

Supplier Code of Conduct

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Ascent's Vision and Guiding Principles

Our vision is to make Ascent Global Logistics, Inc., and affiliated companies ("Ascent") a world-leading, sustainable logistics service provider.



This Supplier Code of Conduct ("Code") applies to companies, individuals, consultants, and contractors (including their agents, subcontractors, or employees) that provide goods or services to Ascent (collectively referred to herein as "Suppliers"). This Code is to promote ethical business conduct in a responsible and sustainable manner. We believe that our Suppliers play a crucial role in supporting our Vision and Guiding Principles. This Code sets forth the standards and expectations we have for our Suppliers. First and foremost, Suppliers must comply with all applicable laws and regulations in the countries and regions where they operate. This includes, but is not limited to, labor laws, environmental laws, and anti-corruption laws. This Code supplements any contractual obligations Suppliers may have with Ascent.

BUSINESS INTEGRITY

Commitment to Anti-Corruption / Anti-Bribery / Money Laundering / Anti-Fraud

Ascent is committed to conducting its business in accordance with applicable laws, rules and regulations and the highest standards of business conduct. In all our operations, Ascent seeks to avoid even the appearance of impropriety with respect to the actions of any of its officers, directors, employees, agents or representatives. Ascent prohibits corrupt payments in all circumstances, whether in dealings with government officials or individuals in the private sector.

It is the policy of Ascent to comply with all relevant Anti-Corruption laws including, but not limited to, the U.S. Foreign Corrupt Practices Act ("FCPA"). Accordingly, Ascent prohibits anyone acting on its behalf, directly or indirectly, from making or receiving improper payments. Improper payments mean receiving or paying bribes or giving, offering, or promising to give money or anything else of value to any person,

including any Government Official, to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for Ascent. A Government Official may include, but is not limited to, any officer or employee of a non-U.S. government, a public international organization, a member of a non-U.S. political party, a candidate for non-U.S. political office, any non-U.S. government department or agency thereof, or any official or employee of a non-U.S. state-owned business enterprise. The use of Ascent funds or assets for any illegal, improper, or unethical purpose is strictly prohibited.

Compliance with this Anti-Corruption Policy is required of all Suppliers. Any Supplier who violates this policy in connection with Ascent's business will be subject to termination of business relations and, where appropriate, referral of the matter to relevant law enforcement authorities. Ascent and its Suppliers shall not tolerate corruption, bribery, money laundering, embezzlement, extortion, or fraud in any form.

Any individual who has information that this policy or the related procedures may have been violated or believes he or she is being asked to pay a bribe or receive a bribe, or otherwise act in contravention of this policy shall immediately report the event to Ascent.

Conflict of Interest

Suppliers must avoid any relationship or activity that might impair, or even appear to impair, Ascent's interests. We expect our Suppliers will report any potential conflict of interest.

Here are some other ways in which conflicts of interest could arise:

- Hiring an Ascent employee while the individual remains employed at Ascent.
- Offering gifts, discounts, favors, or services to an employee of Ascent.

Disclosure of Information

Suppliers shall ensure to disclose accurate and complete information in accordance with applicable regulations. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Intellectual Property

Integral to Ascent's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. Suppliers shall not disclose confidential and nonpublic information without proper authorization. Suppliers shall not disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Ascent, its business operations, plans, financial condition, results of operations or any development plan.

Confidentiality / Confidential and Private Information

Suppliers are responsible for protecting the confidential, private, and proprietary nature of Ascent information, which must be used for Ascent's business purposes only and be used consistently, with the

confidentiality terms set forth in agreement(s) with Ascent. Suppliers must avoid discussing Ascent business in public spaces, limit access to confidential and/or private information must be kept and transferred securely and in compliance with all applicable privacy laws, regulations and/or guidelines.

Export Controls and Economic Sanctions

Suppliers shall comply with all applicable restrictions on the export, re-export, release or other transfer of goods, software, services, and technology. All applicable economic sanctions restrictions involving certain territories, entities, and individuals, including third party due diligence, and all other similar trade-related laws and regulations.

Ethical Behavior

Suppliers shall uphold the highest standards of integrity in all business interactions, including standards and applicable laws of fair business practices, advertising, fair competition and anti-trust.

Grievance Mechanisms and Non-Retaliation

Suppliers shall establish grievance mechanisms for their employees to report concerns related to safety, misconduct, or other matters, in a safe, confidential and anonymous way.

Reporting a Potential Violation of the Supplier Code of Conduct

If you have information about a violation or potential violation of this Supplier Code of Conduct, you have a responsibility to report it to Ascent. No action will be taken against the reporter as a result of reporting misconduct or raising an ethical issue in good faith. This includes reporting information about the potential misconduct of an Ascent employee. If allowable in the country where the report is lodged, the report can be made anonymously. Reporting concerns can be made anonymously via Ascent's anonymous reporting hotline by telephone at 1-800-449-4230.

HUMAN RIGHTS / SAFE WORKPLACE ENVIRONMENT

Non-Discrimination/Non-Harassment

Suppliers shall not engage in discrimination based on race, gender, religion, age, disability, sexual orientation, or any other protected category. Suppliers commit to ensuring their employees are treated with dignity and respect, and suppliers should have policies in place to prevent harassment and discrimination in the workplace.

No Child Labor

Suppliers shall not use workers who are under the age of 16 or under the applicable minimum age for the industry or jurisdiction in which we operate, whichever is the highest. Suppliers shall comply with all applicable child labor laws, rules and regulations and maintain official records relating to the employment of all workers, including verification of date of birth.

Freely Chosen Employment and Working Hours

Ascent prohibits the use of any form of slave, forced, bonded, indentured, or involuntary labor and expects its Suppliers to do the same. Engaging in human trafficking-related activities are also prohibited. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others. Suppliers shall not engage in practices relating to trafficking in persons, including:

- Destroying or otherwise denying access to someone's identity or immigration documents;
- Using misleading or fraudulent practices to recruit workers, such as failing to disclose key terms and conditions of employment;
- Using recruiters that do not comply with local labor laws;
- Charging employees recruitment fees;
- Failing to provide return transportation to certain individuals who are brought to a country for the purpose of working on a U.S. Government contract;
- Providing housing that fails to meet host country standards; and
- Failing to provide an employment contract or work document where required by law.

Suppliers shall not retaliate or threaten retaliation against anyone who raises a concern or who assists with an internal or governmental audit or investigation related to these expectations.

Wages and Benefits

Workers of Suppliers must be compensated fairly, in accordance with applicable minimum wage laws and industry standards.

Humane Treatment

Suppliers are expected to provide safe and healthy working conditions for their employees, in compliance with relevant occupational health and safety laws.

Freely Chosen Employment & Freedom of Movement

Suppliers shall not use any form of forced labor, including bonded labor or involuntary prison labor. Suppliers and their employment agencies shall not impose restrictions on workers' movement through the retention of bank payment cards or similar arrangements for accessing wages. Suppliers shall not impose restrictions on entering or exiting company-provided facilities, if applicable, workers' dormitories or living quarters, except when lawful and necessary for safety or security purposes.

Freedom of Association

Suppliers must respect the applicable principles of freedom of association and collective bargaining.

Recruitment Practices

Suppliers shall not require workers to pay for Suppliers' agents' or sub-agents' recruitment fees or other related fees for their employment.

Vulnerable Groups

Suppliers shall commit to protect the rights of vulnerable groups within their businesses and supply chains, particularly the rights of women, indigenous peoples, children, and migrant workers.

Diversity, Equity, and Inclusion

Ascent believes the full potential is realized when we seek out the diverse experiences and perspectives of our teammates. Ascent expects Suppliers to develop and promote inclusive cultures where diversity is valued and celebrated across all levels of the organization.

HEALTH & SAFETY

Occupational Safety

Protecting the safety of Ascent employees, Suppliers and business partners is the most important part of running our business. Suppliers must provide a safe working environment that promotes accident prevention, minimizes exposure to health risks, and complies with environmental laws, rules and regulations. Suppliers must remain in material compliance with all health and safety laws, rules and regulations applicable to the operation and use of facilities or equipment in connection with Ascent's business.

Occupational Injury and Illness

Ascent fully covers workers' compensation costs for all employees who are injured or become ill in the scope of their employment. Ascent expects all Suppliers to comply with applicable workers' compensation coverage as required by laws and regulations.

Workplace Security

Ascent is committed to maintaining a safe and secure workplace. We prohibit violent or threatening behavior by or against Ascent team members, third parties or other individuals. Prohibited activities include intimidation, bullying, stalking, physical assaults and written, spoken, or physical threats directed at a team member, third party or other individuals.

ENVIRONMENT

Responsible Stewardship

Our Suppliers are expected to conduct their business operations in ways that minimize their impact on natural resources and protect the environment. International, federal, state and local environmental laws, rules and regulations should guide all efforts aimed at minimizing the emission, generation, discharge, and disposal of hazardous materials and other waste. At minimum, our Suppliers must make decisions that

comply with all laws, rules and regulations relating to air emissions, water discharges, toxic substances, and hazardous waste disposal. Our Suppliers are also expected to implement systems and processes to help identify, manage, reduce and responsibly dispose of or recycle non-hazardous waste. Ascent will work Collaboratively with Suppliers to reduce our environmental impact in all areas of greenhouse gas emissions, other air emissions, waste, water use and pollution and land use to help preserve our environment for future generations.

Environmental Permits and Reporting

Ascent recognizes our activities have an impact on the environment and that long-term health of our business is connected to the health of our planet. We expect our Suppliers to comply with national, state and local laws where they operate, that regulate air emissions, water quality and solid and hazardous waste disposal and the prevention of spills or releases.

MANAGEMENT SYSTEMS

Supplier Commitment

Suppliers commit to developing and implementing an appropriate management system to comply with applicable law and the content of this Code. Suppliers shall be able to demonstrate compliance with this Code upon Ascent’s request and will take any action to correct non-compliance. If requested, Suppliers will complete questionnaires or participate in on-site assessment or audits.

Supply Chain Responsibility

Suppliers are encouraged to extend these principles to their own supply chains and require their suppliers to adhere to similar standards.

ACKNOWLEDGEMENT OF THE ASCENT SUPPLIER CODE OF CONDUCT

Key Ascent Suppliers must acknowledge they have read and understand the Ascent Supplier Code of Conduct. Suppliers who are deemed to present a higher potential risk may be asked to certify compliance with this document on a periodic basis. Failure to adhere to this Code may result in immediate termination of Supplier’s business relationship with Ascent. Suppliers with questions on this Code should direct them to their Ascent business contact or a member of the Ascent Leadership Team.

Name of Authorized Signatory	
Signature	
Title / Position	
Company	
Date	