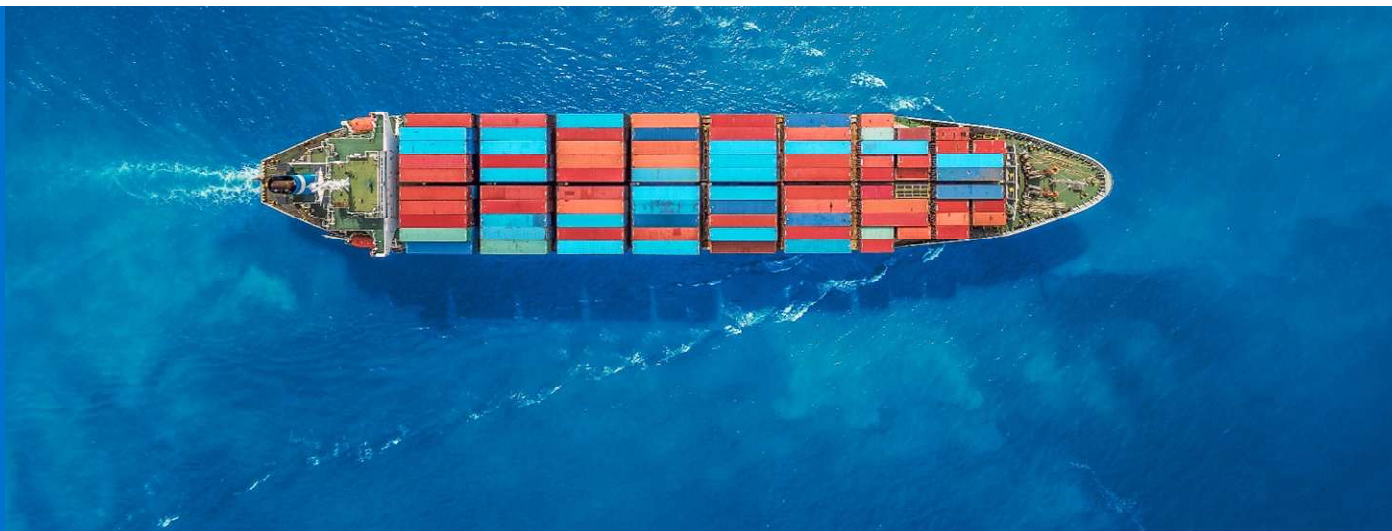




Code of Conduct

OIA Global

APRIL 2026



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 transparency, inclusion, and accountability.

OIA Global has evolved to become a truly unique end-to-end supply chain management provider. Our continued success will depend on all employees adhering to this Code of Conduct, and reporting violations whenever they occur. Reports can also be made through our third-party, anonymous ethics hotline, Navex. I hope every employee exhibits strong character in their daily work and represents our organization in the best manner possible.

Every employee has my full support and appreciation when taking steps that ensure compliance 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.

Forever forward,

Jeff Barrie

Chief Executive Officer

OIA Global



Our Mission

Our mission is to deliver peace of mind. Through proven supply chain solutions and exceptional service, OIA Global goes above and beyond to find the path to success for every customer.

About the Code of Conduct

DOES THE CODE OF CONDUCT APPLY TO ME?

The Code of Conduct 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 of Conduct, as well as all our other related policies within each of the areas covered.

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 of Conduct. The letter of the Code of Conduct means the literal requirements of that Code of Conduct 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 of Conduct 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?

OIA Global is committed to a workplace where employees can raise concerns without fear of retaliation. If you believe that a violation of this Code of Conduct, company policy, or applicable law has occurred, you are encouraged



to report it immediately through one of the reporting channels listed below. 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.

Anyone with a question or concern can contact one of the following individuals:

- A supervisor or manager
- A Human Resources team representative
- A Legal team representative
- The third-party, anonymous global hotline operated by Navex:

<https://secure.ethicspoint.com/domain/media/en/gui/82016/index.html>

All reports will be handled promptly, confidentially, and in accordance with applicable laws. OIA Global will protect the confidentiality of those who report a potential violation to the extent it can legally do so. There will be zero tolerance for retaliation against any employee who, in good faith, raises a concern, reports a suspected violation, or participates in an investigation. Retaliation includes any adverse action such as termination, demotion, suspension, threats, harassment, or discrimination.

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.



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.

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.

CONFLICT OF INTEREST

OIA Global employees must act in the best interests of the company at all times and avoid situations where personal interests could conflict, or appear to conflict, with their professional duties. A conflict of interest occurs when an employee's personal, financial, or other outside interests interfere, or could reasonably be perceived to interfere, with their ability to make impartial business decisions on behalf of OIA Global.



Examples of potential conflicts include:

- Having a financial interest in, or receiving personal benefit from, a supplier, customer, or competitor.
- Engaging in outside employment or business activities that compete with OIA Global.
- Hiring, supervising, or awarding business to close relatives or personal friends without disclosure and approval.
- Accepting personal benefits in exchange for influencing a business decision.

Employees must promptly disclose any actual or potential conflict of interest to their manager or to Human Resources. Certain conflicts may be permissible if properly disclosed and approved in advance. Undisclosed conflicts may result in disciplinary action.

GIFTS AND HOSPITALITY

It is the Company's policy not to offer, give or accept gifts of significant value unless prior written authorization is received from the CPO and the gift is reported to the Company. "Significant value" can vary depending upon the location of the recipient of the gift and the Company's employees should consult with the CPO to determine values deemed to be acceptable in a geographic location where the Company does business. The practice of giving or receiving gifts even of nominal value is discouraged, but does not violate Company policy if, in the country of the recipient, the value of the gift is nominal and gift-giving is a customary practice and does not violate applicable laws or any other provision of this code. Customary marketing materials for the purposes of promoting a Company brand are not considered gifts under this policy. Offering or receiving any gift or gratuity that might be perceived to unfairly influence a business relationship must be avoided. Gifts of cash or gift cards must never be offered or received.

Business entertainment of customers and suppliers should be intended only to facilitate business goals and not give the appearance of impropriety or undue influence. Business-related entertainment expenses will only be reimbursed by the Company upon production of an appropriate receipt and confirmation that bona fide services have been performed by the service provider.

ANTI-CORRUPTION

OIA Global complies with national laws and international practices 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 must also comply with OIA Global's



Conflict of Interest and Gifts & Hospitality policies, which are integral to preventing corrupt practices and maintaining our reputation for integrity.

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 person for the purpose of exerting improper influence over the recipient, securing an improper advantage for OIA Global, or causing the recipient to violate his or her duties.

Prohibited conduct includes, but is not limited to:

- Offering or accepting gifts, hospitality, or other benefits in violation of OIA Global's Gifts & Hospitality policy.
- Providing or receiving anything of value intended to improperly influence a business decision.
- Engaging in any conduct that would create an actual or perceived conflict of interest in violation of OIA Global's Conflict of Interest policy.

Any questions or concerns regarding anti-corruption compliance, conflicts of interest, or gifts and hospitality should be directed to a manager or to Human Resources before taking any action.

SANCTIONS, CONTROLS & ANTI-BOYCOTT LAWS

OIA Global is committed to complying with all applicable export control, sanctions, and anti-boycott laws. Failure to comply can lead to serious civil and criminal penalties and may significantly impact our reputation and ability to operate globally.

1. **Restricted Parties:** OIA Global will not conduct business with individuals, companies, or organizations that are subject to applicable government restrictions or sanctions. We screen all customers, suppliers, and other business partners against relevant denied and restricted party lists issued by governmental and intergovernmental authorities.
2. **Restricted Goods:** Certain goods, technologies, and services require government authorization before they can be exported, imported, transferred, or moved in transit. In cooperation with our customers and business partners, OIA Global ensures that all required licenses and authorizations are in place before any such transactions occur.
3. **High-Risk Countries & Regions:** Some countries and regions are subject to heightened export controls, sanctions, or embargoes. OIA Global applies enhanced due diligence for all transactions involving these areas and ensures compliance with applicable laws, including relevant anti-boycott regulations.



4. **Anti-Boycott Compliance:** OIA Global complies with all applicable anti-boycott laws, including those of the United States, and any similar laws in other countries where we operate. These laws generally prohibit participating in, or supporting, foreign boycotts that are not sanctioned by the country whose laws apply. Employees must immediately report to the Human Resources team any request, instruction, or document that could be interpreted as participating in, or supporting, such a boycott.

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.

USE OF COMPANY INFORMATION AND TECHNOLOGY

OIA Global's assets, including facilities, vehicles, equipment, computer systems, software, and intellectual property, are provided to help employees perform their jobs. All employees are expected to protect company assets from loss, damage, misuse, or theft.

Company assets should be used only for legitimate business purposes. Limited personal use of communication tools or other assets is permitted if it does not interfere with work responsibilities, violate company policies, or incur significant cost to OIA Global.

Employees may not use company systems, networks, or equipment to access, store, or distribute unlawful, offensive, or inappropriate content.

RECORD KEEPING AND FINANCIAL INTEGRITY

OIA Global's books, records, and accounts must accurately and fairly reflect all transactions. Employees must never falsify or misrepresent facts on any company document, including expense reports, time sheets, shipping records, or financial entries. All records must be maintained in accordance with applicable laws, regulations, and any



applicable document retention requirements. Fraud, misstatement, or misrepresentation of any kind will not be tolerated and may result in disciplinary action up to and including termination.

SOCIAL MEDIA AND PUBLIC COMMUNICATIONS

Only authorized spokespersons may make public statements on behalf of OIA Global. This includes interactions with the media, investors, industry groups, or posts on social media that could be perceived as representing the company. Employees must not disclose confidential or proprietary information about OIA Global, its customers, suppliers, or partners on social media or other public platforms. Personal use of social media must not harm OIA Global's reputation or violate this Code.

MODERN SLAVERY, HUMAN TRAFFICKING, AND FORCED LABOR

OIA Global is committed to eliminating all forms of forced labor, human trafficking, and modern slavery in our operations and supply chains. These practices are severe human rights violations and have no place in our business or with any of our partners.

All work must be voluntary. We strictly prohibit the use of forced, bonded, indentured, or prison labor, charging workers recruitment or placement fees, retaining workers' passports or other personal identification documents, and restricting workers' freedom of movement.

OIA Global complies with all applicable laws, including the Modern Slavery Act, and expects our suppliers and service providers to meet the same standards. We require our partners to take proactive steps to prevent these practices and to ensure transparency in their operations.

Any suspected instance of forced labor, human trafficking, or modern slavery must be reported immediately through our reporting channels. Confirmed violations will result in corrective action, up to and including termination of the business relationship.

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 by 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