



## GLOBAL POLICY

# Code of Conduct

## WHY THIS MATTERS

Our Code of Conduct is our guiding star. The principles herein are not unique to OIA Global, they are universal. They are simple and powerful. Be honest and fair in your dealings with others. Be considerate of colleagues, customers, suppliers, and the communities in which we work. Be respectful of the environment and its limited resources.

To our employees, regardless of your job, role, level of responsibility, or immediate task: read the Code of Conduct and refer to it often. To our partners, it is expected that you will also hold to the tenants outlined here. To our customers, we will strive to be an asset to your supply chain. Further, OIA Global is also committed to advancing the United Nation's Sustainable Development Goals that align with our impact on society, environment, and ethics.



# Contents

<b>CONTENTS</b>	<b>2</b>
<b>ABOUT THE CODE</b>	<b>3</b>
Does the Code of Conduct apply to me?	3
Does the Code of Conduct cover all that is expected of me?	3
How is the Code of Conduct enforced?	3
Whistleblowers	3
<b>SOCIETY</b>	<b>4</b>
Equal Employment	4
Fair Labor Standards	4
Health & Safety	5
Physical & Data Security	5
Community Engagement	5
How does this apply to our suppliers?	6
<b>ENVIRONMENT</b>	<b>7</b>
How does this apply to our suppliers?	7
<b>ETHICS</b>	<b>8</b>
Anti-Corruption	8
Sanctions, Controls & Anti-Boycott Laws	8
Anti-Trust & Fair Competition	9
Information, Data Security & Documentation Retention	9
How does this apply to our suppliers?	9



# About the Code

## **DOES THE CODE OF CONDUCT APPLY TO ME?**

The Code belongs to all of us and it applies to every employee, manager, and director worldwide. It applies to all parties contracted by and acting on behalf of OIA Global, such as service providers, vendors, and manufacturers.

Every employee is expected to familiarize themselves with our Code as well as with all our other related policies, within each area covered. All employees are expected to confirm in writing when they have read the Code and may be asked to take a short test confirming comprehension.

## **DOES THE CODE OF CONDUCT COVER ALL THAT IS EXPECTED OF ME?**

Simply, it is to do what is right. This means complying with the letter and spirit of the Code. The letter of the Code means the literal requirements of that Code provision. The spirit is the intent inspiring those requirements. Both are very important.

The best interests of OIA Global are not served by exploiting general language, technicalities, or other loopholes to comply with only the letter, but the spirit of the Code, or your local policies, procedures, laws and regulations.

## **HOW IS THE CODE OF CONDUCT ENFORCED?**

OIA Global takes all violations of the Code seriously and investigates reported violations.

OIA Global will protect the confidentiality of those who report a potential violation to the extent it can legally do so. OIA Global does not permit retaliation against anyone who files a good-faith report of a potential violation. Anyone involved in retaliation will be subject to disciplinary action, up to and including termination of employment.

## **WHISTLEBLOWERS**

Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported. OIA Global has adopted our whistleblower policy from our parent company, LDI, Ltd., for the use of an ethics hotline. Employees can reference our intranet for whistleblowing online, via phone, or by mail.

External parties can email [compliance@oiaglobal.com](mailto:compliance@oiaglobal.com).



## Our Mission

To grow as a global supply chain leader, while maintaining the qualities of a small company, placing customers first, supporting thriving employees, and offering a rewarding work environment.

## Society

### **EQUAL EMPLOYMENT**

OIA Global is committed to providing all persons an equal employment opportunity. We expect fairness and equitable treatment in hiring, promotion, and daily conduct. We believe all employees are entitled to work in an environment free of harassment and intimidation.

OIA Global is committed to providing reasonable accommodation, as appropriate, to otherwise-qualified individuals with disabilities or employees whose religious beliefs conflict with a workplace rule or policy.

OIA Global is committed to maintaining a positive work environment that is free of inappropriate conduct or discrimination. Unacceptable behaviors include sexual harassment, intimidation, or discrimination of any kind based on race, sex, sexual orientation, gender identity, gender expression, marital status, age, color, religion, creed, national origin, disability, military status or pregnancy or any other characteristic protected under applicable law.

OIA Global expects that employees will treat their colleagues with respect and demand that others do as well. Managers and directors are charged with the responsibility of setting a positive example and enforcing compliance. If you believe that you or another employee has been subjected to discrimination, you should report it.

### **FAIR LABOR STANDARDS**

OIA Global will not tolerate abuse of labor standards including any forced, bonded, or compulsory labor or employment of workers below the minimum legal age of employment.



## HEALTH & SAFETY

OIA Global is committed to providing a safe workplace for all employees including complying with all applicable health and safety laws and regulations. OIA Global will maintain office environments that maintain social distance and standards of sanitation that protect our employees from infection.

Related policies include:

- Dangerous Goods & Hazardous Materials
- Hazardous & Prohibited Commodities
- Drug & Alcohol Policy

## PHYSICAL & DATA SECURITY

OIA Global takes its role in the supply chain seriously. We will not tolerate actions that endanger the safety and security of our employees, service providers, and customers. This includes their information and data.

As a member of CT-PAT and AEO, we conduct regular reviews of our facilities to ensure compliance with these security standards, in addition to our own protocols. OIA Global conducts annual risk assessments on our routings and facilities. This is in addition to the supply chains we manage on behalf of our customers, which are in line with a Five Step Risk Assessment protocol.

Related policies include:

- Background Checks
- Global Cargo Security
- Information Technology & Cyber Security
- Known Shippers & Specially Designated Nationals List
- Known Service Providers
- Hazardous & Prohibited Commodities
- Operational Safety & Security
- Disaster & Crisis Management
- Business Continuity & Recovery
- Internet & Social Media Use
- GDPR Compliance & General Data Security

## COMMUNITY ENGAGEMENT

OIA Global is proud to support the communities we work in. We encourage all employees, managers, and directors to participate in activities that benefit our communities.



## HOW DOES THIS APPLY TO OUR SUPPLIERS?

We expect that no vendor will employ forced, child, or unpaid (slave) labor.

We expect a high standard of working conditions that supports human health, safety, and includes the free right of association and advancement. We expect that suppliers do not discriminate. We expect that suppliers maintain full and secure control of their assets, data, and facilities to protect the integrity of the supply chain.

For our managed vendors on behalf of our supply chain customers, we will conduct additional audits and report violations based on customer-specific protocols.

*OIA Global commits to these United Nations Sustainable Development Goals:*





# Environment

OIA Global is committed to measuring and reducing our own Greenhouse Gas footprint (Scope 1 & 2 emissions), limiting solid waste, and managing water consumption from our operational facilities.

We are committed to helping our customers measure, analyze and reduce their Scope 3 emissions based on the methodology included in the GLEC framework.

In our managed manufacturing operations, it is expected that our supplier base will conform to local and international standards of regulating pollution of the air, ground, and water and be willing to change processes or materials to reduce environmental impacts.

OIA Global is committed to introducing circularity in our customer's supply and value chain operations, believing that pollution or scrap represents waste.

## HOW DOES THIS APPLY TO OUR SUPPLIERS?

Our ocean freight carriers will be members of the CCWG, adhere to all regional and international regulations regarding emissions and bilge water, including adherence to IMO 2020, and have a ship recycling policy. Our air freight carriers will have an established environmental policy, follow IATA RP and become members of SAFA. Our road freight carriers are EPA SmartWay members, members of a similar organization or have an established environmental road map. Our packaging vendors manage their air, water, chemical, and solid waste.

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## Ethics

As a global company, we conduct business with integrity. We are committed to adherence to all local laws and hold ourselves to a high standard internationally. We are responsible for protecting our own assets and information, as well as the assets and information of our customers, suppliers, and business partners.

With our global headquarters in the United States, we adhere to and comply with U.S. laws and regulations first, in addition to international and regional regulations in the countries we operate in.

### ANTI-CORRUPTION

OIA Global complies with national laws and international practice. We do not participate in corrupt practices. We observe, respect, follow, and abide by the U.S. Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act, and all other applicable anti-corruption laws.

Employees may not offer, promise, or pay, or arrange for a third party to offer, promise, or pay, kickbacks, bribes, undisclosed commissions, lavish gifts, unlawful services, excessive entertainment, or anything else of value to any other person for the purpose of exerting improper influence over the recipient, with the express purpose of inducing the recipient to violate his or her duties; securing an improper advantage for OIA Global.

Offers, promises, and payments are prohibited if the employee personally make the payments with his or her own money without seeking reimbursement from OIA Global. Employees may not receive any such improper payments, gifts, or services.

Legitimate, receipted payments made to a government agency are not included as they are almost always legal and ethical. For example, a payment for customs duties paid to the official government customs agency for which you receive an official receipt or acknowledgement.

Facilitation payments, which are payments made to expedite or secure the performance of a routine, non-discretionary government action to which OIA Global is entitled, are strictly prohibited.

Likewise, employees should avoid offering, giving, or accepting any gift from any party with which OIA Global does business, except for token exchanges. Entertainment should never create the appearance of impropriety.

### SANCTIONS, CONTROLS & ANTI-BOYCOTT LAWS

OIA Global, as a U.S. based company that operates globally, complies with the sanctions and export regulations applicable to the countries in which we operate. In addition to local rules, we comply with U.S. sanction and anti-boycott regulations specific to our U.S. registration. We respect U.S. law and do not comply with economic boycotts in which the United States does not participate.





## **ANTI-TRUST & FAIR COMPETITION**

OIA Global employees, managers, and directors must comply with all applicable antitrust and competition laws. It is OIA Global's intent to avoid conduct that could be seen as an attempt to keep market forces from working.

OIA Global will never share commercially sensitive information with competitors without prior approval from the Legal Department's Compliance Group. Examples of prohibited conduct include:

- Agreeing with a competitor to fix prices
- Collaborating or coordinating with a competitor on a competitive bid
- Agreeing with a competitor to boycott another service provider
- Discussing commercially sensitive information with a competitor
- Participation in an association that encourages or promotes anti-competitive conduct

## **INFORMATION, DATA SECURITY & DOCUMENTATION RETENTION**

OIA Global takes seriously its responsibilities related to the collection, use, and management of personal and business information. OIA Global is committed to respecting the privacy of any personal data we collect, use, or process.

We apply the principles of GDPR, respecting confidential information relating to our suppliers, customers, and business partners, including non-public information used for entry or regulatory purposes. We work to guard our systems from intrusion and theft. OIA Global maintains document retention standards in accordance with customs, regulatory bodies, and customer requirements.

This includes company procedures on:

- Document retention and destruction
- Information technology and cyber security

## **HOW DOES THIS APPLY TO OUR SUPPLIERS?**

We recognize that in working as a service provider we are privy to information that is the property of our suppliers, customers, and business partners. This information carries a great deal of value or was generated at great expense. We take seriously our responsibilities related to the collection, use, and disclosure of this information.

Any information relating to OIA Global, its suppliers, customers, or other business partners that we encounter as part of our employment must be considered confidential. Particularly, information that, if disclosed, might be of use to a competitor, or harmful to our suppliers, or the supply chain.



Examples of confidential information includes, but are not limited to:

- Technical or proprietary information about cargo access
- Business and marketing plans and projections
- Information on a customer's commercial documentation
- Internal financial data
- Personal information
- Supplier and customer lists

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