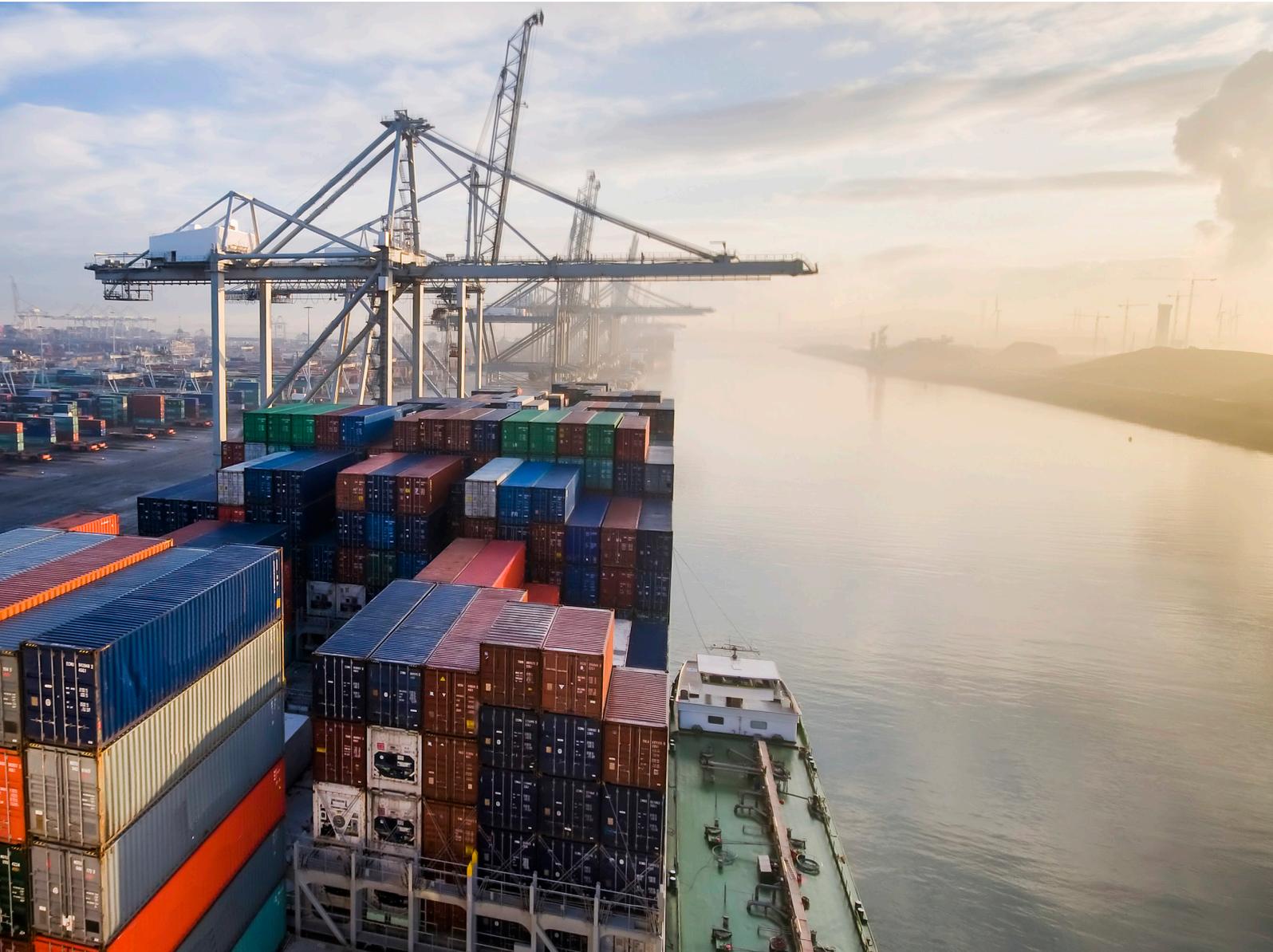


Supplier Code of Conduct

Date of last review/update December 2023



Supplier Code of Conduct

Introduction

Vanguard Logistics is committed to the highest standards of ethical behavior and social and environmental responsibility. We expect our suppliers to adhere to the same standards in their business activities and to have their own policies and processes to address issues. In addition, we expect our suppliers to hold their suppliers to these standards. Therefore, Vanguard Logistics has established a Supplier Code of Conduct (the "Code of Conduct"), which outlines the standards expected of any supplier doing business with Vanguard Logistics.

Our Guiding Principles

The Code reflects Vanguard Logistics's values and sets forth what is required and expected of its Suppliers with respect to the following topics:

1. Obey the law
2. Conduct business with integrity
3. Keep accurate and honest records
4. Honor business obligations
5. Treat people with dignity and respect
6. Protect Vanguard Logistics 's information, assets, and interests
7. Be a responsible global citizen

Obey the law

As a responsible company, we expect our global Supplier Partners to share our commitment to following the law.

We expect our Supplier Partners to:

- Know and follow the laws that apply to them and their business
- Treat legal requirements as a minimum standard
- Alert Vanguard Logistics to any material issues with the goods and services they supply—especially health and safety issues. This helps Vanguard Logistics comply with global regulations.

Conduct business with integrity

We seek business relationships based on trust, transparency, and mutual accountability.

We expect our Supplier Partners to:

- Compete fairly and ethically for Vanguard Logistics 's business
- Never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with Vanguard Logistics 's business
- Avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate
- Work with their own suppliers to promote business conduct consistent with the principles in this Code.

Keep accurate and honest records

We expect our Supplier Partners to maintain accurate and honest records. This helps us make responsible business decisions and disclose truthful and timely information to our stakeholders.

We expect our Supplier Partners to:

- Maintain books and records that reflect all transactions in an accurate, honest, and timely way
- Employ appropriate quality audit and compliance processes for matters such as worker health and safety, and labor and employment.

Honor business obligations

We work with Supplier Partners who share our desire to build productive business relationships. This requires honest communications, mutual respect, and delivering on commitments.

We expect our Supplier Partners to:

- Share our commitment to conducting business honestly and transparently
- Honor business obligations and manage unanticipated events in a proactive, timely, and open way.

Treat people with dignity and respect

We expect our Supplier Partners to stand with us in prioritizing the safety, well-being, and dignity of all individuals whose talents and hard work help us deliver our services.

We expect our Supplier Partners to:

- Provide safe and healthy working conditions at all of their operations
- Never use or tolerate the use of human trafficking, forced labor, or child labor as defined by the International Labour Organization (ILO).
- Foster an inclusive work environment that is free of harassment and discrimination
- Respect employees' rights to organize and bargain collectively
- Meet or exceed all legal requirements for compensation and working conditions.

Protect Vanguard Logistics 's information, assets, and interests

We expect our Supplier Partners to protect Vanguard Logistics 's reputation and any information or property we entrust to them.

We expect our Supplier Partners to:

- Comply with all applicable privacy, data protection and information security laws and regulatory and judicial requirements relating to the collection, storage, processing, transmission or disclosure of Vanguard Logistics data.
- Protect any of Vanguard Logistics 's confidential information to which they have access, including its intellectual property, trade secrets, or financial information
- Safeguard any property belonging to Vanguard Logistics while under their control
- Avoid any situations that may adversely affect our business interests or reputation
- Promptly notify us of any security incidents, actual or potential, that affect or may affect Vanguard Logistics' information, systems or assets
- Ensure that no public communications are made about Vanguard Logistics' relationship and/or business dealings with you unless we have given appropriate prior written consent.

Be a responsible global citizen

We count on our Supplier Partners to help Vanguard Logistics move goods around the world in a safe, responsible and sustainable way.

We expect our Supplier Partners to:

- Strive to reduce environmental impact through efforts such as ending deforestation, minimizing greenhouse gas emissions and waste, and using resources efficiently

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- Protect water resources by minimizing use of water in their operations, avoiding contamination from their operations, and reducing the impact on the water resources of the surrounding communities
- Respect the principle of free, prior, and informed consent concerning the resources and tenure rights of indigenous communities
- Work with Vanguard Logistics to implement sustainable processes and correct problems to drive continuous improvement and societal value.

Our goal of trusted partnership

It is our goal to build trust-based relationships with ethical Supplier Partners who follow these seven Guiding Principles. We expect our Supplier Partners to cooperate with our reasonable requests for information, certifications, and/or audit access. When there is a concern, our practice is to work with the Supplier Partner. We may be able to help identify possible improvements. However, when an issue can't be corrected or a supplier partner is unwilling to engage, we reserve the right to end our relationship.

By working closely with our Supplier Partners, we believe we can achieve mutual success while helping communities and the wider world thrive.

If you see or suspect any conduct or business practices that you think could violate our Supplier Code, please contact Vanguard Logistics directly. You may raise a concern or get help by contacting your Vanguard Logistics representative; or send an email to: wearevanguard.code@vanguardlogistics.com

Getting in touch with us quickly helps to prevent problems and correct any that have already occurred. We handle all reports promptly, fairly, and as confidentially as possible.

December 2023