



CROWLEY®



CODE OF CONDUCT

For CONTRACTORS and SUPPLIERS

INTRODUCTION

Integrity means doing the right thing...

Operating with integrity and respect for all Crowley employees, customers and stakeholders has been a priority since our founding in 1892 by my grandfather, Thomas Crowley. Today, this principle shapes our decisions in everything we do, and as such, is one of our three core values.

While we operate in many parts of the world, with different cultures our core value of Integrity remains constant in all our businesses and areas of operation. It is the foundation for our other core values of Safety and High Performance. This means that we operate our businesses honestly and ethically wherever we are. We obey the law. We go beyond to protect our employees and our environment. We leverage our diversity of people and ideas. We treat everyone as we would want to be treated ourselves and we sustain our businesses and the environments where we operate.

Please take the time to read this Code and remember to always do the right thing, even when no one is watching.

Sincerely,

A handwritten signature in black ink that reads "Tom". The signature is stylized with a large, sweeping initial 'T'.

Tom Crowley Jr.



Our Purpose:

Enriching lives through innovative solutions done right.

Our Core Values:

Safety

Integrity

High Performance

Our Goals & Objectives:

Live Safety Every Day

Build Value with Our Customers

Maintain a Strong Financial Position

Technology as a Differentiator

Be a High Performance Organization



Code of Conduct for Contractors and Suppliers

GENERAL

Purpose

Crowley aspires to be an ethical and socially responsible company. This Code of Conduct for Contractors and Suppliers (“Suppliers”), summarizes Crowley’s expectations on a wide variety of important subjects and provides guidance on how to find additional resources. While Crowley understands that Suppliers are independent entities, the business practices and actions of a Supplier may, at times, affect Crowley’s image or reputation in the community.

Crowley recognizes that there are a variety of legal and cultural environments in which Suppliers operate throughout the world. This Code sets forth the basic requirements that Suppliers shall embrace and adhere to when conducting business with and/or on behalf of Crowley.

Applicability

This Code of Conduct for Contractors and Suppliers applies to all third parties, including agents, that provide goods and/or services for Crowley or any of its subsidiaries, divisions, affiliates, or agents. The Code of Conduct may be changed, altered, or modified by Crowley from time to time in its sole discretion. All parties shall read this Code at least annually and agree to comply with the requirements all times.

Core Ethical Principles

Suppliers shall be committed in the conduct of their business to the highest ethical standards, which include, but are by no means limited to, honesty, integrity, trustworthiness, respect for the unique intrinsic value of each human being, and avoidance of any actual or perceived improprieties and conflicts of interest.

Compliance with Laws

Suppliers shall operate in full compliance with the laws of their respective countries and states of incorporation and of each jurisdiction in which they operate, as well as with all other applicable laws, rules and regulations (including, but not limited to, laws on trade control, fair competition, the environment, labor and anti-corruption).

General Business Practices

Suppliers shall conduct their business interactions and activities in accordance with their obligations under their specific agreement(s) with Crowley. Unless and to the extent explicitly stated within such agreement(s), Suppliers shall conduct their activities as independent entities, and shall at no time hold themselves out as Crowley entities or entities otherwise authorized to act on behalf of, or bind, Crowley in any manner.

In addition, Suppliers shall maintain accurate business and financial records and comply with all applicable laws and regulations. When authorized by Crowley to use Crowley’s physical and intellectual assets, including premises, vessels, equipment, and information systems, Suppliers shall also protect and use such assets responsibly.

Safety, Security, Environment, and Quality

Suppliers shall comply with all applicable laws and regulations regarding safety, security, environment, and quality, as well as with Crowley’s Supplier Safety, Health and Environmental Requirements. Where such legal and regulatory requirements are less stringent than Crowley’s own, Suppliers must meet the standards outlined in Crowley’s Management System manual, which can be found on www.Crowley.com or provided upon request.

Risk Management and Insurance

Suppliers shall comply with all of Crowley's insurance requirements applicable to goods and/or services to be provided to Crowley and shall ensure the existence of such insurance at the levels prescribed by Crowley for the duration of the work or contract, whichever is longer. Safety is Crowley's #1 core value. When accidents do occur on or involve Crowley's equipment, premises, personnel, vessels, information systems, or intellectual property, Suppliers shall promptly report the accident to Crowley's on-site supervisor and Crowley's Risk Management Department at 904-610-2070 or after business hours at 904-612-1204.

APPROPRIATE CONDUCT

Harassment & Sexual Harassment

Crowley is committed to providing a work environment free from harassment of any kind. Harassment in the workplace is behavior that is unwelcome and offensive to specific individuals or groups or that unreasonably disrupts their work. Harassment can take many different forms and may include verbal or physical conduct that denigrates or shows hostility toward an individual and can reasonably be perceived as threatening, offensive, and/or insulting.

Anyone that experiences harassment or sees others being harassed should immediately:

- Tell the harasser to stop, and/or;
- Report the action to his/her Crowley representative and/or;
- Report the action to the Ethics Hotline at www.EthicsPoint.com.

Conflicts of Interest

Suppliers should avoid conflicts of interest and act in Crowley's best interest while performing work on Crowley's behalf. Conflicts of interest occur when competing loyalties could create a personal benefit at the expense of Crowley or its customers.

Conflicts of interest, whether business-related or personal, should be disclosed immediately to the Supplier's Crowley representative and/or reported to www.EthicsPoint.com.

Protection and Use of Assets

Protecting Crowley's assets is each Supplier's responsibility. This includes proprietary and confidential information of the Company stored both on paper and electronically. All assets should be used in the manner intended and not for personal benefit or the benefit of anyone other than the Company. Suppliers must appropriately safeguard physical and intangible assets against unauthorized use, disclosure, removal or loss.

Responsible Procurement

Suppliers are expected to select goods and services in a completely impartial manner based on price, quality, performance and suitability. Procurement on behalf of Crowley should be impartial and always in the best interests of Crowley and should not give any one supplier an improper advantage over another.

Communications / Media

Suppliers should immediately refer to their respective Crowley representative and/or the Crowley Communications Department all requests for information or comments received from organizations outside of Crowley

(including all media types). This includes formal and informal requests for interviews, photographs, written materials, and opinions.

Suppliers should exercise good judgment and caution when communicating in a public forum or on social media. Improper communications can easily have ramifications for Crowley stakeholders, customers and the public's opinion of Crowley. Absent express prior written consent from an authorized Crowley representative, Suppliers and their employees are never authorized to speak on Crowley's behalf on any matter, nor comment upon any matter that is the subject of, or related to, the work the Supplier is performing or has performed on Crowley's behalf.

Information Security

All contractors, agents, and suppliers of Crowley are expected to safeguard Crowley's non-public information, which includes, but is not limited to, everything from contracts and pricing information to marketing plans, financial information, technical specifications, and personal information.

Confidential and private information must be controlled at all times. Suppliers may not disclose Crowley's confidential or private (non-public) information to anyone outside Crowley, including family members, without Crowley's express written consent. Confidential and private information obtained while working for Crowley may not be used for any purpose whatsoever without Crowley's express written consent, even after the Supplier's working relationship with Crowley ends.

Suppliers must evaluate the data collected from possible data subjects and must comply with all applicable privacy laws and regulations. If any contractor, agent, or supplier processes data, they must keep personal data privacy rights in mind.

Drugs and Alcohol

Those working on behalf of, or providing goods and/or services to, Crowley must be able to think clearly and react quickly to protect their own safety, as well as that of their coworkers and customers. Contractors or Employees of Suppliers are prohibited from the use of illegal drugs, controlled substances, or alcohol, and the misuse of legitimate drugs in any form or manner, at any location or time while performing work on Crowley's behalf.

Violence, Threats, and Weapons

Crowley believes in a safe and secure work environment that is free from violence and threats. Threats, intimidation and acts of violence are not tolerated, period. Contractors and employees of Suppliers are prohibited from possessing firearms, explosives, or other weapons while acting for Crowley, whether or not they are on Crowley property. This includes firearms carried inside an individual's personal automobile parked on Crowley's premises, and parking areas utilized by both Crowley and the public, unless otherwise permitted by state or local law.

ETHICAL STANDARDS AND COMPLIANCE

Discrimination and Equal Opportunity

Crowley respects the rights and cultural differences of all individuals and is fully committed to equal employment opportunities for all. Crowley expects its Suppliers to provide equal employment opportunities to qualified individuals without regard to race, color, religion, national origin, sex (including pregnancy), sexual orientation, gender identity, age, medical condition, disability, veteran status, marital status, genetic information, or any other characteristics protected by law. This extends to

political affiliation and membership in workers' organizations, including unions. At Crowley, we are committed to maintaining a diverse workforce where all workers from different backgrounds feel welcome.

Reporting Concerns

Anyone that has concerns about actual or suspected violations of this Code or the law should immediately contact his or her Crowley representative or the Business Ethics Hotline - www.EthicsPoint.com.

Labor

Crowley respects all human rights, including labor rights, throughout its business activities, and expects the same of its Suppliers. Human trafficking, the use of child/forced labor, unsafe working conditions, and discrimination against protected classes is strictly prohibited.

At a minimum:

- **Child labor** - Suppliers shall employ only workers who meet the applicable minimum legal age. Suppliers must also comply with all other applicable child labor laws.
- **Contract labor requirements (if applicable)** - Suppliers that recruit or employ foreign contract workers shall ensure that these workers are treated fairly and on an equal basis with their local (i.e., not foreign) contract workers, in accordance with applicable law.
- **Voluntary labor - Forced labor** - Suppliers are prohibited from engaging in any form of involuntary labor of any kind, including human trafficking, prison labor, debt bondage, and the use of forced labor, whether through governments or private enterprise.

Freedom of Association and Collective Bargaining

Suppliers shall not interfere with workers who wish to lawfully and peacefully associate, organize, or bargain collectively. The decision whether or not to do so should be made solely by the workers.

Humane Treatment

Suppliers shall treat all workers with respect and dignity. Suppliers shall not use corporal punishment or any other form of physical or psychological coercion (e.g., non-physical abuse, including threats of violence, sexual harassment, screaming, or other verbal abuse).

Wages & Benefits

Suppliers shall pay wages, benefits, and overtime premiums in compliance with all applicable laws. Workers shall be paid at least the applicable minimum legal wage or a wage that meets local industry standards, whichever is greater.

Working Hours

Suppliers shall set working hours in compliance with all applicable laws. While it is understood that overtime is often required in some industries, provided that overtime is permitted by the terms of the engagement between the Supplier and Crowley, Suppliers shall carry out operations in ways that limit overtime to a level that ensures humane, safe, and productive working conditions.

Employee Records

Suppliers shall maintain employee and contract worker personnel records in accordance with all data privacy laws, where applicable.

Occupational Health and Safety

Suppliers shall comply with all applicable laws and regulations regarding working conditions and shall provide workers with a safe and healthy environment.

Safety, Security, Environment and Quality

Suppliers are expected to operate their business in a way that promotes the values and principles of sustainability, such as limiting waste, reducing emissions, identifying and quantifying areas of environmental & societal impacts, and ensuring that they are positive contributors to the communities in which they operate.

Monitoring, Enforcement, and Compliance Management

It is the responsibility of each of Crowley's Suppliers to ensure compliance with this Code and to inform its Crowley representative if a situation develops that causes, or may potentially cause, the Supplier to operate in violation of this Code. In addition to any other rights Crowley may have under its agreement with any Supplier, Crowley may request the removal from service for Crowley of any representative of the Supplier who behaves in a manner that is unlawful or inconsistent with this Code or any Crowley policy, and/or require the Supplier to implement a corrective action plan. If corrective action is advised but not taken, or at any other time, Crowley may elect to take its business elsewhere. Crowley encourages Suppliers to define and implement a policy for social accountability and to adopt or establish a management system to ensure that the requirements of this Code can be met in a consistent way.

Fraud and Theft

Fraud and theft present significant risks to Crowley and its reputation. Either may result in termination and/or criminal prosecution of those involved. Crowley treats workplace theft of assets belonging to customers and other employees the same way it treats theft of Crowley assets.

Money Laundering and Contraband

Money laundering and contraband are illegal and represent a security risk to the U.S. and other countries. Crowley does not condone, facilitate, or support contraband or money laundering in any way.

Suppliers must comply with all applicable laws (including, but not limited to, the U.S. Patriot Act), and assist in preventing illegal trade and facilitating illegal transactions that are the proceeds of crime.

Antitrust

Suppliers must be as fully committed to complying with antitrust and similar rules as with any other regulations. Failing to meet this commitment can result in severe harm to a Supplier's business and jeopardize the services provided to Crowley and its customers. Non-compliance may also result in significant harm to the individuals involved in a violation, including the possibility of imprisonment.

Providing Gifts, Favors, Meals or Entertainment to Employees

Personal gifts, entertainment, loans, or anything of value may not be accepted by Company employees from any person or organization that either does or seeks to do business with, or is a competitor of the Company, except for

occasional advertising materials of nominal value and minor entertainment and meals such as business lunches.

Anti-Bribery

Suppliers must comply with the U.S. Foreign Corrupt Practices Act (FCPA) and all other countries' anti-bribery laws, as applicable. Bribery of federal, state, or local public officials in any country is illegal and strictly prohibited. It is absolutely prohibited to give, offer or promise, directly or indirectly, anything of value to or for the benefit of any public official with the intent to influence any public act or to influence any public official to commit or aid in the commission of any act in violation of the law.

Ethics Hotline

Anyone can report suspected questionable behavior via Crowley's Ethics Hotline. The phone line and website are manned by NAVEX, a third-party company. Both are available in multiple languages. Individuals filing complaints may remain anonymous where allowed by law.

To file a report, have questions answered online, or find a toll-free number for foreign locations, please visit: www.EthicsPoint.com.

To call toll-free within the U.S., Puerto Rico, U.S. Virgin Islands or Canada, dial 1 (888) 371-4682.

Outside the U.S., dial +1 (904) 727-2699.

CROWLEY®

The Contractor and Supplier Code of Conduct is synonymous with The Vendor Code of Conduct referenced in the 2017 Code of Conduct.

QUESTION OR CONCERN? Log on to EthicsPoint at www.EthicsPoint.com or call 1-888-371-4682 or 1-904-727-2699 Outside the US and Puerto Rico.