



# business partner 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 its business partners 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.

We partner with businesses that enact these same high standards.



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## **I. INTRODUCTION**

The purpose of the Business Partner Code of Conduct is to set forth Green's general standards concerning ethical and legal conduct. It complements our Employee 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 this 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 business partners are expected to observe high standards of business and personal ethics in the course of their job duties related to doing business with Green. This requires the practice of honesty, integrity and sound judgement in dealing with Green employees, the public, the business community, customers, suppliers, competitors, government and regulatory authorities.

### **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 business partners, as well as employees 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.

Anyone can report violations or send ethics-related questions to [ethics@greenworldwide.com](mailto:ethics@greenworldwide.com).

If you are not satisfied with the response, 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 requires our business partners to comply with all relevant local, regional, national, and supranational legislation and regulations.

We expect and require everyone working with 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. Bribery and Corruption**

Green prohibits its business partners from 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.

### **B. 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.

### **C. 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, you must not make such an offer to us.

### **D. Trade Controls**

Green's business partners must comply with 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

### **E. 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, our business partners that are also our competitors must:

- Keep contact with us to a minimum
- Not disclose to, seek from or exchange with us 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 us unless it relates to a specific venture

- When selling services to or purchasing services from us, 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 requires that our business partners have the same or similar commitment.

We also require our business partners 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 strongly encourage our business partners to implement a comprehensive program like ours, which can be found on our website at [www.greenworldwide.com/human-rights-due-diligence](http://www.greenworldwide.com/human-rights-due-diligence). We recommend a 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.

Your implemented program can be 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

<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>

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

Green also provides our business partners 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**

Green Worldwide Shipping requires that its business partners 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

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



- 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 expect our business partners to comply with all applicable diversity, equity and inclusion (DEI) and nondiscrimination laws and to consider how their business decisions affect diversity and inclusivity in their workplace, their supply chain and the communities where they conduct business.

We ask our partners 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 expects our business partners to share our commitment to conducting all 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 employees.

We expect you to provide your employees a safe workplace and the necessary tools and training to ensure they are able to do their jobs and conduct business in a safe manner.

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

Green's 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.

Green Worldwide Shipping requires our business partners to support our commitment to measure, minimize, and improve the environmental impacts of our business locally and globally, with a particular focus on immediate reductions of greenhouse gas (GHG) emissions. We encourage our business partners to make the same or similar commitment.

We require our business partners to adhere to all applicable environmental laws, regulations, ordinances, rules, permits, licenses and approvals in every country in which they operate. This includes environmental reporting and disclosure requirements.

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

We ask our business partners to invest in business practices and systems that enable identifying and managing environmental risks, measuring, and monitoring environmental performance, and driving continuous improvement of corporate environmental impacts.

Green expects that all business partners will work collaboratively to provide all environmental data that the business partner has readily available.