



# CODE OF CONDUCT

Guide to Behavior  
with Integrity



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## Putting Integrity Into Action

### MESSAGE FROM OUR CEO

At our Company, our people care deeply about doing the right thing every day. Together, we can succeed in providing value to our clients and shareholders as well as better opportunities for our employees, suppliers, and customers. Our shared commitment to operating with the highest ethical standards and making a positive difference in what we do is what makes our Company special. In today's environment, we go beyond mere service delivery; we innovate with integrity by using our understanding of technology and its impact on people to develop inclusive, responsible, and sustainable solutions to complex business and social challenges. To get this right, we must empower our people to make good decisions, act responsibly, and speak up with confidence.



With our Code of Conduct, we hope to help our employees make ethical behavior and decision-making a natural part of what we do every day with our clients, our business partners, and within our communities. Our Code is more than just a document, it's what we believe, how we conduct our business, how we live, and how we lead. It's fundamental to how we compete, how we improve our business performance, and how we build on the Company's reputation in the marketplace.



## OUR BELIEFS

Our Company is a values-based, ethically led organization. Our beliefs are the values that guide the conduct of our business, our decisions and our leadership.

## MAKING GOOD DECISIONS

Not every issue that comes up has a clear path to resolution. Difficult situations may require judgment and involve soliciting input from others to help make better, more balanced decisions.

When faced with making any decision, you should ask yourself the following questions:

- Is it consistent with our beliefs?
- Would I want others to know about it?
- Could it be against the law?
- Could it violate our core values, Code of Conduct or policies?
- Could it breach an obligation to a customer or other business partner (for example, contracts or customer codes of conduct or policies)?
- Could it cause harm to any person, our individual reputations or The Company's brand, reputation, financial performance or business relationships?
- Is it fair?

## RAISING CONCERNS AND SPEAKING UP

Often we hear stories of other companies where employees were aware of problems, but did not feel comfortable coming forward. No one should ever feel that way at our Company. If any employee experiences or witnesses disrespectful, inappropriate, fraudulent, unethical or illegal behavior, including concerns about retaliation, they are to speak up and report such behavior immediately, either to their supervisors or directly to Human Resources.

What happens when an Ethics Concern is raised?

The Company takes all reported concerns seriously. The Company confidentially investigates ethics allegations to determine if any law, policy or the Code of Conduct has been violated. The Company has a compelling interest in protecting the integrity of every investigation, including protecting



reporters and witnesses from harassment, intimidation and retaliation; keeping evidence from being destroyed; ensuring testimony is honest and identifying and addressing root causes. The Company does not generally disclose investigation details, but may do so on an exception basis.

## WHO MUST COMPLY

Our Code of Conduct applies to all Company employees and contractors—directors, officers and employees in every country—and every Company entity. In addition, third parties, such as carriers, brokers and suppliers, are required to comply with the Code of Conduct when acting on the Company's behalf.

--Your responsibilities--

**Act ethically and comply with the law, the Code of Conduct  
and Company policies**

We each have a personal responsibility to act ethically and comply with the law, the Code of Conduct and Company policies and procedures at all times. Violations break trust with the Company and our clients and may result in individual disciplinary action, up to and including termination of employment, and perhaps legal liability. In some cases, the Company may have a legal or other obligation to report the results of an investigation to the appropriate law enforcement authorities, or may otherwise choose to do so. The Company's core values and ethics are global and consistent. We recognize that some business cultures have practices that may violate our core values and ethics, such that upholding them may be uncomfortable, even challenging. Doing the right thing often requires courage. Saying no to these practices does not mean we disrespect those cultures.

## Understand and follow customer codes of conduct where applicable

It's also our responsibility to understand a client's code of conduct in addition to following our own Code of Conduct. There may be restrictions on, for example, gifts, entertainment and physical security that are more limiting than our own, and if so, we follow them in connection with the customer engagement.



# OUR BEHAVIOR

Your guide to Behavior  
with Integrity



## Leading With Integrity

### In the workplace

#### Alcohol & Drug Free Workplace

The Company is committed to a safe and healthy workplace for everyone. The possession, solicitation or use of illegal drugs, or being under the influence of such drugs while at work, is prohibited and will not be tolerated. The Company strictly forbids improper use of drugs and alcohol. All employees should ensure their performance and judgment are unimpaired by alcohol consumption during work hours. Employees should not report to work under the influence of alcohol nor should they consume alcohol on company property. In some instances, associates of the legal drinking age may consume alcoholic beverages at company-sponsored events if the consumption of alcohol is approved in advance by the CEO or the CFO for the business unit sponsoring the event. The Company will take customary practices into consideration in countries where a moderate consumption of alcohol with a business meal is common.

#### Discrimination & Harassment Prevention

One of the basic beliefs upon which our company was founded is "respect for the individual." Each of us is responsible for creating a culture of trust and respect that promotes a positive work environment. This means treating one another with fairness and courtesy in all of our interactions in the workplace. We are committed to maintaining a diverse workforce and an inclusive work environment. The Company prohibits discrimination in employment, employment-related decisions or in business dealings on the basis of an individual's race, color, ancestry, age, gender identity or expression, sexual orientation, religion, disability, ethnicity, national origin, citizenship status, political belief, veteran status, marital or family status, trade union membership, pregnancy, maternity or any other status protected by law or local policy. We should provide an environment free of discrimination to our employees, customers, suppliers and business partners.

We believe in treating each other with respect, whether it's a co-worker, supplier, customer or anyone doing business with us or on our behalf.



Harassment is conduct which inappropriately or unreasonably interferes with work performance, diminishes the dignity of a person or creates an intimidating, hostile or otherwise offensive work environment based on an individual's legally protected status. Verbal, visual or physical conduct of a sexual nature is not acceptable in the workplace and may be determined to be sexual harassment. Examples include:

- Sexual advances, requests for sexual favors, sexually explicit language, off-color jokes, remarks about a person's body or sexual activities
- Displaying sexually suggestive pictures or objects, suggestive looks, leering or suggestive communication in any form
- Inappropriate touching, both welcome and unwelcome
- When a person in a position of power makes unwanted sexual advances or implies that employment decisions may be affected by acceptance or rejection of sexual advances
- Repeated unwanted attention, such as phone calls, texts or messages to an individual without a work-related reason for the contact.



The Company also prohibits other forms of harassment based on an individual's legally protected status, such as:

- Using slurs or negative stereotyping
- Verbal kidding, teasing or joking
- Intimidating acts, such as bullying or threatening
- Any other conduct that shows hostility toward, disrespect for or mistreatment of an individual based on the individual's legally protected status.

Harassing conduct in the workplace, such as that described above, is prohibited regardless of whether it is welcome or unwelcome and regardless of whether the individuals



involved are of the same or different sex, sexual orientation, race or other status. The Company prohibits retaliation and will not terminate, demote or otherwise discriminate against employees for reporting concerns related to the Company's Code of Conduct.

The Company expects all employees, regardless of career level or role, to treat each other, and others we interact with in work-related situations—whether in person or online—with respect and professional courtesy. This includes customer and supplier personnel, advisors to our customers and other service providers such as hotel, restaurant and airline staff.

## Inappropriate Conduct

We believe in maintaining a work environment free of inappropriate conduct such as obscene, profane, gross, violent, discriminatory, bullying or similarly offensive language, gestures or conduct. The Company will not tolerate such conduct, which violates our belief of respect for the individual. While posting information online can be a great way to connect with others, always conduct yourself online in a manner that is consistent with the Company's Code of Conduct. Inappropriate conduct of the type described here is strictly prohibited, even if it occurs online.

Disrespectful behavior and harassment take many forms. They consist of behaviors that interfere with work performance, or any other treatment of a person that creates an intimidating, hostile or offensive work environment.

Disrespectful behavior and harassment can occur in many contexts including but not limited to:

- Something someone says or does (or does not say or do), whether in person or remotely
- An email, letter or document
- A posting on the internet or intranet (for example, on Facebook or Twitter or on a blog)
- A message sent by instant messenger applications (for example, on Skype, Slack or WhatsApp)
- A physical gesture.

Examples of disrespectful behavior or harassment include, but are not limited to:

- Repeated shouting at employees in public or private or excessive use of profanity/swearing directed towards an individual and/or an individual's work product



- Targeted vulgarity and rudeness, personal insults or name-calling or public or private humiliation and/or intimidation
- Uncontrollable and threatening anger directed towards an individual
- Repeated, blatant disregard by an individual for another person's personal time
- Spreading rumors with a deliberate intention to cause harm to an individual, or persistent, unjustified and/or unnecessary negative attacks on a person's personal or professional life
- Deliberate and blatant disrespect to cultural differences
- Deliberate exclusion or continued isolation from work social activities
- Displays of offensive material or offensive jokes
- Unwanted physical contact
- Abuse of authority (including use of intimidation, threats, blackmail, coercion, or requiring an individual to perform purely personal errands or tasks)
- Threats of dismissal, loss of promotion, depriving someone of work opportunities or other negative consequences
- Bullying, "mobbing" or abusive behavior (in each case, by one or more individuals); "bullying" means behavior, directed against someone, that is intimidating, offensive or malicious and that undermines the confidence and self-esteem of that person
- Threatened or actual violence whether or not directed at an individual.

#### **We ensure a workplace free of disrespectful behavior or harassment**

Harassment on the basis of a person's characteristics—known as protected characteristics—is illegal in many jurisdictions. Disrespectful behavior is also potentially illegal or legally actionable in many jurisdictions. The Company's ethical values go beyond what the law requires. We want a workplace that is free from any form of disrespectful behavior or harassment, whether it is covered by local law or not.

#### **We expect more from our leaders**

Our Company leaders play an important role in setting the tone from the top and ensuring we maintain a respectful, ethical and fair work environment. The Company encourages leaders to set an example in work/life balance and all employees to be respectful of others' work/life balance needs. The Company leaders also have a responsibility to always take action if they witness, or become aware of, inappropriate or disrespectful behavior, or retaliation and to encourage their teams to do the same.



## Wage & Hour

We are committed to complying fully with all applicable laws and regulations dealing with wage and hour issues, including off-the-clock work, rest breaks, meal periods and days of rest, overtime pay, termination pay, minimum-wage requirements, wages and hours of minors and other subjects related to wage and hour practices. Company employees must:

- Comply fully with all corporate policies and procedures related to wage and hour issues
- Comply fully with all applicable laws and regulations pertaining to wage and hour issues
- Report any violations of wage and hour laws or policies through the open-door communication process or by contacting Human Resources.

It is a violation of law and Company policy for you to work without compensation or for a supervisor (hourly or salaried) to request you work without compensation. You should never perform any work for the Company without compensation.

## Conflict of Interest

### General

All employees have a responsibility to all our stakeholders to make decisions strictly on the basis of the Company's interests, without regard to personal gain. A conflict of interest can arise when our judgment could be influenced, or might appear as being influenced, by the possibility of personal benefit. Even if it's not intentional, the appearance of a conflict may be just as damaging to an employee's reputation, and the Company's reputation, as an actual conflict. All employees should always be on the lookout for situations that may create a conflict of interest and do everything possible to avoid them.

It's every employee's responsibility to tell their manager about any situation they think creates, or could create, a conflict of interest. Managers are encouraged to bring such matters to the attention of Human Resources for advice. Employees also may contact Human Resources with any questions they may have.

Conflict of interest situations can come up in various ways. The following sections outline some of the possibilities.

### 1.1. Financial Investments

Employees have a responsibility to make sure their personal financial activities outside of the Company do not conflict with their responsibilities to the Company. A financial conflict of interest can arise when their judgment could be influenced, or might appear as being influenced, by the possibility of personal financial gain.



Examples of conflicting financial investments are:

- Financial interest in a supplier to the Company, if the employee has direct or indirect involvement in Company business with that supplier
- Receiving personal compensation from a supplier, if the employee has direct or indirect involvement in Company business with that supplier
- Using confidential company information for personal gain.

## 1.2. Outside Employment

Employees should avoid employment or outside interests that may create, or give the appearance of creating, a conflict of interest. For example, management employees working for a competitor is deemed to be a conflict. Employees should check with their managers before accepting employment with a competitor to determine if a conflict exists. Factors for consideration include similarity of position and job responsibilities. Similarly, employees may not work for a supplier if they have any influence (either direct or indirect) over the supplier's product or the supplier's business with the Company.

Employees may operate and work in a side business as long as it does not create a conflict of interest with their work at the Company. This means the side business cannot interfere with an employee's responsibilities as a Company employee, be similar in nature to the employee's role as an employee, benefit from the use of Company assets, supply products to the Company or reflect negatively on the Company.

Any questions about whether outside employment creates a potential conflict, should be addressed to an employee's manager or Human Resources.

## 1.3. Personal Relationships with Customers and Suppliers

Employees should not have social or other relationships with customers and suppliers if the relationship would give the perception an improper business influence is being exerted. We believe in basing our relationships with customers and suppliers on efficient, fair and lawful business practices. The selection of customers and suppliers must be made on the basis of objective criteria, including integrity, quality, service, price, delivery, adherence to schedules, maintenance of adequate sources of supply and the Company's purchasing practices and procedures. The Company must treat its customers and suppliers with respect, fairness and honesty. The Company must not take undue advantage of customer or a supplier by using the Company's business influence. Also, the Company should expect its customers and suppliers to follow all applicable legal requirements in their business practices, as well as, for our suppliers, our supplier standards.



If an employee believes they may be perceived as having an inappropriately close relationship with a customer or supplier, or appear to be exerting a business influence on the customer or supplier, they should inform their manager or contact Human Resources.

#### 1.4. Gifts & Entertainment

Accepting gifts and entertainment can cause a conflict, or the appearance of a conflict, between personal interests and professional responsibility. The Company's culture is to never accept gifts or entertainment from any customer or supplier, potential customer or supplier, government agent or other third party the associate has reason to believe may be seeking to influence business decisions or transactions. Employees also may not accept a gift or gratuity from a customer or supplier for work performed by the associate in a Company facility, except as required by local or national policy.

We may not accept items donated to the Company by customers or suppliers for the purpose of raising funds for charities or non-profit organizations. Also, we should never ask for, accept or approve of customers or suppliers making donations on behalf of the Company. Additionally, associates should not provide a list of our customers or suppliers to charitable organizations for the purpose of fundraising.

The Company's policy on gifts and entertainment stems from its values of complete transparency and objectivity. Since such gifts and entertainment increase the cost of doing business, we help our customers and suppliers maintain low costs by not expecting the gifts and entertainment they may have to spend on other customers or suppliers. As a global player, the Company recognizes that it may encounter situations in which local practices will come into play. Human Resources will review these situations on a case-by-case basis.

When establishing a new business relationship, employees are encouraged to make sure all parties are aware of the Company's policy regarding gifts and entertainment. In some countries where gift giving is a custom or tradition, employees should politely explain this policy, especially prior to holiday gift-giving periods, to establish expectations.

Employees always should be aware of how the act of accepting a gift or gratuity might be perceived by the public, by other customers or suppliers or by other employees. When dealing with external businesses, employees should ask themselves, "Would this business offer me this gift or gratuity if I wasn't employed by the Company?" If the answer is "no" or is unclear, the employee should not accept it. Occasionally, there may be times when returning a gift would be impractical or embarrassing. In those rare instances, the gift should be managed in a fair and objective manner that does not benefit an employee personally, such as donating it to charity. Employees should immediately tell their managers or Human Resources



about any gift they've been offered or received if you feel that gift might be a violation of our policy. If any employee has any questions about gifts and entertainment, they should seek assistance from their manager or Human Resources.

Many companies and governments have policies about what their employees may accept, and sometimes our contracts with clients or other parties specifically limit or forbid the Company's employees from providing gifts, meals, entertainment or travel to their employees. Because of this, review and confirm that the recipient's policies and contracts with the Company allow us to give a gift, meal, entertainment or travel before offering it.



### 1.5. Personal Relationships with Other Associates

The Company wants to maintain a work environment in which employees can perform effectively and achieve their full potential. All employees are responsible for creating a climate of trust and respect and for promoting a productive work environment. A conflict of interest exists when an individual manages someone with whom they have a family, romantic or dating relationship. A family relationship includes the following relatives by birth, adoption, marriage, domestic partnership or civil union: your spouse, children, parents, siblings, grandparents or grandchildren, as well as anyone who currently is a member of the employee's household, whether or not they are related. It also may include other close personal relationships such as godparents. Even if acting properly, an employee's relationship will likely be seen as influencing their judgment. This can damage morale and disrupt workplace productivity. Therefore, employees may not directly or indirectly supervise any family members or any employee with whom they have a close personal relationship, date or are romantically involved. This includes situations in which they may be able to influence that employee's terms and conditions of employment or that



employee may be able to influence the terms and conditions of the employee's employment. The Company strives to eliminate personal relationships that interfere with work performance or which may constitute harassment. Employees should ask for guidance from their manager or contact Human Resources whenever an issue comes up regarding a personal relationship.

### 1.6. Company Assets

All Company employees have a responsibility to our shareholders to use Company property and assets for Company business and not allow them to be used for any type of personal gain. All employees are responsible for maintaining Company property under their control and should take reasonable steps to protect it from theft, misuse, loss, damage or sabotage. Where permitted by law, employees have no expectation of privacy as to the use of Company communication tools (such as email or voice mail). The Company has the right to and does monitor communications tools, including the content and usage of such tools.

## In the marketplace

### Competitors and Fair Trade Practices

The Company is committed to complying with all competition, fair dealing and antitrust laws applicable to its businesses. These laws help protect competition to enable open markets and enhance productivity, innovation and value for customers. The Company's policies and actions demonstrate its interest to encourage competition by complying with all applicable competition and antitrust laws, as well as engaging in truthful and accurate sales and marketing practices. In doing so, the Company will thrive and continue to help its customers save money and meet their logistics objectives. For specific information on applicable laws or to seek advice, contact Human Resources.

The Company does not collaborate with competitors on how to price its services or whether to pursue opportunities. The Company is a relentless but fair competitor. The Company only pursues and wins business on its own merits. The Company does not engage in conduct that gives even the appearance of unfair competition. The Company does not collaborate or agree with a competitor about pricing of services or offerings, or timing of planned price increases or target margin changes. These practices are commonly called bid rigging or price fixing and violate competition laws. The Company does not divide opportunities, markets, offerings or geographic regions. These practices are commonly called market



allocation agreements, and they also violate competition laws. If approached by a competitor about anything prohibited, all employees should make it clear that the Company is not agreeing to anything and does not want their confidential information. Employees should end contact with that person immediately and contact their supervisor or Human Resources as soon as possible.

## Intentional Dishonesty

Striving for excellence means operating the Company's business with high integrity and never conducting or participating in deceptive, dishonest or fraudulent activities. These activities are not only unethical, but may also be a violation of law. Employees should manage their particular area of business with as much transparency as possible. Employees should also encourage a work environment that supports the contributions of all employees and is based on the Company's ethical values. Acts of fraud or dishonesty are more likely to occur in environments with insufficient controls or unrealistic expectations. To maintain excellence in the Company's operations, all employees should encourage transparency, honesty and realistic expectations.



## Insider Trading

It is illegal to buy or sell stock or other securities on the basis of material, non-public information or inside information. Inside information is any material, non-public information a reasonable investor is likely to consider important when making an investment decision. Some common examples include periodic sales or earnings information for the Company, prior to the public release of such information, projections of future earnings or loss or news of a significant event such as a pending merger, a change in operations structure or a change in executive management.



It also is illegal to communicate or tip inside information to others so they can buy or sell stock or other securities on the basis of such information. If any employee is aware of inside information about the Company or any other company, including our customers, suppliers or business partners, they are prohibited from trading directly or indirectly or tipping others to trade in stock or other securities of that company. These same restrictions apply to any person living in their household or who is financially dependent upon the employee, as well as to any entity or securities account the employee may control. As Company employees, employees all must remember to:

- Never buy or sell stock or other securities of any company while in possession of inside information about that company.
- Never recommend anyone buy or sell stock or other securities of any company while in possession of inside information about that company.
- Never disclose inside information about the Company to anyone outside of the Company (including your family members), unless such information has been released to the general public or unless such disclosure has been approved by either the CEO or the CFO and only after the CEO or the CFO has informed you that adequate steps have been taken to prevent misuse of the information.

## In the community

### Anti-Corruption

The Company believes in fair, free and open markets. It also believes in promoting good government. The Company does not tolerate bribery, corruption or unethical practices of any kind.

The Company strictly prohibits anyone acting on behalf of the Company, whether directly or indirectly, from making or receiving bribes or improper payments. The Company's Code of Conduct forbids any employees from paying, offering or authorizing payment of money (or anything that has value) to improperly influence anyone. This also applies to payments made through someone unaffiliated with the Company, such as a third party acting on the Company's behalf. This prohibition also covers small or minor benefits to influence someone improperly. This stance on improper benefits is firm — regardless of local practice or custom, or even harm to the Company's business.

All Company employees must avoid any interaction with a public official, employee of a publicly owned company or political organization that could even appear improper. This includes any person who exercises a public function or who works for a government at any level (e.g., customs clearance officer, members of the military and law enforcement), a political



party or campaign (including unpaid staff), a public international organization (e.g., the World Bank) or a government-owned or government-controlled enterprise (e.g., employees at state-owned utilities, energy companies, hospitals). A contract with a state-owned or public entity requires prior written Legal Counsel approval.

Employees must immediately report any suspected violations or any requests for a bribe. For further guidance on this topic, contact Human Resources.

### Anti-Money Laundering

The Company does not engage in any money laundering or terrorist financing activities or assist any other party in doing so. Employees escalate any red flags that are identified for further investigation and report suspicious activity to the government where required.

The Company has zero tolerance for financial crime. This includes money laundering and terrorist financing. The Company's most effective tool for detecting red flags is its employees.

The Company is committed to complying fully with all applicable money-laundering laws throughout the world. Some countries also have laws related to the reporting of cash or other suspicious transactions that must be obeyed.

Employees must be alert to the following activities:

- Types of payments associated with money laundering, such as: multiple money orders, volume purchases of prepaid products such as gift cards or large cash transactions
- A customer, supplier or other third party who is reluctant to provide complete information, provides false or suspicious information or is anxious to avoid reporting or recordkeeping requirements
- Unusual domestic or foreign fund transfers that indicate scam activities or fraudulent schemes
- Structuring a transaction to avoid requirements, such as conducting multiple transactions below the reportable threshold amounts the Company has established rules concerning acceptable forms of payment. For further guidance on this topic, please contact the Finance Department

### Authority to Work

The Company strives to be a good corporate citizen. Therefore, employees will not hire, recruit or refer for a fee, anyone not legally authorized to work in the country in which employment is sought. It is the



Company's responsibility to inspect, verify and document the identity and employment authorization of every new employee, including employees on global assignment in a country different from their home country. The Company is also responsible for re-verifying the continuing employment eligibility of each employee by requesting further documentation when the initial work authorization has expired. All persons hired or sent on a global assignment to a country other than their home country, must provide proper documentation and verification of their authorization to work in the country where they are to be employed. In complying with immigration laws, it is important that the Company follow its policy against employment discrimination on the basis of national origin or possible citizenship status. The Company requires all employment agencies, contractors and others doing business with the Company to fully comply with all immigration laws.

## Environmental Responsibility

### Health & Safety

The Company serves as a responsible steward of the environment and care for the safety and well-being of its employees, customers, suppliers and communities. The Company is committed to conducting business in a socially responsible and ethical manner that protects the environment. It is committed to environmental protection and preservation of our natural resources. The Company is also responsible for complying with all applicable environmental laws and regulations. This responsibility is a core foundation of the Company's commitment to environmental sustainability. All employees must act ethically in regards to environmental issues to further the goal of helping people live better and to ensure a better world for generations to come.

The Company is also committed to protecting the health and safety of its employees, clients and communities because the Company cares for all parties' well-being. Conducting business in compliance with all health and safety laws is crucial to protecting all parties from harm. Employees of the Company must always comply with all relevant health and safety laws and policies and never ignore a potential health and safety concern. Acting ethically in regards to health and safety issues is critical to the corporate goal of providing a safe shopping and working environment. If any employee has questions regarding environmental or health and safety issues, they should contact Human Resources.

## Data Privacy

The Company processes and protects personal data in compliance with data privacy laws. The Company complies with data privacy laws when collecting and processing personal data, including as it relates to its own



people, its clients and suppliers. Data privacy laws also give rights to individuals regarding their personal data.

The Company processes personal data fairly and lawfully and provides access to personal data within its organization only on a need-to-know basis. When someone provides the Company with their personal data, the Company tells them who is collecting/using the data, the intended use and respect their individual rights to the data, including access and correction. The Company does not re-use personal data for other purposes incompatible with the intended use, and the Company minimizes and anonymizes data collection where feasible. The Company maintains retention policies and procedures; when it no longer needs to keep personal data, it is destroyed. The Company maintains organizational, physical and technical security arrangements for the personal data it holds.

During daily business, Company employees may be exposed to personal and business information about employees, clients, suppliers and the Company itself. It's each employee's responsibility to protect this information in accordance with applicable laws, Company policies (including our records retention requirements), and Company beliefs. Information may be physical (on paper) or electronic. Employees should only collect or save company business information needed to perform their job. They must manage such information securely through its lifecycle and in accordance with the Company's records management requirements. Confidential company information is divided into three classes of data: highly sensitive (high security), sensitive (medium security) and non-sensitive (low security).

Examples of ways to protect highly sensitive or sensitive information include:

- Accessing the information for business purposes only
- Sharing it with other employees for legitimate business purposes only
- Preventing unauthorized access (for example, locking up highly sensitive data)
- Returning all highly sensitive and sensitive information to The Company along with any other The Company property upon termination of employment
- If there is no business need for keeping the data and no hold for legal purposes, dispose of it by placing it in a shredder or confidential bin; never throw it in the trash.

If an employee believes they have confidential company information that needs to be shared outside the company, they should seek approval from their manager who will escalate appropriately before sharing such information. Trade secrets are an example of business data that employees must protect. All trade secrets are highly sensitive data and must be kept



secure. In addition to protecting the Company's trade secrets, the Company's policy to respect the trade secrets of others. No employee may reveal the trade secrets of the companies with which the Company conducts business or companies with which employees were previously employed.

All employees should ensure their use of social media does not compromise the confidentiality of Company trade secrets, highly sensitive or sensitive business information.

Personal information about customers, members, suppliers and vendors must also be securely managed. Employees should not access or collect such information unless necessary to perform their job and only as directed by their manager. If any employee suspects there may be a breach of such personal information, they should notify a member of management or Human Resources. Employee medical information shall be treated in the same manner.

Specific departments within the Company may have special privacy rules or procedures. All employees must read, understand and stay current on information that applies to their specific areas of the business and job functions. Additionally, all employees must follow the applicable records management requirements. If employees have questions about record-keeping requirements that apply to their job, they should contact Human Resources for assistance.

## Media Statements

Communication in the age of social media has changed the way we live and work. When events are unfolding or when people are simply looking for information, employees may be viewed as a source of information about the Company. As employees talk with family members, clients and suppliers or participate in social media, they are encouraged to share the Company story. If asked questions and unsure of the answers, one should not feel pressured to answer them, simply lead them to our many resources, including the corporate website: <http://www.fr8hub.com>. Our employees play a critical role in sharing information with the public when unfortunate disasters occur or when communities are in need. With regards to making public statements to media outlets such as television, news stations, local newspapers or trade publications, the Company must ensure the accuracy of all information it provides to the public. Any employee must receive prior written approval from the CEO or CFO before making any public statement, whether written or verbal, to such media outlets. For statements about financial matters, contact the CEO or CFO prior to making any statement or conducting any interview.



## Final Disclaimer

This Code of Conduct provides an introduction to the responsibilities of all Company employees, along with a reference to certain important policies. It's an important part of each employee's employment with the Company; however, it's not intended to create an express or implied contract of employment in and of itself. It is also not inclusive of all applicable company policies. Furthermore, the Company's policies may be modified at its sole discretion, without notice, at any time.

Employment with the Company is on an at-will basis — where permitted by law — meaning employees are free to resign at any time for any or no reason. Violations of this Statement of Ethics may result in disciplinary action up to and including termination.

### Human Resources Contact Information

Access numbers may change. Refer to [Codeofconduct@fr8hub.com](mailto:Codeofconduct@fr8hub.com) for the most updated access numbers by country if you experience difficulties.



## Version Control

Version	Change Description	Author	Reviewed By	Review Date	Approved By	Approval Date
1.0	Initial Version	Antonio Abascal (Strategy Lead)	Mario Mena (HR Director)	16/03/2021	Paul Freudenthaler (CFO)	30/03/2021