

# Supplier Code Of Conduct

Values and Principles that Lead Our  
Global Business Practice



# Foreword

Our suppliers constitute a fundamental part of Swiftships' team. Swiftships seeks to develop strategic relationships with suppliers who share and honor our values and our commitment to meet our high standards of quality, performance and integrity, while following all applicable laws, regulations, and standards of business conduct. This Supplier Code of Conduct voices the expectations we hold for our suppliers and echoes the standards we set for our entire team.

Swiftships, including, each of its divisions, business units and subsidiaries, is committed to the highest standards of ethics and business conduct. As our suppliers are a vital part of our team, we have the same expectations of our suppliers for ethics and compliance as we have for our directors, employees and representatives. This Supplier Code of Conduct (the "SCC") sets forth our expectations for each of our product and service suppliers. Suppliers are responsible for ensuring that their directors, employees, representatives, and business partners understand and comply with the expectations set forth in this SCC.

## Disclaimer

This SCC's expectations are not intended to conflict with or modify the terms and conditions of your contracts with Swiftships. If a contract requirement is more restrictive than this SCC, then you must comply with the more restrictive contract requirement.



# Local and Foreign Laws

## International Trade Compliance

We expect our suppliers to conduct business in full compliance with all applicable laws and regulations governing the: export/ import and retransfer of domestic and foreign origin parts and components and relevant technical data and services; the import of goods; economic sanctions and embargoes; and U.S. antiboycott requirements. Suppliers will provide complete and accurate information and obtain export licenses and/or authorizations whenever necessary.

## Environment, Health & Safety

We expect our suppliers to comply with all applicable environmental, health and safety laws, regulations, policies, procedures and directives. You must conduct your operations in a manner that actively manages risk, conserves natural resources, prevents pollution, safeguards the environment and minimizes waste, emissions, and energy consumption. You must also assure safe and healthy work environments for your employees and visitors.

## Substance Abuse

We expect our suppliers to ensure that their employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications. You must maintain a workplace free from illegal drugs. This includes the illegal use, possession, sale or distribution of controlled or illegal substances.

## Human Rights

We expect our suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive and ethical culture.

## **Human Trafficking**

We expect our suppliers not to engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or human trafficking. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

## **Child Labor**

We expect our suppliers to ensure the non-usage of child labor in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

## **Harassment**

We expect our suppliers to ensure that employees can perform their work in an environment free from physical, psychological and verbal harassment, intimidation or other abusive conduct.

## **Non- Discrimination**

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment without regard to race, ethnicity, religion, color, sex, pregnancy, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, any characteristic protected by state or local law, military or veteran status, citizenship status, or mental or physical disability, when the essential functions of the job can be performed with or without reasonable accommodation.



# Conflict of Interest

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their business relationship with Swiftships. You must report to Swiftships any situations/instances of potential or apparent conflicts of interest between your personal interests and the interests of Swiftships.

## Anti-Corruption

Swiftships has a zero-tolerance policy for corruption, and prohibits anyone conducting business on our behalf, including suppliers, from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes the offer and/or receipt of any bribe or kickback to and/or from any customer, supplier or others. You must never offer, promise, authorize, or provide, directly or indirectly, anything of value with the intent or effect of inducing anyone (including a Swiftships customer, employee, or higher tier or sub-tier supplier) to forego their duties and providing an unfair business advantage to Swiftships, you, or others. We expect our suppliers not to make any illegal, improper or corrupt payments. Except to the extent inconsistent with U.S. law, our suppliers must comply with the anticorruption laws that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, and other similar laws prohibiting bribery and corruption in business dealings.

## Gifts/Business Courtesies

Swiftships competes on the merits of its products and services and does not use the exchange of business courtesies to gain an unfair competitive advantage. We expect the same of our suppliers in the offering or receipt of any gift or business courtesy, including cash and cash equivalents. In particular, note that our employees who are in any way involved in procurement decisions are subject to even firmer restrictions, and may not accept any business courtesies,

with the exception of very low value promotional items. In any business relationship, our suppliers must ensure that the offering or receipt of any gift or business courtesy that is permitted by law and regulation; does not violate the rules and standards of the recipient's organization; is consistent with reasonable marketplace customs; and will not adversely impact Swiftships reputation.

## **Insider Trading**

We expect our suppliers to refrain from using material, non-publicly disclosed information obtained in the course of your business relationship with Swiftships.

## **Counterfeit Parts**

We expect our suppliers to develop, implement, and maintain methods and effective processes appropriate to their products and services to minimize the risk of counterfeit parts and materials' introduction into deliverable products. Effective processes should be in place to detect counterfeit parts and materials and remove any counterfeit parts from the final products.

## **Fair Competition & Anti-Trust**

We expect our suppliers to compete strictly on the basis of the merits of their products and services. You must conduct business in accordance with all applicable antitrust or competition laws and regulations including avoiding business practices such as entry into arrangements that unlawfully prevent competition; improper exchange of competitive information; price fixing, bid rigging, or inappropriate market allocation.

## **Supplier Code of Conduct Compliance**

You will allow Swiftships and/or its representatives to assess your compliance with the expectations set forth in this code of conduct in performing work for Swiftships, including on-site inspection of facilities and review of associated books, records and other documentation. Upon request, you must provide Swiftships with additional information and certifications evidencing compliance. You must ensure that Swiftships has the right to assess your business partners'

compliance with the expectations set forth in this SCC in performing work for Swiftships, including on-site inspection of facilities and review of associated books, records and other documentation. You must ensure that your business partners will provide Swiftships upon request with additional information and certifications evidencing compliance. In the event of any wrongdoing, you will fully cooperate with any related investigation conducted by Swiftships. You will ensure that your business partners also fully cooperate if such investigation involves their performance. You (and your business partners) must correct any non-conformances identified during assessments. Swiftships does not assume any duty to monitor or ensure compliance with this SCC, and you acknowledge and agree that you are solely responsible for full compliance with this SCC by your directors, officers, employees, representatives, and business partners

## **Codes of Conduct & Sub-Tier Suppliers**

We expect our suppliers to support compliance with laws, regulations, and expectations related to or addressed expressly within the Supplier Code of Conduct. We encourage our suppliers to implement their own written code of conduct, and to flow down the principles of a code of conduct to the entities that deliver goods and services to the supplier.

## **Supplier Diversity**

As supply chain requirements vary by country, our suppliers should understand that we often have customer-directed supplier inclusion goals that may necessitate use of in-country supply channel providers both by us and our suppliers. These may additionally be defined as small business, small disadvantaged business, woman owned small business, HUBZone certified business, veteran owned small business, service-disabled veteran owned small business, small/medium size business, or aboriginal business.

## **Supply Chain Security**

We expect our suppliers to implement practices and procedures that ensure their supply chain security. You and your subcontractors who either ship directly or package goods for shipment shall participate in, or comply with all requirements of SAFE Framework security programs of the destination country (e.g. the Customs-Trade Partnership Against Terrorism (C-TPAT) Initiative of the United States Department of Homeland Security, Authorised Economic Operator ("AEO"), or similar programs).



# Protecting IP and Confidentiality

## Information Protection

We expect our suppliers to respect the legitimate proprietary rights and intellectual property rights of Swiftships and others. You must safeguard sensitive information, including confidential, proprietary and personal information. You should not use such information for any purpose other than the business purpose for which it was provided unless the owner of the information provided prior authorization.

## Compliance with Laws & Regulations

Our suppliers must, at a minimum, perform all duties and expectations in compliance with all laws and regulations applicable to the operation of their business. Suppliers must maintain full compliance with all federal, state, and when performing international business, or if the primary place of business is outside of the United States, suppliers must comply with local laws and regulations. Suppliers must comply with all flow down terms, conditions, and other provisions stated in the Swiftships purchase order.

## Government Procurement

We expect our suppliers to comply with all rules that apply to contracting with the U.S. Government. If you support a Swiftships contract with the U.S. Government, you must at all times: follow the U.S. Government's rules for competing fairly; honor restrictions applying to U.S. Government employees (e.g., receipt of gifts and employment); deliver products and services that conform to specifications, laws and regulations; adhere to government accounting and pricing requirements; claim only allowable costs; ensure the accuracy of data submitted; and comply with all other applicable U.S. Government requirements.



U.S. Federal Acquisition Regulations, similar regulations, and reporting requirements applicable internationally require government contractors to disclose to the Inspector General of the Department of Defense (or to the Inspector General of the relevant government agency holding the contract), and to the contracting officer, certain suspected violations of law.

## **International Trade Compliance**

We expect our suppliers to conduct business in full compliance with all applicable laws and regulations governing the: export/ import and retransfer of domestic and foreign origin parts and components and relevant technical data and services; the import of goods; economic sanctions and embargoes; and U.S. antiboycott requirements. Suppliers will provide complete and accurate information and obtain export licenses and/or authorizations whenever necessary.


## **Records' Accuracy**


We expect our suppliers to accurately record, maintain, and report business documentation, including but not limited to, financial accounts, quality reports, time records, expense reports, resumes and submissions to Swiftships, the customer or regulatory authorities. You must never make any entry in your books and records or alter, conceal, or destroy any document to distort any fact, circumstance, or transaction related to Swiftships business.


## **Reporting of Misconduct & Retaliation**

We expect you to provide your staff and your business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of this SCC by you or your business partners, without fear of retaliation, including opportunities for anonymous reporting. In the event that you become aware of misconduct related to Swiftships business undertaken by any Swiftships employee, any of your employees, or any employees of your business partners, we expect you to promptly notify Swiftships. Suppliers must not take any adverse action against anyone who reports conduct that he or she reasonably believes to be illegal or otherwise in violation of this SCC. It is a violation of this code to discharge, demote, suspend, threaten, harass, or subject in any way any employee to adverse treatment in connection with their employment because he or she reported conduct that he or she reasonably believed to be illegal or in violation of this code.



 +1 (985) 384-1700

 +1 (985) 380-2565

 8001 Hwy 182 East,  
Morgan City, LA 70380

 [www.swiftships.com](http://www.swiftships.com)

For questions or concerns about this Supplier Code of Conduct please feel free to contact xxxxxxxxxxxx