



# business ethics & employee code of conduct

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## **DO THE RIGHT THING, ALWAYS**



The collection of principles herein reflects the business ethics and corresponding relevant policies to which Green Worldwide Shipping (hereafter may also be referred to as “we”; “us”; “the Company”; “Green”) holds itself and its employees accountable.

Our reputation for doing the right thing, always, is at the core of our values and one of our 34 Fundamentals. It defines the way we manage the economic, social, safety and environmental aspects of our operation throughout the world.

This code of conduct will be supplemented internally with training addressing specific areas of compliance.



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## **I. INTRODUCTION**

The purpose of the Employee Code of Conduct is to set forth Green's general standards concerning ethical and legal conduct. It is complemented by our Business Partner Code of Conduct.

Together, these Codes govern the actions and working relationships between Green's employees, current and potential customers, suppliers, distributors, agents, competitors, government and self-regulatory agencies, the media and anyone else with whom Green has contact.

Through appropriate contractual arrangements, consultants, agents, distributors, service providers and suppliers of Green are expected to comply with the Business Partner Code of Conduct. In addition, these third parties shall respect that Green employees are bound by the Employee Code of Conduct and shall not encourage our employees to breach these Codes in any way.

## **II. BUSINESS ETHICS**

Beyond legal compliance, all Green employees are expected to observe high standards of business and personal ethics in the course of their job duties. This requires the practice of honesty, integrity and sound judgement in every aspect of dealing with other Green employees, the public, the business community, customers, suppliers, competitors, government and regulatory authorities.

It is important that we consciously reflect on our own behavior. Ask yourself:

- Did I behave in accordance with Green's values?
- Did I comply with this code of conduct and the law?
- If the story went viral or appeared on the front page of a newspaper, would I stand behind the decision I made?
- How would I feel if the situation were reversed, and I was on the receiving end of the behavior?
- Is the decision fair, professional and based on facts?
- Have I allowed my personal interests or judgement to influence my behavior?

Good ethical behavior may be above that required by law. It is Green's policy to operate our business in compliance with the highest ethical standards in every location in which we operate, so that the integrity and honesty of Green and our employees are never in question.

### **A. Misconduct**

If you become aware of or suspect any misconduct related to Green Worldwide Shipping's business, you must notify Green promptly.

The most effective way to report misconduct is to utilize the grievance mechanism described below.

### **B. Whistleblowing**

All employees, business partners, and any other individual can submit a whistleblowing grievance, without fear of retaliation, via the mechanism described below.

Green Worldwide expects its business partners to offer their own employees and business partners reasonable and sufficient reporting channels, including protection from fear of retaliation.

### **C. Ethics Advice and Violation Reporting (Grievance Mechanism)**

There is no easy answer to many ethical issues faced during daily business activities. In some cases, the right course of action will be evident, but in other more complex situations, it may be difficult to determine. There are a variety of options available for those with ethics questions or concerns:

- Green employees can contact their manager, or their manager's manager, to report violations or for advice and questions.
- Anyone can report violations or send ethics-related questions to [ethics@greenworldwide.com](mailto:ethics@greenworldwide.com).

If you are not satisfied with your response from the above methods, please contact the President of the Company, Thomas Jorgensen, at [tnj@greenworldwide.com](mailto:tnj@greenworldwide.com).

All reports are taken seriously and investigated, and if substantiated, resolved through corrective action and/or discipline. You can rest assured that any good-faith reports of violations will result in zero retaliation.

## **III. LEGAL & REGULATORY COMPLIANCE**

Green Worldwide Shipping complies with all relevant local, regional, national, and supranational legislation and regulations.

We require our employees to also comply with all relevant legislation and regulations.

We expect and require everyone working for Green to respect all anti-corruption, anti-trust and fair competition rules.

Please utilize our grievance mechanism to report any suspected violations of relevant legislation and/or regulations as it pertains to Green's business.

## **A. Conflicts of Interest**

Conflicts of interest have the potential to damage customer relationships and Green's reputation, as well as expose Green to legal consequences. Communication and vigilance are therefore imperative to ensure that you do not put yourself in situations where your personal interest or relationships conflict with ours. You must be professional, unbiased, and impartial when you represent or work with Green. It is important that even the appearance of a conflict of interest be avoided. The decisions you make must not be influenced or perceived to be influenced by any personal or private opportunities or relationships, potential financial gain or other benefit to you or a third party including a friend, relative or business associate.

## **B. Bribery and Corruption**

Green explicitly prohibits bribery and corruption in all forms, whether direct or indirect, in all parts of the world in which we operate. Specifically, Green prohibits making or causing to be made the offer, promise, gift, or authorization of payment of other benefit, favor or hospitality, whether directly or indirectly, to any government official to influence or with the intention to influence an action, inaction, or decision to obtain or retain business advantage for Green.

A government official includes any public official or officer or employee of government anywhere in the world, at any level.

Regardless of local practice, Green does not allow under any circumstances the making of "facilitation payments," i.e., payment to a government official for routine governmental action (such as processing papers, issuing permits, etc.), in order to expedite performance of duties.

## **C. Commercial Bribery**

Green does not tolerate the offering, making, requesting or receiving of payments in kind (gifts, favors, charitable donations, etc.) to influence individuals to award business opportunities to Green or to make a business decision in Green's favor.

## **D. Gifts, Entertainment and Sponsorships**

Gifts and entertainment given and received as an award or encouragement for preferential treatment are not allowed. In certain circumstances, the giving and receiving of modest gifts and entertainment is acceptable. A business meal for example can provide a relaxed way of exchanging information. Nonetheless, depending on their size, frequency, and the circumstances in which they are given, they may constitute bribes, political payments, or undue influence. The key test we must apply is whether gifts or entertainment could be intended or even reasonably be interpreted as a reward or encouragement for a favor or preferential treatment. If the answer is yes, they are prohibited under Green's policy.

## **E. Trade Controls**

It is imperative that Green's employees pay attention to and comply with changing laws that govern international trade, including export controls, import requirements and economic sanctions (together "trade controls").

Trade controls typically cover:

- Imports from or originating in a sanctioned country
- Imports with a sanctioned entity or individual
- Business dealings with a sanctioned country, entity or individual
- The transfer of restricted product, software, technical data, or technology without a license by email, download, or disclosure from people in or from a sanctioned country
- The prohibition on engaging in certain boycotting activities, e.g., US Anti-boycott laws

## **F. Anti-Trust and Competition Laws**

Green is committed to the principles of free and fair competition. It is our policy to compete vigorously and effectively while always complying with applicable anti-trust laws. Accordingly, we must:

- Keep contact with competition to a minimum
- Not disclose to, seek from or exchange with competitors any commercially sensitive information such as price, contract negotiations, capacity, commercial strategies or plans, bidding intentions, customers or market share
- Not discuss commercially sensitive information in joint ventures with competitors or potential competitors unless it relates to a specific venture
- Not disclose commercially sensitive information when participating in trade or industry associations
- When selling services to or purchasing services from a competitor, only exchange information that is legitimately required to complete the transaction

It is illegal to enter into any agreement with a competitor concerning process, costs, terms, customers, markets, business plans or another other matter that could affect competition. A spoken agreement is as illegal as a written agreement.

Please utilize our grievance mechanism to report any suspected violations of relevant legislation and/or regulations as it pertains to Green's business.

## IV. HUMAN RIGHTS

At Green Worldwide Shipping, we set Human Rights requirements in two categories: Forced Labor and Operational Practices.

### A. Forced Labor

Green Worldwide Shipping is committed to eradicating, and prohibits the use of, forced labor<sup>1</sup>, human trafficking, modern slavery, and/or any other type of forced or compulsory labor in our global value chain. Green also requires that our suppliers and business partners have the same or similar commitment.

We require our employees to collaborate with us in these efforts. If you become aware of or suspect any use of forced labor in our global value chain, or conditions that create a risk of forced labor, you must notify Green promptly at [forcedlabor@greenworldwide.com](mailto:forcedlabor@greenworldwide.com).

We have implemented a comprehensive program that is designed based on the 5-step framework issued by the Organization for Economic Co-operation and Development (“OECD”)<sup>2</sup> and takes a risk-based approach that includes risk identification, assessment, mitigation, and due diligence.

Green Worldwide Shipping’s policy and program specific to forced labor can be found on our website at [www.greenworldwide.com/human-rights-due-diligence](http://www.greenworldwide.com/human-rights-due-diligence).

Moreover, the implemented program has been designed to meet the criteria of, but not limited to, the sample of legislation and regulations listed in Table 1.

**TABLE 1**

Name	Acronym	Issuing Jurisdiction
California Transparency in Supply Chains Act (2010)	CA-TISCA	State of California
EU Non-Financial Reporting Directive (2014)	EU-NFRD	European Union
US Federal Acquisition Regulation (2015) <sup>3</sup>	US-FAR	US; Dept. of Defense
United Kingdom Modern Slavery Act (2015)	UK-MSA	United Kingdom
Countering America’s Adversaries Through Sanctions Act (2017)	CAATSA	United States
Australian Modern Slavery Act (2018)	AU-MSA	Australia

<sup>1</sup> Green uses the term “forced labor” to refer to any and all types of coerced labor, such as, but not limited to, human trafficking, modern slavery, the worst forms of child labor, organ harvesting, indebted servitude, etc.

<sup>2</sup> OECD. 2016. "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition." Paris: OECD Publishing. doi:http://dx.doi.org/10.1787/9789264252479-en

<sup>3</sup> Includes any and all Re-Authorizations of this Act

Name	Acronym	Issuing Jurisdiction
Uyghur Forced Labor Prevention Act	UFLPA	United States

Green also provides our employees access to the US National Human Trafficking Hotline and all of its free resources as follows:

National Human Trafficking Hotline:  
 Call 1.888.373.7888 (TTY: 711)  
 Text: 233733  
<https://humantraffickinghotline.org>

**B. Operational Practices**

Within its operations, Green Worldwide Shipping shall respect the human rights and fair labor practices listed below:

- Provide all business partners, employees, jobseekers, and potential business partners with equal opportunity without discrimination and free of discriminatory criteria, including, but not limited to:
  - Ethnicity, race
  - Religion
  - Sex, sexual orientation, pregnancy, childbirth, medical conditions, gender identity, and/or gender expression
  - Age
  - Mental and/or physical disability
  - Ancestry, culture, national origin, citizenship status
  - Socio-economic, marital, and/or any other related status
  - Any other protected status not listed above
- Respect employee rights to associate freely and collectively bargain
- Ensure that employees can perform their work in an environment free from physical, psychological and/or verbal harassment or intimidation, or any other form of abusive conduct
- Pay all workers at least the minimum wage and benefits

**V. DIVERSITY, EQUITY & INCLUSION**

Green Worldwide Shipping believes in the power of diversity, that each one of us brings something unique to the table. As such we strive to achieve nothing short of equity for everyone at Green and those we work with, and we’re committed to creating a vibrant culture of inclusion.



We comply with all applicable diversity, equity and inclusion (DEI) and nondiscrimination laws as described in the Human Rights Operational Practices section of this Code. We expect our employees to consider how their business decisions affect diversity and inclusivity in our workplace, our supply chain and the communities where we conduct business.

We ask our employees to not only not practice or engage in any form of discrimination, but to be anti-discrimination. Be an ambassador, question your own unconscious biases and speak up when you see something wrong, unfair or unethical.

## **VI. HEALTH & SAFETY**

Green Worldwide Shipping is committed to conducting all of its business in compliance with all applicable safety, health and workplace laws and regulations in a manner that has the highest regard for the safety and health of its employees.

We expect every employee to be responsible for their own safety and behave in a safe manner. In addition, we request that employees advise their co-workers immediately whenever they see anyone acting unsafely.

Green is committed to providing employees a safe workplace. We will provide the necessary tools and training to ensure our employees are able to do their job and conduct business in a safe manner.

## **VII. CONFIDENTIALITY AND INTELLECTUAL PROPERTY**

Green employees and its business partners shall protect information and respect Intellectual Property (“IP”), including, but not limited to:

- Respecting the legitimate proprietary rights and IP rights of Green and others.
- Taking proper care to protect confidential, personal, proprietary, and sensitive information
  - Any such information shall be collected and shared only when absolutely necessary and/or legally mandated
- Protecting the information exchanged from destruction, disclosure, modification, unauthorized access and usage.
- Maintaining accurate records, including all transactions and expenses.

## **VIII. ENVIRONMENT**

The transport sector has the highest reliance on fossil fuels of any sector and is one of the largest sources of global greenhouse gas emissions. Global supply chains have

massive impacts on air, land, water, and biodiversity. As an ever-evolving, innovative logistics company, Green recognizes the responsibility and the opportunity we have to mitigate and transform these environmental impacts in pursuit of a sustainable world.

Green Worldwide Shipping is committed to measuring, minimizing, and improving the environmental impacts of our business locally and globally, with a particular focus on immediate reductions of greenhouse gas (GHG) emissions. Green also requires that our suppliers and business partners have the same or similar commitment.

We require our employees to adhere to all applicable environmental laws, regulations, ordinances, rules, permits, licenses and approvals in every country in which we operate. This includes environmental reporting and disclosure requirements. Among others, Green follows rules and regulations administered by the U.S. Environmental Protection Agency (EPA), the U.S. Occupational Safety and Health Administration (OSHA), and the U.S. Department of Transportation (DOT) regarding hazardous materials.

It is critical that our employees and business partners operate in a manner that conserves natural resources, promotes resilience, and protects the environment.

Green employees are expected to support our efforts to identify and mitigate our environmental risks and impacts, reduce GHG emissions, and implement a comprehensive environmental management system designed on the principles of ISO 14001: 2015.