

ATLANTIC GATE

SUPPLIER CODE OF CONDUCT

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1 INTRODUCTION

At Atlantic Gate, we deliver cargo effectively and efficiently to almost any location worldwide. We earn our reputation and trust by conducting business fairly and ethically. The [Atlantic Gate Code of Business Conduct](#) reflects this commitment and sets forth the common standards of approved behavior that should guide Atlantic Gate's conduct in all its activities worldwide.

Atlantic Gate strives to set high ethical expectations for best practices across its supply and value chains. Atlantic Gate expects its suppliers, subcontractors, business partners, and any third party acting on Atlantic Gate's behalf, providing services or doing business with Atlantic Gate ("Suppliers") to:

- comply with all applicable laws and sector-specific regulations, and
- apply international standards of responsible business conduct, including the [Atlantic Code of Business Conduct](#), and operate in accordance with the following principles, which constitute the Atlantic Gate Supplier Code of Conduct ("Atlantic Gate Supplier Code"), as amended from time to time.

Suppliers are also required to ensure that their employees and all direct or indirect subcontractors and agents acknowledge and adhere to the principles and expectations specified in the Atlantic Gate Supplier Code.

To ensure that Suppliers comply with the Atlantic Gate Supplier Code, Atlantic Gate reserves the right to undertake appropriate verification either directly or through third parties appointed by Atlantic Gate. To enable such verification, Suppliers shall, upon reasonable notice, make any information demonstrating their compliance available to Atlantic Gate.

All terms not defined herein shall have the meaning found under the Atlantic Gate Code of Business Conduct.

2 HUMAN RIGHTS AND LABOUR STANDARDS

2.1 Non-Discrimination

Build a culture where all employees are treated with respect, fairness, and dignity. Ensure to have and maintain policies, procedures and/or processes that promote a working environment free from harassment, including sexual harassment and discrimination. Have processes and/or measures in place to ensure the identification, assessment, and management of risks related to vulnerable categories of workers.

2.2 Diversity and Inclusion

Commit to support diversity and promote equal employment opportunities by ensuring that all aspects of hiring and employment practices are based on merit and work-related abilities.

2.3 Freedom of Association

Recognize the freedom of association of all employees and their rights to join or not to join and form trade unions, conduct trade unions' activities and bargain collectively, without fear of discrimination, intimidation, or reprisal, in compliance with applicable local laws and regulations. In any event, employees shall be granted the ability to engage in dialogue with the management or those otherwise in charge, through established mechanisms, on issues of concern, including issues related to occupational health and safety matters, grievances, and working conditions/terms of employment, and other relevant issues.

2.4 Forced Labour

Prohibit forced and compulsory/involuntary labor, the use of prison labor, and any forms of slavery or servitude, including bonded labor and human trafficking.

Comply with all applicable anti-slavery and human trafficking laws, statutes, and regulations in force.

2.5 Working Conditions, Remuneration and Compensation

Ensure compliance with all applicable laws and the [Fundamental Conventions](#) of the International Labour Organization (ILO) relating to minimum wages, legally mandated benefits, number of working hours, and adequate rest period, as established by [ILO's mandatory standards](#).

2.6 Child Labour

Prohibit the use of child labour and, in the absence of applicable national law, adhere to relevant applicable international standards on the subject matter.

For the avoidance of doubt, child labour is intended as a work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. This includes "night work" as defined in accordance with applicable national law and practices. For instance, the minimum age for work shall not be under 15 years old, the age for finishing compulsory schooling, or the national legal working age. Hazardous work is not permitted under the age of 18 years old.

3 HEALTH AND SAFETY

Follow all applicable laws and international standards to provide healthy and safe working conditions to their employees to prevent and avoid accidents, injuries, or dangerous expositions to hazardous materials. Adopt appropriate health and safety procedures and controls to detect, manage, and avoid health and safety risks in their workplace.

4 ENVIRONMENT

Respect the environment, uphold all applicable environmental laws, and take appropriate mitigation commitments, such as emission reduction, waste reduction and management, and responsible water consumption.

Conduct operations in a manner that optimizes the use of natural resources and minimizes its impact on the environment, including on air quality, greenhouse gas emissions, or water resources. More generally, continuously improve their environmental performance consistently with international standards and good practices.

5 ANTI-CORRUPTION

Foster business in a fair, responsible, and honest manner and act in accordance with the highest international anti-corruption standards (including the fight against bribery). While doing business with Atlantic Gate, the Supplier shall uphold all applicable national and international anti-corruption and anti-bribery laws and regulations, including, the Swiss Penal Code, and where applicable, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act 2010.

Refrain from soliciting, requesting, offering, promising, paying, authorizing, or accepting any payment of money or anything of value, directly or indirectly, to any Government Official (as defined in Atlantic Gate Code of Business Conduct), Atlantic Gates Employee, or any other individual in order to obtain an undue advantage or retain a business.

As exchange of gifts and corporate hospitality can also be considered as a form of bribery, it must be limited, transparent, proportionate, reasonable, bona fide, and comply with applicable local laws and regulations.

Atlantic has a zero-tolerance policy regarding facilitation payments to Government Officials for the performance of routine governmental actions. The Supplier must conduct its business under this same policy and shall promote effective practices aimed at the prevention of corruption and bribery.

6 CONFLICTS OF INTEREST

Have adequate processes to identify and prevent conflicts of interest. A conflict of interest constitutes any personal or financial interest, any business or personal relationship, prior or current employment, or any obligation that may interfere with the ability to objectively perform professional duties or affect objectivity ("Conflict of Interest").

A Conflict of Interest can include personal and direct interests as well as those of family members or other closely related persons (for example, friends, domestic partners, persons living in the same household, or associates), partnerships, participation, or an investment in business partners or competitors.

Immediately disclose any actual or potential Conflict of Interest related to their activities with Atlantic Gate.

7 SANCTIONS REGULATIONS

Adhere to economic sanctions regulations imposed by national or supranational bodies or governments, which forbid or constrain the participation in trade and financial activities with regards to targeted subjects such as individuals, entities, territories, vessels, or aircraft.

The Supplier shall ensure that itself, its employees, agents, and any other subcontractors used are not listed or targeted by economic sanctions regulations and shall not cause Atlantic Gate to violate such regulations.

8 ANTITRUST

Atlantic Gate has a strict policy of competing fairly and complying with all applicable competition rules at any time, regardless of the location.

Conduct its business in full compliance with antitrust and other competition laws.

9 ANTI-MONEY LAUNDERING AND TERRORIST FINANCING

Fully abide by applicable anti-money laundering and terrorist financing laws and regulations and refrain from participating in such transactions.

10 BUSINESS AND FINANCIAL RECORDS

Maintain accurate records of all transactions related to Supplier's business with Atlantic Gate for a minimum of three years, or for a longer period of time, if required by local law.

11 CONFIDENTIAL INFORMATION, DATA PROTECTION AND PRIVACY

When doing business with Atlantic Gate, always protect Confidential Information and Personal Data received from Atlantic Gate, or its customers, by implementing adequate security measures in accordance with (1) industry recognized security practices, (2) contractual obligations, and (3) applicable laws, including data protection laws and regulations. Suppliers shall notably ensure to keep such Personal Data and Confidential Information protected from any unauthorized access, destruction, use, modification, and disclosure, through appropriate organizational and technical controls.

Confidential Information and Personal Data shall not be used for any purpose other than the business purpose for which they were provided or made available to the Supplier.

Inform Atlantic Gate immediately wherever the Supplier becomes aware of a current or potential breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Confidential Information and/or Personal Data.

12 BREACH OF THE SUPPLIER CODE OF CONDUCT

In case of non-compliance with the Atlantic Gate Supplier Code, without prejudice to any other contractual remedies that Atlantic Gate may be entitled to, Atlantic Gate reserves the right to take actions, including requesting immediate corrective actions and/or termination of any contractual or business relationship with the Supplier.

13 REPORTING NON-COMPLIANCE

Atlantic Gate expects its Suppliers to (1) have in place a reporting system to ensure that their employees and other stakeholders can raise concerns of misconduct confidentially and without fear of retaliation, and to (2) investigate them in an impartial and timely manner.

Furthermore, Atlantic Gate encourages its Suppliers to address questions or to report potential violations of the Atlantic Gate Supplier Code by sending an email to ch013-vendor.queries@atlantic-gate.com.