



## CORPORATE STATEMENT OF

# ETHICS

HELPING EMPLOYEES CONDUCT BUSINESS WITH THE HIGHEST  
DEGREE OF ETHICS, INTEGRITY AND COMPLIANCE WITH LAWS  
AND REGULATIONS.



# MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

DEAR COLLEAGUES,

APL Logistics (“APL Logistics”) is committed to conducting business with the highest degree of ethics, integrity, and compliance with laws worldwide and our corporate culture. The following Corporate Statement of Ethics (the “Statement”) reflects this commitment. I write to you on behalf of the Board, senior management and myself to express our unwavering support for the Statement of Ethics as one of the backbones of our company’s culture.

APL Logistics’s Statement of Ethics provides our directors, officers and employees with the policies that govern our global business. The Statement of Ethics is a foundation for our long-term success. It requires behavior that goes beyond simply complying with applicable laws, expecting all APL Logistics employees to be honest and conduct themselves with integrity.

The Statement of Ethics is designed to provide direction on how to act in accordance with the company’s high ethical standards. It is important that you understand and follow the Statement of Ethics, comply with all applicable laws, and refrain from business situations that would compromise APL Logistics’s integrity.

You are APL Logistics’s first line of defense against violations of the Statement of Ethics. If you see or suspect that unethical or illegal behavior has occurred, come forward with your concerns. More information on how to speak up can be found at the **APL Logistics Employee Hotline site**. Above all, do not abandon your responsibility because of fear. We will not tolerate retaliation against anyone who raises issues in good faith and any resulting investigation will be conducted as discreetly as possible. (You may remain anonymous if you wish.) Remember that the APL Logistics Legal Department, Human Resources and your supervisor are available to provide help with questions regarding the Statement of Ethics.

We are all responsible for upholding and abiding by the Statement of Ethics. Ethics, integrity and compliance with internal policies and laws are vital to APL Logistics’s future success. Please do your part by reporting any issues or problems that come to your attention.

Best regards,



# USING THE STATEMENT OF ETHICS

This Statement of Ethics provides guidance to help employees conduct business with the highest degree of ethics, integrity and compliance with laws, regulations and management expectations. It provides details on policies, expectations and what to do if you have questions or concerns about ethical behavior.

No document, however detailed, can provide answers to every question or address every circumstance. This Statement provides a high-level picture of what integrity and ethics mean to APL Logistics and a roadmap to help navigate through some of the more common ethical issues. Additional guidance is available through related corporate policies on the Intranet, by speaking with your manager or by contacting the APL Logistics Ethics Reporting Resource. This Statement is not meant to be exhaustive, but is a helpful anchoring point for understanding your ethical obligations.

From time to time, changes in the business context or regulatory environment will create a need for new principles, standards or guidelines. This Statement and related corporate policies are therefore subject to change without advanced notice at any time.

## APL LOGISTICS POLICIES

This Statement of Ethics covers policies across an array of subjects. Additional details on these policies can be found on the Company Intranet. Available company policies include:

- **Corporate Code of Conduct**
- **Competition/Antitrust Policy**
- **Gifts, Hospitality and Entertainment Policy**
- **Global Corporate Communications Policy**
- **Global Data Privacy Policy**
- **Information Security Computing and Internet Use Policy**
- **Outside Employment Guidelines**
- **Recommendations On How to Deal With and Resist a Demand for Bribery or Facilitation Payment**
- **Vendor Code of Conduct**

## OUR BELIEFS

At APL Logistics, we have strong values of responsibility and integrity. We are committed to an environment where open, honest communication is the expectation and not the exception. This promotes our culture of integrity and ethical decision-making. We want you to feel comfortable when approaching your supervisor or management with questions about policies or concerns about behavior inside and outside of APL Logistics.

Our employees are our most important asset. We all have the right to work in a positive environment. With that right comes the responsibility of acting in an ethical manner and speaking up if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment.

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# INTRODUCTION

## WHO IS COVERED BY THIS STATEMENT?

It is our policy to comply with all applicable laws and regulations and to conduct business in an ethical manner. The highest standards of conduct are required of our employees and all other persons who act on our behalf, including contractors, agents and consultants. Violations of these policies will result in disciplinary action, including termination of employment.

## EMPLOYEE RESPONSIBILITIES

You should take some time to understand the standards outlined in this Statement of Ethics and the supporting company policies. You are expected to follow these principles, as well as:

- Abide by any other business conduct guidelines that apply in your region
- Comply with applicable laws and regulations, even if not addressed in this Statement or the supporting company policies
- Ask questions if you are unsure of the appropriate course of action
- Challenge business practices or individual behaviors that undermine these principles

## MANAGEMENT RESPONSIBILITIES

If you are a manager, you should model appropriate conduct and ensure that employees you supervise understand the Statement of Ethics. Use good judgment and appropriate use of your authority to ensure your employees adhere to this Statement. You are responsible for keeping the channels of communication open, providing an environment where employees can present their ideas candidly. If a subordinate raises a concern which requires investigation or which you are uncertain about, contact the APL Logistics Ethics Reporting Resource for assistance immediately.

# RAISING CONCERNS & SPEAKING UP

## WHAT HAPPENS WHEN AN ETHICS CONCERN IS RAISED

If you file a report to raise an ethics concern, it is entered into a secure server and will be available only to those individuals charged with evaluating the report (who vary based on the type of concern and location of the matter).

We will investigate every concern. Critical issues will be reported to the APL Logistics Ethics Committee.

## NON-RETALIATION

You can report violations or ask questions anonymously (if desired) and without fear of retaliation. APL Logistics will take reasonable precautions to protect your confidentiality. We will not tolerate any form of retribution against any person who reports known or suspected violations.

## HOW TO RAISE A CONCERN

If you are aware of any breach of APL Logistics's Statement of Ethics, or if you have questions or concerns regarding acceptable conduct, you should file a report through one of the following resources:

- **Website:** file online at **[www.APL Logisticsemployeehotline.ethicspoint.com](http://www.APLLogisticsemployeehotline.ethicspoint.com)**
- **Phone:** find local, toll-free phone numbers for your region on the website above or at the end of this document
- **Ethics Committee Members:** find a list of members on the Company Intranet
- **Human Resources (HR):** file with your country/region's HR personnel
- **Management:** file a report with your manager

# RAISING CONCERNS & SPEAKING UP

## IMMEDIATELY-REPORTABLE CRITERIA

All concerns should be reported. However, allegations relating to fraud, ethics or internal controls are more serious. Special care should be taken to report these immediately, and they will be reviewed by the Ethics Committee. Examples of such violations include:

- **Abuse of or fraud with company benefits.** Deceptive actions or misrepresentation of physical conditions related to benefit plans or time off policies.
- **Antitrust activity.** Conduct that prevents or restricts competition, including arrangements or discussions with competitors regarding price, boycotting suppliers/customers, allocating territories, trade allowances, marketing, production or other confidential information.
- **Breach of anti-bribery laws.** Bribery of foreign officials. This can include persons employed directly or by an enterprise owned/controlled by a foreign government, as well as private persons who have responsibilities similar to government employees.
- **Confidentiality and misappropriation.** Unauthorized use or disclosure of confidential company information, such as: company and customer non-public information, trade secrets, patents, trademarks, copyrights, research data, designs, unpublished financial information, marketing plans, etc.
- **Conflict of interest.** Personal interest sufficient to appear to influence a person's objective exercise of official duties. Examples include inappropriate vendor/customer relations or misuse of confidential information.
- **Data falsification.** Improper modification or omission of information in the company's records. Examples include misstatement or mischaracterization of revenues, expenses or assets.
- **Data privacy.** Insufficient steps taken to protect against unauthorized access to personally identifiable data of employees, customers and other third parties in the company's possession.
- **Embezzlement.** Appropriating the company's property fraudulently to one's own use. Examples include intentional bookkeeping errors, misapplication of funds and mishandling of cash.
- **Environmental protection.** Violation of any environmental law, regulation or corporate policy with respect to the handling and disposal of hazardous materials or the health and safety of other individuals.
- **Export control violation.** Violations of export control regulations, including both physical exports and deemed exports.
- **Falsification of business documents.** Altering, fabricating, falsifying or forging documents, contracts or records for the purpose of gaining advantage or misrepresenting value.
- **Finance matters.** Recording and analysis of financial transactions not in accordance with generally accepted accounting principles. Examples include misstatement or mischaracterization of revenues, expenses or assets.
- **Gifts and entertainment.** Inappropriate offering, solicitation or accepting of items of more than nominal value from vendors, customers or other third parties.
- **Government contracts.** Failure to comply with applicable federal, state, province or local laws, regulations and contracts relating to government business.
- **Improper supplier or contractor activity.** Conduct in violation of corporate policies, such as improper supplier selection based on personal gain or improper negotiation of contract awards.
- **Insider trading or other securities violations.** Any infringement of securities acts rules, such as insider trading, which is the act of trading securities while in possession of material non public information about the company.
- **Misleading sales, marketing or advertisement.** False or deceptive advertising, packaging, displays, promotional materials or messaging.
- **Misuse of assets or services.** Use of company resources or equipment without permission for non-business reasons.
- **Safety.** Failure to meet requirements needed to perform duties in a secure environment. Examples include OSHA violations, poor housekeeping and violence or the threat of violence.
- **Theft.** The act of stealing or otherwise removing company or personal property with the intent to deprive the rightful owner of it.
- **Violation of policy.** Actions that are in direct violation of company policy, procedures, code of conduct or contractual responsibilities. Policy examples include non-disclosure agreements, hiring standards, safety standards, internet usage policies and corporate guidelines.

# LEADING WITH INTEGRITY IN OUR **WORKPLACE**

## ALCOHOL & DRUG FREE WORKPLACE

All employees deserve a safe and healthy workplace. Therefore, we expect a substance-free work environment and prohibit alcohol and drug abuse occurring in or impacting the work environment. Subject to and as allowable under local work rules and/or applicable laws, the use, transfer, sale or possession of illegal drugs, alcohol or other controlled substances at an APL Logistics facility or while conducting APL Logistics business is prohibited.

## DISCRIMINATION & HARASSMENT PREVENTION

APL Logistics will not tolerate acts of discrimination, harassment or violence.

We prohibit unwelcome verbal or physical conduct directed at employees based on race, ancestry, color, age, national origin, ethnicity, religious creed or belief, physical or mental disability, marital or familial status, legally protected medical condition, genetic information, military or veteran status, sex (including pregnancy, childbirth, breastfeeding, or related medical condition), gender (including gender identity and gender expression), sexual orientation, citizenship status, protected activity (such as opposition to or reporting of prohibited discrimination or harassment) or any other status or classification protected by applicable federal, state and/or local laws. Unacceptable practices include bias in hiring, bias in assignments, wrongful termination, bias in promotions, bias in educational decisions and unfair compensation.

Do not commit acts that harm the physical or mental well-being of other employees. This includes physical bodily harm, the threat of bodily harm, harm or threat of harm to a person's property, verbal abuse or the use of inflammatory, derogatory, unduly critical or insulting language.

Making unwanted sexual advances or sexually offensive remarks or acts is unacceptable. Those in superior or supervisory positions should be especially cautious, as such behavior can be construed as a condition of continued employment, promotion or satisfactory evaluation.

## INAPPROPRIATE CONDUCT

We are committed to providing a positive work environment that is free from tensions involving matters that do not relate to the business of the company.

Regardless of your level, you are expected to contribute to the following principles:

- Respect each employee as an individual, showing courtesy and consideration, and foster personal dignity, trust and integrity
- Encourage each employee to contribute to his or her fullest potential, being neither advantaged nor disadvantaged by identification with any particular group, race, color, age, gender, sexual orientation, religion, nationality, mental or physical capacity or disability
- Provide and maintain a safe, healthy and orderly workplace, free of harassment

Conduct outside of these guidelines will be considered inappropriate and handled according to the APL Logistics Code of Conduct.



## CONFLICT OF INTEREST

All employees must act in the best interest of the company in the performance of their job. You must not perform services for or have a material interest in a company that is a supplier, customer or competitor of APL Logistics.

Examples of potential conflicts include: contracting with a supplier managed or owned (in part or in full) by an employee, a relative or close friend; working independently as a consultant to a supplier or customer; running a private business of your own in the same industry.

If you find yourself in a situation that presents the possibility of a conflict of interest, you must disclose this to your manager.

Unless written consent has been obtained, no supplier, vendor or adviser whose spouse or immediate relative is an employee of APL Logistics shall be engaged in services for and/or on behalf of APL Logistics. Additional information can be found in the APL Logistics Code of Conduct.

## OUTSIDE EMPLOYMENT

If you wish to engage in business activities outside APL Logistics, you should discuss this with your manager and get written approval. Outside work is not permissible when:

- It's for a customer, competitor or supplier of the company
- It lessens your efficiency, alertness, interest or productivity
- It appears to impair your independent judgment you are required to exercise on behalf of the company

In the event of any questions or concerns, you should notify the Human Resources Department to determine if prior approval is required.

Violation of these guidelines is sufficient grounds for disciplinary action, up to and including termination of employment. Additional information can be found in the APL Logistics Outside Employment policy document on the Company Intranet.

## RELATIONSHIPS WITH SUPPLIERS

You should not engage in activity that is in violation of company policy, including:

- Supplier selection based on personal gain
- Improper negotiation of contract awards
- Performing services for or having a material interest in a company that is or may be a supplier

Examples include contracting with a supplier managed or owned by an employee, relative or close friend or working independently as a consultant to a supplier. Unless written consent has been obtained, no supplier should be engaged whose spouse or immediate relative is an employee of APL Logistics.

You are expected to honor all lawful obligations to former employers, which may include restrictions on the use and disclosure of confidential information learned or obtained during your former employment, restrictions on recruiting former colleagues to work at APL Logistics and non-compete agreements. Complying with a restrictive covenant with a former employer is an individual responsibility, and you are not permitted to create risk or consequences for the company by violating any such agreement. The company requires prospective employees to disclose restrictive covenant agreements to the Company prior to an offer and acceptance of employment.

Laws in various locations may impose requirements and restrictions on government employees related to post-government employment in the private sector. These laws restrict the former government employee's activities after he or she leaves the government and accepts employment with a private company. Before engaging in any discussions related to possible employment or entering into a business opportunity with a current or former government employee, management should seek guidance from Human Resources and Legal.

Former government employees are reminded that they must adhere to any government ethics and related requirements that are greater than what is required by Company policies and should report any such obligations to management and Human Resources.

# LEADING WITH INTEGRITY IN OUR **WORKPLACE**

## GIFTS & ENTERTAINMENT

### GIFTS

You may not accept gifts from customers, suppliers, vendors or other persons in a business relationship with APL Logistics unless it is within the traditional customs in the country you are in or it would be discourteous to reject the gifts presented. Even under these circumstances, you should not accept gifts valued at more than 150 U.S. dollars. You are required to declare any gifts received through the electronic **Gift Hospitality Entertainment Declarations System** on the Company Intranet.

You are allowed to provide corporate gifts bearing the logo, emblem or name of the company to a customer, supplier, vendor or any other persons in a business relationship with APL Logistics. Non-corporate gifts may be given if they are:

- Reasonable, not excessive or lavish
- With the intention to improve the image of the company or build a business relationship
- In compliance with the **Gifts, Hospitality and Entertainment Policy**
- Under 150 U.S. dollars in value (or pre-approval has been received, if over)
- Not a gift of cash or a cash equivalent (such as gift cards)

Additional guidelines for giving and receiving gifts can be found in the **Gifts, Hospitality and Entertainment Policy** on the Company Intranet.

### HOSPITALITY AND ENTERTAINMENT

As hospitality and entertainment are considered gifts, employees are required to declare hospitality and entertainment received through the electronic **Gift Hospitality Entertainment Declarations System** on the Company Intranet.

Exercise care when giving or accepting business lunches, dinners, hospitality and entertainment. These activities should be:

- Consistent with accepted business practices
- Reasonable, not excessive or lavish
- For the purpose of improving the image of the company, building a business relationship, completing a business transaction or as a platform to present products and services

Hospitality in any form that would likely result in a feeling of personal obligation by the recipient should not be accepted or given.

Entertainment may not take place where the recipient is not accompanied by an employee of APL Logistics. Hospitality may also not be given when it can be considered as a personal benefit to the recipient unrelated to the promotion of the company.

Additional guidelines for giving and receiving hospitality and entertainment can be found in the **Gifts, Hospitality and Entertainment Policy** on the Company Intranet.

## COMPANY ASSETS

### USE OF COMPANY FACILITIES

Facilities should be used for official purposes only. However, personal use is permissible as long as it does not:

- Interfere with worker productivity or company commitments
- Commit the company to any marginal costs
- Pre-empt or hinder any business activity
- Consist of any activity prohibited by law or under company policies

### USE OF THE INTERNET

Within company premises, you may access the internet only through the approved Internet Access Gateway. When your computer is connected to the company network, internet access via any other means (such as a wireless network) is strictly prohibited.

You may not use the internet on company computers for:

- Commercial or personal advertisements, solicitations, propaganda or promotions
- Subscribing to news groups and mailing lists for non-work-related purposes
- Entering into unauthorized transactions in the name of the company
- Dissemination of destructive programs such as virus software and self-replicating code
- Accessing systems owned by the company or other organization in ways not intended by the owner
- Carrying out inappropriate activity, such as disseminating material that is fraudulent, illegal, harassing, offensive, embarrassing, sexually explicit, obscene, threatening or defamatory
- Accessing software intended for entertainment and/or personal use, unless it has been pre-approved for business-related purposes



## PASSWORDS, CODES AND SECURITY

You must use passwords on all IT equipment, and under no circumstances should you share your passwords. The use of unauthorized codes or passwords to gain access to files is prohibited. If you need to share data or files, you should utilize company-approved services, such as message forwarding facilities, shared directories on local networks or intranet systems. All employees are forbidden from attaching any device (such as a USB drive) to the company's IT equipment without authorization.

You must log out of the company's system or lock your computer when leaving your desk for any period of time, and you must log out and shut down your computer at the end of each working day.

## OTHER POLICIES

- All downloaded software and email attachments must be scanned for computer viruses. Malicious code detecting software is provided on all company computers, and scanning is conducted automatically. You are not permitted to deactivate this software.
- All company policies on disclosure of confidential information apply when communicating over the internet. You must exercise the same level of caution to safeguard confidentiality as with other forms of communication. The internet is not a secure medium unless encryption or other security measures are in place.
- Misrepresenting or suppressing your identity on our electronic communication system is forbidden. Your user name, email address, organization and related information must be presented accurately in messages and postings.
- You may be required to comply with the internet use policies of third-party service providers.

## THEFT AND FRAUD

Theft of company funds or assets is a criminal offense. You should use company resources and information only for legitimate business purposes and protect them from theft, loss, damage or misuse. Intentional concealment, alteration, falsification or omission of information for your own benefit or the benefit of other individuals is fraud.

All instances of theft and fraud should be reported immediately. It is APL Logistics's policy to ensure that these offenses are promptly investigated and appropriate action is taken.

## MONITORING

The company has the right to monitor employee use of company systems. Monitoring may include the telephone system, mobile phones, email, chat rooms, websites, downloads and uploads. Monitoring is carried out to the extent permitted or required by law, and as necessary and justifiable for business purposes, including:

- Ensuring business is carried out if you are absent
- Finding and retrieving lost messages due to computer failure or cyber attack
- Assessing if the company's systems have been used in a manner contrary to this policy
- Assisting in the investigation of alleged wrongdoing
- General risk management

All emails transmitted using company facilities belong to the company. When monitoring emails, the company will look at the sender, recipient and subject of the email (avoiding opening emails marked as "Personal" in the subject line).

When monitoring telephones, the company will look at the numbers from which calls are received, the numbers dialed and the duration and frequency of calls.

The monitoring of internet usage may include internet used at and outside the workplace, during or outside working hours, using company systems.

The information obtained through monitoring may be shared internally with Human Resources, the employee's management, the Legal department, the Internal Audit department and the Ethics Committee. Information will usually only be shared when the company believes there may have been a breach of the employee's contract or this policy.

# LEADING WITH INTEGRITY IN OUR **MARKETS**

## FAIR COMPENSATION & FAIR DEALING

### FAIR DEALING

APL Logistics values its customers, suppliers and business partners. You should always deal fairly with these parties and treat them with honesty and respect. You must not take any unfair advantage of anyone through manipulation, concealment, deception, abuse of privileged information, misrepresentation of facts or other unfair practices.

### COMPETITION (ANTITRUST)

APL Logistics conducts business in countries that regulate anti-competitive practices. These laws are designed to promote competition among businesses and prohibit acts in restraint of trade. Employees are expected to comply with all applicable competition (antitrust) laws that prohibit anti-competitive or predatory business conduct, such as price fixing and monopolization of trade.

It is your responsibility to be familiar with the applicable laws and regulations. Violations can produce serious consequences both for the employee and APL Logistics such as criminal penalties, large fines and civil lawsuits. These requirements can be complex, and guidance is available through related policies on the Company Intranet. Should you require more information, please contact APL Logistics Legal.

## INTENTIONAL DISHONESTY

It is unethical to falsify, improperly modify or improperly omit information in the company's records, such as misstating or mischaracterizing revenues, expenses or assets. Employees shall not alter, fabricate or forge any part of a document, contract or record for the purpose of gaining an advantage or misrepresenting value or agree to alter the structuring of payment terms to circumvent internal approval processes.

## FINANCIAL INTEGRITY & ACCOUNTING IRREGULARITIES

You should maintain accurate and fair records of transactions, expense accounts, time reports, leave records, books, invoices and other company records. Ensure that checks and balances are in place to ensure that transactions are properly authorized, approved, implemented, recorded and retained for management review and audit.

Make no entries that conceal or disguise the true nature of a company transaction or record. The recording and retention of records shall be in adherence with the company's rules, applicable laws and regulations. If you believe that the company's books or records are not maintained within these standards, you should file a report or inform your manager or Legal immediately.

## INSIDER TRADING

It is both illegal and unethical to engage in trading (purchase or sale) of securities of a company while in possession of material, nonpublic information. Additionally, any employee who provides such non-public information to another person, who then bases a trade on the information, is subject to civil liability and criminal penalties which could range from fines to imprisonment.

# LEADING WITH INTEGRITY IN OUR **COMMUNITIES**

## ANTI-CORRUPTION

### **BRIBES AND FACILITATION PAYMENTS**

It is illegal to offer, promise or pay a benefit to anyone under the obligation of obtaining or retaining business or a business advantage, or to reward an action that is illegal or unethical. An offer to pay a bribe is punishable even if the bribe is not paid or accepted. Payment made through a third party is also prohibited regardless of how the payment is characterized.

Dealing through agents, joint venture partners and other third parties carries a particular risk of corruption and all exchanges are expected to be carried out in accordance with the **Gifts, Hospitality and Entertainment Policy**. Third party suppliers should agree in writing to APL Logistics's **Vendor Code of Conduct** available on the Company Intranet, which extends these guidelines to the company's business partners.

These principles apply regardless of whether the end recipient of the bribe is a government official or a private citizen, and regardless of whether the end recipient's employer is a government entity or a privately-owned entity.

You must also not solicit or receive any benefit that can influence you to act in a way that is illegal, in breach of good faith, unethical or in conflict with your employment obligations. It is an offence even if the bribe or reward was requested or accepted through a third party or if the advantage is for the benefit of another person.

Particular care should be taken when asked for money or gifts in circumstances where it is not clear that such request is legitimate. Payments that come with an obligation to perform a function, commonly known as 'facilitation' or 'grease' payments, are illegal. You should familiarize yourself with the **Recommendations On How To Deal With And Resist A Demand For Bribery Or Facilitation Payment** policy on the Company Intranet.

Any payments, gifts, favors or other must be in accordance with locally accepted business practices, reasonable and conservative bounds, and the **Gifts, Hospitality and Entertainment Policy**. Violations may result in disciplinary action, termination and/or potential criminal prosecution. Employees are expected to report any activities which they consider or suspect may breach these requirements.

## ANTI-MONEY LAUNDERING

All employees shall act in accordance with APL Logistics's policy that prevents money laundering and activities that facilitate money laundering or the funding of criminal activities. Money laundering is defined as engaging in acts for the purpose of concealing the true source of criminally-derived funds so they appear to be legitimate assets from legitimate origins.

We have set policies and procedures to detect and prevent suspicious activities and forms of payment and to train our staff on money laundering matters. We have procedures in place to ensure that we do not do business with persons included on lists of terrorists or terrorist organizations compiled by any national or international organization. Should you suspect that a party is attempting to use APL Logistics's services for illegal purposes, you must promptly inform your manager or Legal about the situation.

## AUTHORITY TO WORK

You must be legally permitted to work for APL Logistics in the country where you work, and you must meet all eligibility and permit requirements.

## ENVIRONMENTAL RESPONSIBILITY, HEALTH & SAFETY IN THE WORKPLACE

APL Logistics is committed to providing a safe, healthy and orderly workplace. Employees shall not violate any environmental law, regulation or company policy with respect to the handling and disposal of hazardous materials or the health and safety of other individuals.

# LEADING WITH INTEGRITY IN OUR COMMUNITIES

## PROTECTING PERSONAL & BUSINESS INFORMATION

### CONFIDENTIAL INFORMATION

You must protect the company's confidential information, which includes all non-public information such as internal communications, contracts, pricing, business and marketing strategies, financial information and personnel data. Confidential information should be disclosed within the company only on a need-to-know basis and in accordance with company policy. Confidential information should not be disclosed outside the company except when required by law or when necessary to further the company's business activities and in accordance with company policy.

Information from our customers, suppliers and business partners must also be handled appropriately. All terms and conditions contained in our contracts with such parties pertaining to the use and management of confidential information provided by them to us must be adhered to, so as to ensure that we do not breach our contractual obligations.

### DATA PROTECTION

APL Logistics supports the goals of:

- adherence to general privacy standards and compliance with applicable privacy laws
- the promotion of the free movement of data to enable APL Logistics to conduct business operations (assuming that, in doing so, the previous goal is not compromised)

In support of these goals, APL Logistics has enacted a **Global Data Privacy Policy**, which applies to all personal data collected, processed, retained, used and/or disclosed by APL Logistics. We comply with the data protection laws applicable in the countries where we conduct business.

If you handle the personal data of others, you must:

- Act responsibly and in accordance with applicable laws and contractual obligations
- Collect, process, use and retain information only for legitimate business purposes
- Limit disclosure only to those who have a legitimate business purpose or authority to access

- Take the necessary security measure to prevent unauthorized access
- Promptly report any possible data privacy breaches

Refer to the **Global Data Privacy Policy** on the Company Intranet for additional guidance, including a description of what constitutes protected personal data.

### INTELLECTUAL PROPERTY

You should protect and respect the intellectual property rights of APL Logistics and third parties, including trademarks, service marks, patents and copyrights, among others. Employees must strictly adhere to relevant laws and regulations and take appropriate measures to safeguard the intellectual property of APL Logistics.

Third party intellectual property may only be used after we have secured the rights to use it. Third-party computer programs or software that are provided as productivity tools for employees to perform their jobs shall not be duplicated, distributed or downloaded without authorization.

## GOVERNMENTAL & POLITICAL ACTIVITIES

### PUBLIC OR GOVERNMENT REPRESENTATIVES

Offering, promising or giving a benefit to a public or government official with the intent to influence his or her official function is not only against company policy but also illegal in many countries. This includes small payments made to secure routine government actions without regard to local practices.

Payments made through a third party are also prohibited, regardless of how the payment is characterized, if there is indication or reason to believe that a government official will be the ultimate recipient.

You should exercise caution in the giving of gifts, hospitality or entertainment to government representatives. Check local laws to determine whether there is any restriction on gifts or a process of official declaration. Always follow the **Gifts, Hospitality and Entertainment Policy**.

## COMPLIANCE WITH LAWS

We comply with all applicable laws and regulations to conduct business in an ethical manner. The highest standards of conduct are required of our employees and all other persons who act on our behalf, including contractors, agents and consultants. Violations of these policies will result in disciplinary action, up to and including termination of employment. You are encouraged to ask questions and seek guidance when in doubt, and express concerns to your manager or appropriate contacts.

## INTERNATIONAL TRADE

APL Logistics is committed to complying with international trade control laws, regulations and country-specific trade sanctions affecting international transactions. This includes, but is not limited to, regulations issued by the U.S. Office of Foreign Assets Control. All employees shall comply with restrictive measures and trade sanctions adopted against certain countries, governments, organizations, individuals or assets.

## MEDIA STATEMENTS

At APL Logistics, communications play an important role in how the company is represented and perceived. When statements are made to media outlets such as television news stations, newspapers, or other publications, it is important to ensure the information provided to the public is accurate. The Corporate Communications team is responsible for setting and managing an accurate, consistent global communications policy.

All requests for information or interviews from the media must be immediately referred to the Corporate Communications team. Employees are not to respond to these requests without authorization and review from Corporate Communications.

Unless previously approved by Corporate Communications and management, you should avoid discussing any of the following topics in public:

- Financial performance information
- Market share information
- Customer information, unless approved by the customer
- Information on plans, proposals and projects in progress
- Detailed information about procedures or processes that could give competitors an advantage
- Information on past or current performance of any employee beyond confirmation that the person is currently employed by the organization
- Public criticism of competitors



# GLOBAL ETHICS HELPLINE NUMBERS

The local, toll-free numbers below are available if you want to file a report or ask questions by phone. If your country is not listed, reporting by phone is not available for your location. Please file your report online at **[www.APL Logisticsemployeehotline.ethicspoint.com](http://www.APLLogisticsemployeehotline.ethicspoint.com)**.

COUNTRY	PHONE NUMBER
Australia*	1-800-551-155 (Optus) 1-800-881-011 (Telstra)
Bahrain*	800-00-001 800-000-00 (U.S. Military Bases) 800-000-05 (Cellular)
Brazil*	0-800-890-0288 0-800-888-8288 (Cellular)
Cambodia†	704-414-5668
Canada	1-844-765-6703 1-855-350-9393 (Français)
Chile*	800-225-288 (Telmex - 800) 800-800-288 (Telefonica) 800-360-311 (ENTEL) 800-360-312 (ENTEL - Spanish Operator) 800-800-311 (Easter Island) 800-800-312 (Easter Island - Spanish Operator)
China	4006009325
Costa Rica*	0-800-011-4114 0-800-225-5288 0-800-228-8288 (Spanish Operator)
Egypt*	02-2510-0200 (Cellular) 2510-0200 (Cairo)
Germany*	0-800-225-5288
Guatemala*	999-9190 (Claro)
Honduras*	800-0123 (Spanish Operator)
Hong Kong	800-908-441
India*	000-117

COUNTRY	PHONE NUMBER
Indonesia*	001-801-10 (not available from cellular phones)
Korea	00798-14-800-6599 00308-110-480 00798-1-1-009-8084
Malaysia*	7-800-80-0011
Mexico	001-844-894-5381
Netherlands*	0800-022-9111
Pakistan*	00-800-01-001 (not available from cellular phones)
Philippines*	1010-5511-00 (PLDT - Tagalong Operator) 105-11 (Globe, Philcom, Digitel, Smart)
Saudi Arabia*	1-800-10
Singapore	800-110-2283
Sri Lanka*	2-430-430 (Colombo) 112-430-430 (Outside Colombo)
Taiwan*	00-801-102-880
Thailand	1800-011-628
Turkey*	0811-288-0001
United Arab Emirates*	8000-021 8000-555-66 (du) 8000-061 (Military-USA and Cellular)
United Kingdom	0808-234-0494
USA	1-844-765-6703
Vietnam*	1-201-0288 1-228-0288

\* When calling the number(s) listed for these countries, at the English prompt dial 1-844-765-6703.

† For Cambodia, contact your local operator, request a reverse charge or collect call to be placed to the United States at the number listed.



A member of the *KWE* Group

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