



Sexual and Discriminatory Harassment Policy

May 2026

This document was approved by Hudson Shipping Lines' Board of Directors and is publicly available on our website. All employees are informed about the contents of this document.

Sexual and Discriminatory Harassment Policy

1. Policy Statement

Hudson Shipping Lines Incorporated, its branches and its wholly owned subsidiaries (collectively, the “Company” or “Hudson”) is committed to maintaining a work environment free from unlawful discrimination, Sexual Harassment, Discriminatory Harassment and retaliation. The Company prohibits such conduct by or against employees, applicants and other persons covered by this Policy, whether it occurs in the workplace or through work-related communications or activities. Conduct may violate this Policy even if it does not rise to the level of unlawful harassment under applicable law. The Company will take reasonable steps to prevent, report, investigate and correct prohibited conduct. Managers and supervisors must promptly report suspected violations as provided in Section 4 and must not attempt to investigate them independently.

2. Applicability

This Policy applies to all directors, officers, employees, applicants, interns and temporary workers and, to the extent within the Company’s control, contractors, consultants, vendors, customers, visitors and other third parties. It applies at Company offices and facilities, on business travel, at vessels, ports, terminals, customer or supplier locations, at Company-sponsored events, while working remotely and in work-related communications, including email, text messages, messaging applications and social media. This Policy applies to Company operations worldwide. Where applicable local law provides greater protection or requires different procedures, the Company will comply with that law. Violations may result in corrective action, up to and including termination of employment or the applicable business relationship.

3. Prohibited Conduct

A. Definitions.

- **Discriminatory Harassment** - unwelcome verbal, visual, written, electronic or physical conduct based on an individual’s actual or perceived race, color, religion or creed, sex, pregnancy, childbirth or related medical condition, sexual orientation, gender identity or expression, national origin or ancestry, age, disability, genetic information, marital or family status, military or veteran status, citizenship or work authorization status, or any other status protected by applicable law or Company policy, when the conduct creates an intimidating, hostile or offensive work environment, unreasonably interferes with work, adversely affects employment opportunities, or otherwise violates applicable law or this Policy.

- **Sexual Harassment** - unwelcome sexual advances, requests for sexual favors, or other verbal, visual, written, electronic or physical conduct of a sexual nature when (i) submission to such conduct is made explicitly or implicitly a term or condition of employment; (ii) submission to or rejection of such conduct is used as the basis for an employment decision; or (iii) the conduct has the purpose or effect of unreasonably interfering with work or creating an intimidating, hostile or offensive working environment. Sexual Harassment may occur between persons of any sex or gender and does not require sexual desire or intent.
- **Examples** - depending on the circumstances, prohibited conduct may include slurs, epithets, derogatory jokes or comments; offensive images, messages or gestures; unwelcome touching; repeated unwelcome requests for dates; sexual propositions; comments about a person's body or sexual activity; displaying or transmitting sexual material; threats or promises tied to employment; and harassment through electronic communications or social media.

B. Prohibited Harassment: Persons covered by this Policy must not engage in Sexual Harassment or Discriminatory Harassment. The Company will evaluate conduct in context from the perspective of a reasonable person in the position of the person affected. Intent is not determinative. A single serious incident or repeated less serious conduct may violate this Policy.

C. Retaliation: Retaliation against anyone for making a good-faith report, opposing conduct reasonably believed to violate this Policy, participating in an investigation or proceeding, or exercising rights under applicable law is prohibited. Retaliation includes any action that might discourage a reasonable person from reporting or participating, including threats, intimidation, adverse schedule or assignment changes, exclusion, discipline or other adverse treatment.

4. Reporting Sexual or Discriminatory Harassment

Any employee or applicant who believes they have experienced or witnessed conduct that may violate this Policy should report it promptly. Employees who learn of such conduct are expected to report it. Managers and supervisors who receive a report or observe or otherwise become aware of possible prohibited conduct must immediately notify Human Resources or the Legal Department, even if the affected person asks that no action be taken. Reports may be made orally or in writing to any supervisor or manager, Human Resources, the Legal Department, the General Counsel, or by email to EthicsHelp@hudsonshipping.com. No person is required to report to someone involved in the concern or to confront the alleged offender. If a concern involves anyone in a reporting channel, another channel should be used. Good-faith reports are protected even if they are not substantiated. Knowingly false or malicious reports may result in disciplinary action.

5. Policy Publication and Training

The Company will communicate this Policy to employees and make it available through the Company's intranet or other accessible means. New employees will receive the Policy as part of onboarding. The Company will provide harassment-prevention training as required by applicable law, including annual sexual harassment prevention training for employees working in Illinois. Employees are expected to participate in required training.

6. Investigation of Reports

The Company will promptly and impartially review reports and, when appropriate, conduct a thorough investigation by qualified internal or external personnel. The Company may take interim measures to protect participants and the workplace while a review or investigation is pending. Information will be shared only with persons who need it for the investigation, response or the Company's legal obligations; complete confidentiality cannot be guaranteed. All persons covered by this Policy must cooperate honestly and preserve relevant information. If a violation is found, the Company will take prompt corrective action proportionate to the circumstances, up to and including termination of employment or the applicable business relationship. The Company will advise the reporting and responding parties, as appropriate and consistent with privacy considerations, when the review has been completed.

7. External Reporting and Other Rights

Nothing in this Policy prevents any person from reporting possible discrimination, harassment or retaliation to, filing a charge or complaint with, or communicating or cooperating with any governmental agency or authority, including the U.S. Equal Employment Opportunity Commission, the Illinois Department of Human Rights or another applicable federal, state, local or foreign authority. No prior internal report or Company authorization is required. This Policy does not limit any rights or remedies available under applicable law.

8. Roles and Responsibilities

All persons covered by this Policy are responsible for maintaining a professional work environment, complying with this Policy, participating in required training and reporting concerns as provided above. Managers and supervisors have an additional duty to promptly forward all reports and known or suspected violations to Human Resources or the Legal Department, to avoid retaliation, and not to promise complete confidentiality or conduct their own investigation. Human Resources and the Legal Department are responsible for coordinating appropriate review, investigation, corrective action and training.

9. Policy Review

This Policy shall be reviewed by Hudson's Board of Directors and Corporate Social Responsibility team at least annually. More frequent reviews will take place in response to material organizational or legal changes. Approved changes will be communicated to affected personnel and incorporated into training and related procedures, as appropriate.

Next scheduled review: May 2027

10. Acknowledgements

Read and approved by:
Board of Directors
Hudson Shipping Lines Incorporated
May 2026

By signing below, the employee acknowledges receipt of this Policy, confirms that the employee has read and understands it, knows how to report concerns, and agrees to comply with its requirements.

[Date: _____]
Read and Approved
Employee [Name:

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This Policy may be amended from time to time with or without notice by the Company.