum age for regular employment is 15 years, unless national legislation establishes a higher minimum age.
2. Lawful work performed by children or young people under the age of 15, as part of part-time employment, light work, or vocational introduction programmes, may be accepted where expressly permitted by applicable national legislation.
3. Such work must not interfere with the young person's education, health, safety, or physical, mental, or social development.
4. Young people under the age of 18 may not perform:
 - Night work
 - Hazardous work
 - Work that may harm their health, safety, or development
5. The subcontractor shall ensure that the working hours and duties of young employees always comply with applicable national legislation.

5. Employment Conditions and Remuneration

The subcontractor undertakes to ensure the following conditions for all employees, including drivers:

- Written employment contracts prepared in a language understood by the employee
- Clear specification of job function, salary, working hours, and other terms and conditions
- Remuneration at least equivalent to the applicable minimum wage and/or collective bargaining agreement provisions
- Timely payment of wages through bank transfer
- Clear, transparent, and comprehensive payslips

Unreasonable, non-transparent, or unlawful wage deductions shall not be made.

6. Working Time, Driving Time and Rest Periods

The subcontractor shall ensure full compliance with:

- Regulation (EC) No 561/2006 of the European Parliament and of the Council
- Applicable national regulations concerning driving and rest periods

In particular:

- The regular weekly rest period of 45 hours must not be taken in the vehicle cabin were prohibited by law
- Drivers must have access to proper, dignified, and lawful accommodation and rest facilities
- Costs relating to mandatory accommodation shall not be deducted from wages

7. Health and Safety

The subcontractor shall ensure a safe and healthy working environment and undertakes to:

- Provide roadworthy and legally compliant vehicles
- Ensure necessary training, instruction, and guidance
- Provide personal protective equipment free of charge where required
- Work systematically to prevent accidents and occupational injuries

8. Accommodation

Where the subcontractor provides accommodation for employees, such accommodation should be as a minimum:

- Be safe, clean, and fit for purpose
- Provide access to toilet facilities, bathing facilities, heating, and drinking water
- Not result in unreasonable, hidden, or unlawful wage deductions

9. Data Protection and Confidentiality

The subcontractor undertakes:

- Protect personal data relating to employees and drivers
- Handle customer data and business information confidentially
- Comply with applicable data protection legislation, including Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)

10. Whistleblowing and Reporting

The subcontractor shall ensure that employees are able, in good faith, to report serious concerns or misconduct without risk of retaliation or adverse consequences.

The subcontractor accepts that such matters may alternatively be reported directly to HPT.

11. Sanctions, Trade Compliance and Business Ethics

The subcontractor declares:

- That it is not subject to international sanctions, terrorist, or watch lists
- That it complies with applicable trade and sanctions regulations
- That it does not engage in corruption, bribery, fraud, or conflicts of interest

12. Competence and Training

The subcontractor shall ensure that drivers:

- Possess the necessary qualifications, certificates, and driving licences
- Have been instructed regarding:
 - Driving and rest time regulations
 - Health and safety requirements
 - The requirements are set out in this declaration

13. Continuous Improvement

The subcontractor undertakes, in dialogue with HPT, to continuously work towards improvements in:

- Working conditions
- Safety
- Responsible and sustainable transport

14. Force Majeure and Proportionality

If compliance with individual requirements of this declaration is temporarily prevented due to circumstances beyond the subcontractor's control, including but not limited to lack of infrastructure, emergency situations, or force majeure events, such circumstances shall:

- Be documented
- Be communicated to HPT without undue delay

15. Monitoring and Consequences

HPT is entitled to:

- Request relevant documentation
- Conduct inspections and audits
- Have inspections performed by a third party

Material or repeated breaches of this declaration may result in termination of the cooperation without liability on the part of HPT.

16. Signature

This declaration constitutes a prerequisite for cooperation with HPT.

Company: _____

Company Registration No. / Address: _____

Place and Date: _____

Signature: _____

Name and Title: _____