



THE SUDDATH COMPANIES

CODE OF BUSINESS CONDUCT & ETHICS





Since our founding in 1919, the success of The Suddath Companies has been based on determination, hard work, a healthy mix of individuality and teamwork, a winning spirit and an unwavering commitment to honesty and integrity in everything we do.

Today's business environment is complex, and our own industry has seen many changes in recent years. Throughout these transitions, one core Suddath belief has remained constant:

maintaining our good name rests on each individual taking personal responsibility for their conduct.

Suddath has experienced significant expansion in our 100-year history. With growth and success comes a higher level of responsibility to do the right thing. From the inside out, our goal is to equip you with the values we are committed to as an organization, and the tools you need to fulfill your important role on our team.

A key step in meeting our day-to-day ethics and compliance responsibilities is to be mindful of our commitments to each other, our customers, our business partners and the communities where we work and live. This Code of Business Conduct and Ethics

provides information about our responsibilities, including compliance with the law and the application of our good judgment each and every day. As a member of the Suddath team, we encourage you to make an individual impact through personal standards of excellence, demonstrating our values and honoring the Code.

This Code isn't exhaustive and won't answer all of your questions or address every situation, which is why we have established resources to answer questions and follow up when problems occur. If you are unsure of what to do in a particular circumstance or concerned that the Code, our policies or regulations are being broken, you have a responsibility to speak up. A problem can't be resolved unless it has first been identified.

As a forward-thinker in global transportation, logistics and relocation management, we constantly seek out new ways to make a positive contribution to the economy, community and environment through our core business activities, social investment and philanthropic programs.

I believe the quality of our people and our commitment to our values – Trust, Innovation, Teamwork, Caring and Agility – will drive our continued success. I also know that we are stronger together. When we all work in line with our values and this Code, and we all work toward the same goal, there's nothing that can get in the way of our best future.

Always remember, integrity matters.

Michael J. Brannigan

President & Chief Executive Officer, The Suddath Companies

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OUR VALUES

TRUST

Acting with integrity, fulfilling promises, being reliable, transparent and trustworthy

INNOVATION

Innovating, encouraging passionate and creative ideas for problem-solving, always improving

TEAMWORK

Winning together as one global team, committed to our customers and common success

CARING

Caring about each other, our customers, partners and community

AGILITY

Agile, flexible, thinking and acting quickly, readily adapting to changing market needs



DRIVEN BY PEOPLE

DRIVEN BY PEOPLE

At Suddath®, we are driven by people. We hold ourselves and each other to the highest ethical standards. In our everyday interactions, we treat people fairly and honestly to create meaningful and lasting relationships. Our corporate values of **Trust**, **Innovation**, **Teamwork**, **Caring** and **Agility** aren't just words. They're embedded in our culture and the way we work. We live by these values and in doing so we positively impact our world.



A photograph of four diverse professionals walking on a paved path outdoors. From left to right: a woman in a white short-sleeved shirt and white pants, a woman in a red long-sleeved top and black pants, a man in a light blue long-sleeved shirt and dark pants, and a woman in a pink long-sleeved top and blue jeans. They are all smiling and appear to be in conversation. The background shows trees and a building, suggesting a corporate campus setting. The image is overlaid with a dark blue tint.

OUR CODE

OUR CODE

Our Code of Business Conduct and Ethics (Code) demonstrates our commitment to our values - Trust, Innovation, Teamwork, Caring and Agility.

When we live by our Code, we communicate more effectively, respect one another, comply with applicable laws and regulations and compete with integrity. Our behaviors create better work experiences for ourselves and for those with whom we interact.

How to Use Our Code

Consider our Code a guide. It walks you through scenarios, requirements, business practices and procedures. Of course, our Code can't address every situation that you might encounter. If you find yourself in circumstances that aren't covered, remembering our core values can help you do the right thing. If you're unsure of what to do or how to act, our Code provides information and resources to lead you in the right direction.

Does the Code Apply to Me?

Yes. Our Code, as well as all of the policies and regulations referenced in the Code, apply to all of our employees, contractors, agents, suppliers, business partners and all other third parties with whom we engage directly.

What are My Responsibilities?

- Know our Code.
- Act professionally and ethically.
- Complete all required training and certifications.
- Report good-faith concerns about violations of our Code.
- Cooperate with investigations.
- Keep accurate records.
- Lead by example.
- Respect one another.
- Communicate openly and honestly.
- Be a team player.

OUR CODE

Speak Up

We are all expected to comply with our Code, promote our speak-up culture, and use good judgment. We strive to provide a work environment which encourages employees to speak up when they witness something that does not conform to our Code or applicable laws. We also strive to create a culture in which everyone feels comfortable and safe in speaking up without fear of retribution. We do not tolerate or condone retaliation of any form.

If you have a good-faith concern about a violation of law or our Code, speak up! You can report anonymously (where permitted by law) by contacting a supervisor, Human Resources, our Compliance Officer, our Compliance Helpline or Legal.

Reported concerns are investigated promptly. If there is a violation of law or our Code, we take action to correct it, which may include discipline, up to and including termination. In some cases, violations may also result in legal proceedings and penalties, including criminal prosecution.

I overheard fellow employees making plans to haul away scrap materials left behind after a customer project because they wanted to sell it. Is this ok?

No. The scrap material is not theirs to sell and doing so would be a violation of our Code. Report this concern to your supervisor, Human Resources, our Compliance Officer, our Compliance Helpline, or Legal.

A photograph of four people (three women and one man) sitting around a white table in a modern office setting, engaged in a conversation. The image is overlaid with a dark blue semi-transparent filter. The man on the left is wearing a red patterned shirt. The woman next to him is wearing a black and white patterned sleeveless top. The woman in the center is wearing a dark blazer with white trim and glasses. The woman on the right is wearing a white long-sleeved top. A pink cushion with the text 'STEP' is visible behind the man on the left.

OUR WORKPLACE

OUR WORKPLACE

We are committed to a collaborative and professional work environment in which everyone is treated with respect and dignity. We all have the right to work in an atmosphere that promotes equal opportunities and which is safe and free from violence, threats, harassment, intimidation and discrimination.

Diversity

We respect diversity in thought, practice and culture. We accomplish more when our team includes people with diverse backgrounds, talents, and ideas.

For further guidance, refer to our [Diversity & Inclusion Policy](#).

Drugs and Alcohol

We provide a substance-free workplace. Substance abuse, whether of alcohol or drugs, including prescription drugs, poses a serious threat to our overall safety and health by creating dangerous working conditions.

Q
What if I think that I was passed up for a promotion because of my age?

A
If you believe that you were treated unfairly because of your age, discuss this matter with Human Resources, our Compliance Officer, our Compliance Helpline or Legal.

Q
A fellow employee returned from lunch with bloodshot eyes and smelling of alcohol. Do I have to report this?

A
Yes. We provide a substance-free work environment and this raises a potential safety concern. Immediately report your concern to your supervisor, Human Resources, our Compliance Officer, our Compliance Helpline or Legal.

OUR WORKPLACE

Harassment

We don't tolerate harassment of any kind, including verbal, physical, psychological or sexual.

For further guidance, refer to our [Harassment Policy](#).



Q One of my fellow employees consistently and jokingly refers to me in an insulting and disrespectful way. Could this be harassment?

A Yes. Talk to your supervisor, Human Resources, our Compliance Officer, our Compliance Helpline or Legal about it.

Q What if the person harassing me is my supervisor? I am afraid that if I complain I could lose my job.

A We do not tolerate harassment or retaliation. Report this concern to Human Resources, our Compliance Officer, our Compliance Helpline or Legal. Where allowed by law, you may report your concerns anonymously and we will maintain the confidentiality to the extent possible.

OUR WORKPLACE

Human Rights

We support human rights around the world. We provide reasonable working conditions and fair wages and will not use child or forced labor in any of our operations.

We don't tolerate or condone human trafficking or slavery and we expect the same from our business partners.

For further guidance, refer to our [Human Trafficking Policy](#).

Safety

We all have a shared responsibility to keep our workplace safe. Everyone needs to be familiar with and follow all safety guidelines and report unsafe conditions. If you see a hazardous condition or have a safety concern, speak up!

I suspect that the employees of one of our suppliers might be living at the supplier's office. Should I be concerned?

A Yes. This might be an indication of human trafficking. Report your good-faith concern to our Compliance Officer, our Compliance Helpline or Legal.

I saw a fellow employee operate a forklift in an unsafe manner. What should I do?

A Immediately report the unsafe behavior to your supervisor, Human Resources, our Compliance Officer, our Compliance Helpline or Legal.

OUR WORKPLACE

Workplace Violence

We don't tolerate violence, threats, intimidation or aggressive behavior. We treat and deal with any threat of violence the same as we would an act of violence.

For further guidance, refer to our [Workplace Violence Policy](#).

A fellow employee has recently become obsessed with weapons, blames everyone else in the office when things go wrong and has periodic emotional outbursts. I am concerned about my safety and the safety of others. What should I do?

A Immediately report this to your supervisor, Human Resources, our Compliance Officer, our Compliance Helpline or Legal so appropriate action can be taken.



A blue-tinted background image showing a business meeting. Several hands are visible, holding and pointing to various documents and papers. In the foreground, there is a folder labeled 'Contract' and a bar chart on a document. The overall scene suggests a professional collaboration or review process.

WE AVOID CONFLICTS OF INTEREST

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We are committed to competing fairly and with integrity. A conflict of interest exists when our loyalties are divided between our company and the interests of another person or entity. We should avoid conflicts of interest and even situations that could appear to be a conflict of interest. If you are aware of a conflict of interest (or even a potential conflict), you must report it.

For further guidance, refer to our [Conflict of Interest Policy](#).

Antitrust and Competition

We are committed to fair competition and require strict compliance with all applicable antitrust and competition laws, regulations and policies. While antitrust laws may vary across our global locations, they are designed to combat unreasonable restraints on trade and promote fairness in the marketplace.

We should never engage in activities with customers, suppliers or competitors that unfairly limit or prevent competition or give the appearance of doing so.

For further guidance, refer to our [Anti-Trust & Competition Policy](#).

Q
Can I share our internal pricing model with others in the industry?

A
No. Discussing our pricing model with others in the industry could limit competition and may be illegal.

WE AVOID CONFLICTS OF INTEREST

Bribery

We are committed to complying with all anti-corruption laws, regulations, and restrictions mandated by the Foreign Corrupt Practices Act, the UK Bribery Act, the Criminal Finance Act and other laws that govern corrupt practices, including bribery. We take our obligations to comply seriously and conduct due diligence on our suppliers. Penalties for violating anti-corruption laws can be severe.

We don't offer or accept bribes from third parties to win business or influence business decisions anywhere in the world.

For further guidance, refer to our [Anti-Bribery and Corruption Policy](#).

A customer has assured me that we will see an increase in business if we donate to a charitable organization where the customer's president sits on the board. Can we make the donation?

No. The requirement to make payment in order to secure additional business is considered bribery and is strictly prohibited.

WE AVOID CONFLICTS OF INTEREST

Company Assets

We all have a duty to use company assets responsibly and for legitimate business purposes. Theft, carelessness and waste directly conflict with our corporate values and negatively impact our productivity.

Computer resources, including email and internet access, help us do our jobs. Limited and occasional personal use is acceptable, but it should not interfere with your job duties or impact the performance of our network. There is no expectation of privacy while using our computer resources. Our assets and computer resources should never be used for illegal purposes.

I am responsible for planning and coordinating all social activities for my child's school. May I use my work computer and my work email when I'm working on it, if I do it on my personal time?

A No. This is an inappropriate use of our resources.

Is it okay if I use a copy machine at the office to make a copy of a personal document?

A Limited and occasional use of our resources for non-business purposes is okay if it does not interfere with your job duties.

WE AVOID CONFLICTS OF INTEREST

Friends and Family

It is a conflict of interest for family, friends or partners to report to you – or you to them. (However, some exceptions may be made for seasonal staffing.)

You may have a close friend or relative who works for one of our customers, suppliers or competitors, but those relationships should not influence our operations.

You should not recommend, or use your position with us to influence the use of, a supplier if you or your immediate family would receive personal benefits.



Q
My spouse owns a business and would like to work with us to provide services. Is this allowed?

A
You cannot be a decision-maker in awarding business on our behalf to your spouse's business. The business must go through our standard supplier vetting process without input or influence from you.

WE AVOID CONFLICTS OF INTEREST

Gifts, Gratuities and Business Courtesies

We are committed to competing solely on our merits. We don't give or accept gifts, gratuities or business courtesies that could be perceived as unfair business practices that would violate law, regulation or our policies or those of our suppliers or customers.

In the right circumstances, a modest gift may be a thoughtful thank you, or a reasonably-priced meal may be an appropriate setting for a business discussion. We may give non-monetary gifts (such as branded calendars, pens, t-shirts, other novelty promotional items, cookies, etc.) to our suppliers and customers. However, take extra caution when dealing with government customers and officials because special rules may apply.

For further guidance, refer to our [Anti-Bribery and Corruption Policy](#).

Q One of our suppliers offered me a weekend getaway for two that included round-trip airfare, hotel accommodations and tickets to a concert. Can I accept?

A No. This lavish entertainment package could be perceived as an attempt by the supplier to impact our purchasing decisions.

Q One of our suppliers sent me a gift card to a local restaurant. May I accept it?

A No. A gift card is a cash equivalent and it would violate our Code for you to accept it.

WE AVOID CONFLICTS OF INTEREST

Insider Trading

We are committed to fair and open markets for publicly traded securities. In the course of business, you may learn confidential information about publicly traded companies. You are prohibited from buying or selling securities based on this information or passing it on to others who then trade.

Money Laundering

We are committed to conducting business with reputable customers and suppliers and preventing the use of our assets and resources for illegal purposes, such as money laundering. As part of our efforts to prevent money laundering and terrorist financing, we conduct due diligence on our suppliers, we get to know our customers and we comply with all applicable laws, regulations and restrictions.

For further guidance, refer to our [Global Trade Compliance Policy](#).



WE AVOID CONFLICTS OF INTEREST

Outside and Personal Business Interests

We count on your good judgment and ability to make decisions that are in our best interest. You must disclose outside employment to your manager to ensure there is no conflict of interest. Do not use our assets or information for the benefit of an outside business or a personal interest.

You shouldn't have substantial investments or obligations to one of our customers, suppliers or competitors unless they are publicly traded on a national exchange and there is no possibility for a conflict of interest.

Owning a significant interest in any business that competes with us or seeks to do business with us is a conflict of interest.

Trade Controls

We do business with customers and suppliers around the globe. Whether goods, technology, service or information may be exported from one country to another, or whether we may provide a third-party with goods, technology, service or information, depends on the origin and destination, the type of goods, technology, service, or information and the individuals or entities involved. We comply with all applicable international trade compliance laws that prohibit certain transactions.

For further guidance, refer to our [Global Trade Compliance Policy](#).

Q My spouse and I own a business and I would like to use the information and contacts that I have developed while performing my job duties at work to grow my personal business. Is this allowed?

A No; this is a conflict of interest. While employed with us, you must not engage in any activities that compete with us.

Q I want to work part-time as a real estate agent. Is this acceptable?

A You can work at your part-time job as long as it does not create a conflict of interest and you have discussed your part-time employment with your supervisor.

WE PROTECT INFORMATION



WE PROTECT INFORMATION

We comply with all applicable confidentiality, privacy and data protection laws. We only obtain, access and use personal information for legitimate business purposes. Personal information includes national identification numbers, medical data, contact information, email addresses, pictures, etc., if such information can be linked to an identifiable person.

Confidential and Proprietary Information

We are committed to protecting the confidentiality and privacy of our records and proprietary information. We do the same with confidential or private information of our customers and suppliers and other third parties. We handle information with integrity and adhere to the principles of individual privacy.

We respect the intellectual property rights, confidential information and privacy of third parties. Any business intelligence regarding our competitors must be gained ethically and legally. We should not gain competitive information through theft, misrepresentation or other deceptive means.

Your confidentiality obligation continues even after your engagement with us ends.

For further guidance, refer to our [Confidentiality Policy](#).

I have access to information related to a customer's growth projection for the coming year and a friend has asked for a copy of it. May I provide the information?

No. Business plans, financial information and other customer information are considered confidential and can't be shared.

WE PROTECT INFORMATION

Q Our department uses a shared printer and when I went to the printer to get the documents I printed, there was a document that contained sensitive employee information mixed in with my documents. What should I do?

A Do not look at, or share, the document that contains the sensitive employee information. Immediately provide the document to Human Resources or our Compliance Officer.

Q I've been talking to a third party about a business opportunity that will require the exchange of confidential information. Do I need to have a Non-Disclosure Agreement (NDA) in place prior to exchanging information?

A Yes. We protect confidential information. Before either party discloses confidential or proprietary information, a Non-Disclosure Agreement must be signed. Please contact Legal for further guidance.



WE PROTECT INFORMATION

Intellectual Property and Innovations

Our intellectual property such as logos, service marks, blogs, marketing materials, software, new business concepts, etc. are valuable assets that give us a competitive advantage. You must disclose to us in writing any intellectual property that you create or develop while engaged with us.

Maintain and Retain Accurate Business Records and Reports

We maintain complete and accurate business records in compliance with applicable laws and industry standards. We properly document all of our business relationships.

Retention of business records must comply with applicable laws, and our document retention policy.

I helped develop a software solution that has streamlined our processes. May I use the same logic to develop a similar solution that I create on my own and publish for others to use?

No. The logic and solution are our intellectual property and should not be shared or used for any purposes outside of our business operations.

I think a fellow employee is falsifying time records. What should I do?

Report your concern to your supervisor, Human Resources, our Compliance Officer, our Compliance Helpline or Legal.

WE PROTECT INFORMATION

Q
I would like to take home copies of the flowcharts and project checklists I developed while performing my job duties. Is this okay?

A
No. The work you produce during your engagement with us belongs to us.

Q
I am preparing a response to an RFP and I want to use the logos of some of our customers in my presentation. Is that okay?

A
We can use our customers' names or logos but check with the marketing department to confirm that we have prior written permission.



OUR VOICE

A man with a beard and bald head, wearing a pink button-down shirt and a watch, is looking down at a smartphone in his hands. The background is a blurred cityscape at dusk or dawn, with a blue tint over the entire image. A thin orange horizontal line is positioned below the text 'OUR VOICE'.

OUR VOICE

We need a consistent voice when communicating our message and values. We are committed to honest, professional and legal communications. If you have questions about our activities, performance, or plans, contact the marketing department.

Social media can help us interact with customers and third parties while also sharing our corporate values. We need to be mindful of the information we post to ensure it complies with our policies, values and all obligations of confidentiality.

Avoid speaking publicly on our behalf and do not give the impression that you are speaking for us in your personal communications.

For further guidance, refer to our [Social Media Policy](#).

Q I was attending a customer event and took pictures, including pictures that had our customer's logo and several of our customer's employees in it. May I post these pictures to social media?

A No. All social media posts for, and on our behalf, must go through our marketing department.



GIVING AND VOLUNTEERING IN OUR COMMUNITIES

GIVING AND VOLUNTEERING IN OUR COMMUNITIES

As part of our commitment to the communities we live in, we support many charitable and civic organizations and we encourage you to be active in causes that are important to you. Volunteer activities should not interfere with our work or create a potential conflict of interest.

Political Involvement and Contributions

We encourage and respect your right to participate in the political process. Your involvement is voluntary and must not create a conflict of interest. Do not make political contributions or statements regarding political matters on our behalf.





THE ENVIRONMENT

THE ENVIRONMENT

We're committed to implementing sustainable practices and using systems designed to minimize the impact of our operations on the environment. You are encouraged to reduce waste, support recycling efforts and find innovative ways to protect our natural resources.

As part of our commitment to the environment, we comply with applicable laws and use proper procedures when handling hazardous materials.



FINAL THOUGHTS



FINAL THOUGHTS

Our Code can't answer all of your questions or address every situation, so we've established resources to answer questions and provide guidance. If you are unsure of what to do in a particular situation or have concerns that our Code, policies or regulations are not being followed, you have a responsibility to speak up. We will not retaliate against anyone for reporting a good-faith concern about actual or potential misconduct or participating in an investigation.

Q I reported a good-faith concern to my supervisor regarding a questionable business practice. Since making the report, my supervisor has adjusted my job responsibilities and reduced my working hours. Is this retaliation?

A There may be non-retaliatory business reasons behind the adjustments. Discuss this matter with Human Resources, our Compliance Officer, our Compliance Helpline or Legal to ensure you have not been subjected to retaliation.

FINAL THOUGHTS

Considerations

Sometimes you may not be sure how to handle a specific situation. If you are faced with a difficult decision, ask yourself the following questions:

- Do I have all of the facts?
- Is it legal?
- How would it look if it appeared in the media?
- Does it comply with our Code and policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I be comfortable describing my decision to others?
- Does my behavior demonstrate ethical conduct and reflect our corporate values?

If you are still unsure about the proper course of action, seek guidance from your supervisor or other members of management, Human Resources, our Compliance Officer, the Compliance Helpline or Legal.

Remember, we strive to do more than simply comply with the law. We aim to do what is right, every time.

Compliance Helpline

Call Toll Free:

844-407-7265

Outside the United States, please use the following access codes prior to dialing the toll-free number:

- | | |
|-------------------------------------|--------------------------|
| ▪ China | ▪ France |
| North - 108-888 | Hotels 1 - 0-800-99-1011 |
| South - 10-811 | Hotels 2 - 0-800-99-1111 |
| ▪ Germany - 0-800-225-5288 | Hotels 3 - 0-800-99-1211 |
| ▪ India - 000-117 | Hotels - Paris Only - |
| ▪ Singapore | 0-800-99-0111 |
| SingTel - 800-011-1111 | Orange - 0-800-99-0011 |
| StarHub - 800-001-0001 | Telecom Development - |
| ▪ Spain - 900-99-0011 | 0805-701-288 |
| ▪ Switzerland - 0-800-890011 | |
| ▪ UK - 0-800-89-0011 | |

Make a Report Online:

www.suddath.ethicspoint.com

View Policies and Procedures:

Go to suddath.sharepoint.com and look for the Employee Handbook.

Contact Directly:

Compliance Officer: +1 (904) 390-7120

Human Resources: +1 (904) 390-7100

Legal: +1 (904) 390-7100

Marketing: +1 (904) 390-7100

