



Supplier Code of Conduct	
<i>Document Type</i> Code of Conduct	<i>Author</i> Director, Global Compliance

AIT Worldwide Logistics (“AIT”) strives to earn customers’ trust, passionately value co-workers, actively engage in communities, display ethical practices, and operate with high performance at a world-class level. AIT’s Supplier Code of Conduct (“the Code”) outlines what is expected from suppliers in human rights, safe work environments, ethical practices, environmental awareness, and document retention. AIT will notify suppliers of any changes or updates to the Code. Additionally, suppliers are expected to follow all applicable local and international laws and regulations in their daily operations. AIT reserves the right to audit against compliance with any or all parts of this Code and may request access to documentation or to supplier sites for audit purposes at any time. AIT also reserves the right to terminate business contracts in the event of a material breach of this Code.

Respecting Human Rights

AIT expects suppliers to operate in a manner that respects human rights and avoids any human rights violations. The rights and principles defined within the *International Bill of Human Rights* and the *International Labor Organization’s Declaration of Fundamental Principles and Rights at Work* represent the minimum expectations deemed acceptable by AIT. In the event a human rights violation occurs, suppliers must address and resolve these violations. AIT reserves the right to terminate business relationships with any supplier that fails to address and resolve in a timely manner any human rights violation that they have knowingly caused or contributed to through their business activities.

Forced Labor

AIT expects suppliers to only employ workers who have voluntarily offered themselves for service and may not use of forced or compulsory labor. Suppliers are required to uphold a zero tolerance approach to slavery and human trafficking, and be committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within AIT’s supply chain.

Child Labor

Suppliers will not utilize child labor, defined by local and international laws and regulations, and are committed to ensuring that child labor is not used within AIT’s supply chain. Suppliers are not discouraged from using student workers or interns as long as the work is not likely to be harmful to the individual’s health and development and does not deter their attendance at school.

Wages

AIT expects suppliers to pay wages meeting the minimum rate required by law at all business locations in legal tender without discrimination.

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Anti-Harassment and Discrimination

Suppliers are expected to promote equality and diversity in the workplace. Suppliers must ensure the work environment is free of discrimination, sexual harassment, sexual abuse, physical punishment, mental/physical coercion, abusive language, unreasonable restriction, and brutal or inhumane treatment.

Providing a Safe Work Environment

AIT expects Suppliers to take adequate steps to ensure occupational health and safety that conform to local and international requirements. Suppliers and their employees who handle hazardous material must have all required training and certifications.

Engaging in Ethical Practices

i. Anti-Bribery

Suppliers will comply with the Foreign Corrupt Practices Act (FCPA), the U.K. Anti-Bribery Act, and any additional anti-bribery laws applicable to any countries in which they operate. Suppliers must not cause AIT or its customers to be in violation of the FCPA or any other applicable anti-bribery laws. Suppliers are not permitted to offer, promise, give, or demand a bribe (or any other undue advantage) for the purpose of obtaining/retaining business or improper advantage. Suppliers should also resist the solicitation of bribes or extortion. Suppliers must immediately notify AIT if the supplier becomes aware of any past, current, or future acts resulting in an actual or potential conflict with the FCPA, Anti-Bribery Act, or other applicable anti-bribery laws.

ii. Sanctioned Entities

Suppliers will not perform any services for or with any United States sanctioned persons or companies on behalf of AIT or its customers. As a U.S.-based company, AIT is required to ensure that sanctioned persons and companies are not involved in any aspect of the supply chain.

iii. Information Disclosure

Suppliers will disclose accurate information on the status of labor and safety practices, business activities, corporate governance, financial status, and performance according to local laws and industry practices.

iv. Fair Trade, Advertising, and Competition

Suppliers will comply with all applicable local and international laws and regulations regarding Antitrust and Fair Trade (prohibition of collusion), advertising, and business competition.

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v. Protection of Identity and Non-Retaliation

Suppliers, unless prohibited by local law, will provide employees with an anonymous reporting process to alert the supplier of any violations against laws, regulations, or policies. Suppliers are expected to practice non-retaliation against reporting employees.

vi. Personal Information Security

Suppliers will protect the personal information of all parties, including, but not limited to: suppliers, clients, customers, consumers, vendors, carriers, and employees. Suppliers must follow all laws concerning the collection, storing, processing, transmitting, or sharing of personal information. When operating within the European Union (EU), suppliers must comply with the General Data Protection Regulation (GDPR).

vii. Illicit Trade

Suppliers must (1) not knowingly engage in or support illicit trade, (2) implement effective controls to prevent illicit trade, and (3) collaborate with any official investigating into illicit trade in an active and constructive way. Illicit trade of products includes counterfeit or fake products, products evading local tax, smuggled products, and other illegal goods.

Environmental Stewardship

Suppliers are expected to actively manage environmental risks and to employ appropriate policies and procedures to manage risks where necessary. At a minimum, it is understood that suppliers will take measures to protect both the environment and the public well-being within the framework of local laws, regulations and practices, as well as international agreements, principles, and objectives, in alignment with the UN Human Rights Council clean environment resolution. This expectation extends to management of emissions, such that suppliers are tracking, to the best of their ability, direct and indirect emissions associated with their core business operations.

Documentation and Record Retention

Suppliers will maintain all documents and records in accordance with industry standards and in compliance with all relevant local and international law. Upon expiration of the retention period, suppliers must destroy records in a manner that complies with all applicable laws and any agreement made between the supplier and AIT.

References

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The following international standards were used while adapting this code:

1. General Data Protection Regulations
<https://gdpr-info.eu/art-1-gdpr/>
2. ILO Declaration on Fundamental Principles and Rights at Work
www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_467653.pdf
3. ILO International Labor Standards
www.ilo.org/global/standards/lang--en/index.htm
4. The International Bill of Human Rights
www.ohchr.org/documents/publications/compilation1.1en.pdf
5. OECD Guidelines for Multinational Enterprises
www.oecd.org/daf/inv/mne/48004323.pdf
6. United Nations Convention against Corruption
www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf
7. United Nations Global Compact
www.unglobalcompact.org

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