APL LOGISTICS

STATEMENT OF ETHICS

Dear colleages, customers and vendors,

I am proud to say that the APLL Group continues to evolve into the premier order management provider and an employer of choice. Year after year, thousands of our employees spread across five continents have worked together with our customers and vendors to bring the APLL Group to where it is today, and I am sure will continue to drive even greater performance in the future.

But what underpins all of this achievement is a firm and ongoing commitment to compliance with the highest ethical and legal standards. A sense of trust and responsibility between ourselves and with our customers and vendors helps us build a sustainable and stable foundation from which both our business and our employees can grow. It guards against possible legal infringements, penalties and publicity that could have a substantial negative impact on the group as a whole and on individual employees.

The APLL Corporate Code of Conduct (the "**Code**", available on our website¹) is designed to raise awareness of key ethics and legal topics and help guide employees through common challenges they may face in their day-to-day work. It describes the principles for sound decision-making by every APLL employee, but is not intended to be a comprehensive rulebook. Certain topics in the Code are supplemented by additional policies and guidelines. Where relevant, employees can follow the links in the Code, or visit the APLL intranet site, to find out more.

Each and every employee is the first line of defence against violations of law, the Code and group policies and guidelines. It is important that they read, understand and follow the Code and group policies and guidelines at all times.

We also maintain the APLL Vendor Code of Conduct ("**VCOC**", also available on our website) where we ask our vendors to commit to similar ethical and legal standards.

If anyone is unsure, or sees or suspects that any unethical or illegal behaviour has occurred, that person is expected to come forward with their concerns. The Code and the VCOC respectively provide details of who to contact and how to make a report. Reports can be made without fear of reprisal – the APLL Group prohibits retaliation against anyone who makes a report in good faith – and reports can be made anonymously.

Together with the APLL Group Board, and on behalf of our parent Kintetsu World Express, Inc., I ask each of you to live the principles set out in the Code and the VCOC in every step that you take along your journey with us to continue to make the APLL Group a success.

Thank you for your support.





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¹ https://www.apllogistics.com/business-terms Version: December 2022