



# Code of Conduct





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## A Message From the CEO

To all OIA Global employees,

Trust and service remain paramount to our organization's success. This Code of Conduct has been developed as a guideline for all employees to do what is right. The policies contained within are a statement of my personal commitment, as well as the organization's commitment, to increased transparency, inclusion and accountability.

OIA Global has evolved to become a truly unique end-to-end supply chain management provider, largely because of our passionate and innovative employees. Our continued success will depend on all employees adhering to this Code of Conduct, and reporting violations whenever they occur. I hope every employee exhibits strong character in their daily work and represents our organization in the best manner possible.

As a leader, I am constantly assessing how our employees' experiences can be improved through concrete initiatives. This is why we've introduced a third-party anonymous global hotline. Through this service, you can trust that your voice will be heard quickly and in a way that is most comfortable for you. Our organization cannot progress without you and it's imperative to remember that your wellbeing and safety will always be paramount.

Every employee has my full support and appreciation when taking steps that ensure individuals in our organization comply with the letter and spirit of our Code of Conduct. Thank you for taking the time to familiarize yourself with this document and for conducting business with the highest degree of integrity, ethics and compliance.

Together, we will continue to move forward.

A handwritten signature in black ink, appearing to read "Jeff Barrie".

Jeff Barrie,  
Chief Executive Officer  
OIA Global



# Our Mission

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

## 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 all our other related policies within each of the covered areas.

### 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.

### 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. When an issue is communicated, the organization will initiate an investigation led by Human Resources. If improper conduct is identified, appropriate action will be taken.

Actions taken could include training, warnings, counseling, and even termination of employment. All employees are encouraged to participate in investigations. There will be zero tolerance for retaliation against any employee who shares concerns or reports suspected violations of the Code of Conduct.

### How can I raise a Code of Conduct question or concern?

Anyone with a question or concern can contact one of the following individuals, or the OIA Global hotline via online submission or phone. You may communicate anonymously if you wish, but it is important to provide as many facts, details, witnesses, and documents as possible. Choose the most appropriate and comfortable approach for you:

- Your supervisor or manager
- A Human Resources department representative
- [An anonymous global hotline hosted by Navex](#)



# Society

## Equal Employment

OIA Global is committed to providing employees an equal employment opportunity. Employment decisions must be based upon the needs of the company, the requirements of the job, and the qualifications of the individual. Fairness and equitable treatment in hiring, promotion, and daily interaction is expected.

OIA Global has a diverse global workforce. The organization is committed to increasing the diversity of our workforce and showing an openness and receptivity to a variety of different perspectives, experiences and backgrounds, in addition to providing reasonable accommodations for those differences when necessary.

OIA Global is committed to maintaining a positive work environment that is free of inappropriate conduct or discrimination. OIA Global strictly prohibits discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity, gender expression, marital status, age, creed, national origin, disability, military status or pregnancy, or any other characteristic protected under applicable law. OIA Global expects employees to treat their fellow employees with respect and demands that others do as well.

## 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

Protecting employee health and safety is a core value at OIA Global and must go beyond mere compliance with laws and regulations. Our business units are expected to have strong safety and health programs that include behavioral and procedural safety, training, audits, corrective action, and reporting.

It goes against our policies and practices for any employee to work in unsafe conditions or in an unsafe manner. If you have a safety concern or a safety suggestion, please speak up!

## Physical & Data Security

OIA Global takes its role in the supply chain seriously and 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 CTPAT and AEO, OIA Global conducts regular reviews of our facilities to ensure compliance with these security standards, as well as our own protocols. OIA Global conducts annual risk assessments on our routings and facilities. This is in addition to the supply chains managed on behalf of our customers, which are in line with a Five Step Risk Assessment protocol.



### How does this apply to our suppliers?

OIA Global will not do business with suppliers employing forced, child, or unpaid labor, and expects a high standard of working conditions that support human health and safety, including the free right of association and advancement. Suppliers will be selected to 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, OIA Global conducts additional audits and reports violations based on defined 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 in our operational facilities to help customers understand, 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.

## How does this apply to our suppliers?

OIA Global believes in doing our part to transform the supply chain industry and supports initiatives that reduce emissions and enforce sustainable business practices. Our supplier network includes ocean, air, road, and rail freight carriers and raw material suppliers who meet certain industry standards. This includes, but is not limited to, the Clean Cargo Working Group, Sustainable Packaging Coalition, International Maritime Organization, International Air Transport Association, Sustainable Air Freight Alliance, Leather Working Group, and EPA SmartWay.

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# Ethics

As a global company, our board, senior management, and employees are expected to conduct business with integrity, while adhering to all local laws and upholding a high standard internationally to protect our own assets and information, as well as the assets and information of our customers, suppliers, and business partners.

With a global headquarters established in the United States, OIA Global adheres to and complies with U.S. laws and regulations, in addition to international and regional regulations in the countries where our organization operates.

## Anti-Corruption

OIA Global complies with national laws and international practice and does not participate in corrupt practices. Actions are based, observed, respected, followed, and abided 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, 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 expressed purpose of inducing the recipient to violate his or her duties; securing an improper advantage for OIA Global.

## 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 where our organization operates. In addition to local rules, OIA Global complies with U.S. sanction and anti-boycott regulations specific to U.S. registration, respects U.S. law and does 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.

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 recognizes 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 collected, used, or processed.

Applying the principles of GDPR, we respect confidential information relating to suppliers, customers, and business partners, including non-public information used for entry or regulatory purposes. Our organization works to guard proprietary and licensed systems from intrusion and theft. OIA Global maintains document retention standards in accordance with customs, regulatory bodies, and customer requirements.

### How does this apply to our suppliers?

OIA Global recognizes that in working as a service provider, our organization is privy to information that is the property of our suppliers, customers, and business partners. This information can carry significant value or be generated at great expense, and our responsibilities relate to the collection, use, and disclosure of this information.

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

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

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

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# Declaration

I acknowledge that I have read and understood the Policy and agree to abide by the terms and conditions within.

Employee Signature

Employee Name

Date