



THE SUDDATH COMPANIES

CODE OF CONDUCT



The success of The Suddath Companies is deeply rooted in determination, hard work, collaboration and an unwavering commitment to safety, honesty and integrity.

Since our founding in 1919, there have been significant changes presented by an increasingly complex global economy, advancements in the industries we operate in and the ways in which we connect, communicate and work with one another. Throughout all those changes, one fact remains the same: Maintaining the trust we have earned and protecting our good name depends on every individual in the company taking personal responsibility for their conduct.

You're an integral part of our success, and we want to help you fully embrace and live by the values we are committed to as an organization: trust, innovation, teamwork, caring and agility. A key part of that commitment is equipping you with the information and tools you need to understand what is expected of you and how to best fulfill your important role on our team.

This Code of Conduct is an integral part of that toolkit, providing information about our responsibilities, including compliance with the law and the application of good judgment every day, in everything that we do.

While comprehensive, it can't address every possible scenario that may arise, and there may be times when you are presented with a situation that leaves you feeling unsure about what to do. We have resources to answer your questions and follow up to address any problems or concerns. We all have a shared responsibility to speak up if we feel that the Code we operate by, our policies or regulations are not being followed.

As a leader in transportation, relocation, workplace solutions and specialized logistics, we constantly seek out new ways to make positive contributions to the economy, our communities and the environment through our core business activities, social investment and philanthropic programs.

The quality of our people is a vital part of our continued success. I am proud of the work we have achieved together and look forward to continuing to operate and succeed as one team, in alignment with our Code and our company values, to make our company the best it can be.



Always remember, integrity matters.

Michael J. Brannigan

President & Chief Executive Officer,
The Suddath Companies

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OUR MISSION AND VISION

MISSION

To serve our customers, communities and each other with the highest level of care, making lives easier by delivering in moments that matter.

VISION

To set the standard for integrated solutions that move people, businesses, and products forward efficiently, reliably and responsibly.

OUR VALUES

TRUST

We earn trust through transparency, honesty, and integrity in all interactions.

We are dependable and follow through on our commitments and promises.

We take responsibility and are accountable for our actions.

We do what is right, even when no one is watching.

INNOVATION

We look for ways to continuously improve our customer and employee experience.

We solve problems through constant learning and creative thinking.

We challenge the status quo to improve how we work.

We take smart risks and learn from our mistakes.

We ensure everyone's voice and ideas are heard and considered.

OUR VALUES

TEAMWORK

We collaborate through common goals as one team.

We provide frequent, transparent communication with ongoing feedback.

We welcome constructive debate and diversity of ideas.

We encourage and support each other to ensure that each team member is successful.

We appreciate each team member, recognizing and celebrating contributions.

CARING

We show empathy in all we do with compassion and understanding.

We respect and value each other's perspectives.

We promote a safe and healthy work environment.

We support employee growth, development and well-being.

We demonstrate care for our community and environment.

OUR VALUES

AGILITY

We overcome challenges by being nimble and resilient.

We are willing to quickly accept, drive, and adapt to change.

We empower our people to make decisions.

We proactively anticipate and identify problems and opportunities.



WHAT WE DO MATTERS

WHAT WE DO MATTERS

At Suddath, we are driven by people. We hold ourselves and each other to the highest ethical standards. In our everyday interactions, we treat people fairly and honestly to create meaningful and lasting relationships.

Our corporate values of **Trust, Innovation, Teamwork, Caring** and **Agility** aren't just words.

They're embedded in our culture and the way we work. We live by these values and in doing so we positively impact our world.



OUR CODE

OUR CODE

Our Code of Conduct (the Code) demonstrates our commitment to our mission, vision, and values.

When we live by our Code, we communicate more effectively, respect one another, comply with applicable laws and regulations and compete with integrity. **Making the right choices and operating by our values and Code** creates better and safer work experiences for ourselves and for those with whom we interact.

How to Use Our Code

Consider our Code as a guide. It walks you through scenarios, requirements, business practices and procedures. Of course, our Code can't address every situation that you might encounter. If you find yourself in circumstances that aren't covered, remembering our mission, vision, and values can help you do the right thing. If you're unsure of what to do or how to act, our Code provides information and resources to lead you in the right direction.

Does the Code Apply to Me?

Yes. Our Code, as well as all of the policies and regulations referenced in the Code, apply to all of our employees, contractors, agents, suppliers, business partners and all other third parties with whom we engage directly.

What are My Responsibilities?

- Know our Code.
- Complete all required training and certifications.
- Report good-faith concerns about violations of our Code.
- Cooperate with investigations.

OUR CODE

Speak Up

We are all expected to comply with our Code, promote our speak-up culture, and use good judgment. We strive to provide a work environment which encourages employees to speak up when they witness something that does not conform to our Code or applicable laws. We also strive to create a culture in which everyone feels comfortable and safe in speaking up without fear of retribution. We do not tolerate or condone retaliation of any form.

If you have a good-faith concern about a violation of law or our Code, speak up! You can report anonymously (where permitted by law) by contacting a supervisor, Human Resources, our Compliance Department, our Compliance Helpline or Legal.

Reported concerns are investigated promptly. If there is a violation of law or our Code, we take action to correct it, which may include discipline, up to and including termination. In some cases, violations may also result in legal proceedings and penalties, including criminal prosecution.

I overheard fellow employees making plans to haul away scrap materials left behind after a customer project because they wanted to sell it. Is this ok?

No. The scrap material is not theirs to sell and doing so would be a violation of our Code. Report this concern to your supervisor, Human Resources, our Compliance Department, our Compliance Helpline, or Legal.

A photograph of four people (three women and one man) sitting around a white table in a modern office setting, engaged in a conversation. The image is overlaid with a dark blue semi-transparent filter. The man on the left is wearing a red patterned shirt. The woman next to him is wearing a black and white patterned sleeveless top. The woman across from them is wearing a dark blazer with white trim and glasses. The woman on the far right is wearing a white long-sleeved top. A pink cushion with the text 'STERN' is visible behind the man on the left.

OUR WORKPLACE

OUR WORKPLACE

We are committed to a collaborative and professional work environment in which everyone is treated with respect and dignity. We all have the right to work in an atmosphere that promotes equal opportunities and which is safe and free from violence, threats, harassment, intimidation and discrimination.

Diversity

We respect diversity in thought, practice and culture. We accomplish more when our team includes people with diverse backgrounds, talents, and ideas.

For further guidance, refer to our [Diversity and Inclusion Policy](#) and [Equal Employment Opportunity Policy](#).

Q
What if I think that I was passed up for a promotion because of my age?

A
If you believe that you were treated unfairly because of your age, discuss this matter with Human Resources, our Compliance Department, our Compliance Helpline or Legal.

OUR WORKPLACE

Drugs and Alcohol

We provide a substance-free workplace. Substance abuse, whether of alcohol or drugs, including prescription drugs, poses a serious threat to our overall safety and health by creating dangerous working conditions.

For further guidance, refer to the [Employee Handbook](#).

A fellow employee returned from lunch with bloodshot eyes and smelling of alcohol. Do I have to report this?

A Yes. We provide a substance-free work environment and this raises a potential safety concern. Immediately report your concern to your supervisor, Human Resources, our Compliance Department, our Compliance Helpline or Legal.

How does the Code apply to business events that serve alcohol outside of normal working hours?

A We promote a culture of health and well-being and encourage all employees to consider the risks and make responsible choices about whether to consume alcoholic beverages. Even though some work-related events may occur in the evenings, on weekends or otherwise outside of traditional business operating hours, you are still attending as a representative of Suddath, and exercising good judgment is equally important. Understanding that the consumption of alcohol can impair your judgment, potentially putting yourself and others at risk, is an important part of making a good personal decision and you must exercise moderation if you choose to consume.

OUR WORKPLACE

Harassment

We don't tolerate harassment of any kind, including verbal, physical, psychological or sexual.

For further guidance, refer to our [Harassment Policy](#).



Q One of my fellow employees consistently and jokingly refers to me in an insulting and disrespectful way. Could this be harassment?

A Yes. Talk to your supervisor, Human Resources, our Compliance Department, our Compliance Helpline or Legal about it.

Q What if the person harassing me is my supervisor? I am afraid that if I complain I could lose my job.

A We do not tolerate harassment or retaliation. Report this concern to Human Resources, our Compliance Department, our Compliance Helpline or Legal. Where allowed by law, you may report your concerns anonymously and we will maintain the confidentiality to the extent possible.

OUR WORKPLACE

Human Rights

We support human rights around the world. We provide reasonable working conditions and fair wages and will not use child or forced labor in any of our operations.

We don't tolerate or condone human trafficking or slavery and we expect the same from our business partners.

For further guidance, refer to our [Human Trafficking Policy](#).

Safety

We all have a shared responsibility to keep our workplace safe. Everyone needs to be familiar with and follow all safety guidelines and report unsafe conditions. If you see a hazardous condition or have a safety concern, speak up!

I suspect that the employees of one of our suppliers might be living at the supplier's office. Should I be concerned?

Yes. This might be an indication of human trafficking. Report your good-faith concern to our Compliance Department, our Compliance Helpline or Legal.

I saw a fellow employee operate a forklift in an unsafe manner. What should I do?

Immediately report the unsafe behavior to your supervisor, Human Resources, our Compliance Department, our Compliance Helpline or Legal.

OUR WORKPLACE

Workplace Violence

We don't tolerate violence, threats, intimidation or aggressive behavior. We treat and deal with any threat of violence the same as we would an act of violence.

For further guidance, refer to our [Workplace Violence Policy](#).

A fellow employee has recently become obsessed with weapons, blames everyone else in the office when things go wrong and has periodic emotional outbursts. I am concerned about my safety and the safety of others. What should I do?

Immediately report this to your supervisor, Human Resources, our Compliance Department, our Compliance Helpline or Legal so appropriate action can be taken.



WE AVOID CONFLICTS OF INTEREST

WE AVOID CONFLICTS OF INTEREST

We are committed to competing fairly and with integrity. A conflict of interest exists when our loyalties are divided between our company and the interests of another person or entity. We should avoid conflicts of interest and even situations that could appear to be a conflict of interest. If you are aware of a conflict of interest (or even a potential conflict), you must report it.

For further guidance, refer to our [Conflict of Interest Policy](#).

Antitrust and Competition

We are committed to fair competition and require strict compliance with all applicable antitrust and competition laws, regulations and policies. While antitrust laws may vary across our global locations, they are designed to combat unreasonable restraints on trade and promote fairness in the marketplace.

We should never engage in activities with customers, suppliers or competitors that unfairly limit or prevent competition or give the appearance of doing so.

For further guidance, refer to our [Antitrust and Competition Policy](#).

Q
Can I share our internal pricing model with others in the industry?

A
No. Discussing our pricing model with others in the industry could limit competition and may be illegal.

WE AVOID CONFLICTS OF INTEREST

Bribery

We are committed to complying with all anti-corruption laws, regulations, and restrictions mandated by the Foreign Corrupt Practices Act, the UK Bribery Act, the UK Criminal Finance Act and other laws that govern corrupt practices, including bribery. We take our obligations to comply seriously and conduct due diligence on our suppliers. Penalties for violating anti-corruption laws can be severe.

We don't offer or accept bribes from third parties to win business or influence business decisions anywhere in the world.

For further guidance, refer to our [Anti-Bribery and Corruption Policy](#).

A customer has assured me that we will see an increase in business if we donate to a charitable organization where the customer's president sits on the board. Can we make the donation?

A No. The requirement to make a donation in order to secure additional business is considered bribery and is strictly prohibited.

WE AVOID CONFLICTS OF INTEREST

Company Assets

We all have a duty to use company assets responsibly and for legitimate business purposes. Theft, carelessness and waste directly conflict with our corporate values and negatively impact our productivity.

Computer resources, including email and internet access, help us do our jobs. Limited and occasional personal use is acceptable, but it should not interfere with your job duties or impact the performance of our network. There is no expectation of privacy while using our computer resources. Our assets and computer resources should never be used for illegal purposes.

For further guidance, refer to our [Information Security, Protection and Usage Policy](#).

I am responsible for planning and coordinating all social activities for my child's school. May I use my work computer and my work email when I'm working on it, if I do it on my personal time?

A. No. This is an inappropriate use of our resources.

I am on the board of my homeowner's association and need to occasionally connect with my neighbors virtually. Can I use my Teams account to host a meeting if it is outside of business hours?

A. No, all business accounts and subscriptions should be reserved for official company use only.

Is it okay if I use a copy machine at the office to make a copy of a personal document?

A. Limited and occasional use of our resources for non-business purposes is okay if it does not interfere with your job duties.

WE AVOID CONFLICTS OF INTEREST

Friends and Family

It is a conflict of interest for family, friends or partners to report to you – or you to them. (However, some exceptions may be made for seasonal staffing.)

You may have a close friend or relative who works for one of our customers, suppliers or competitors, but those relationships should not influence our operations.

You should not recommend, or use your position with us to influence the use of, a supplier if you or your immediate family would receive personal benefits.

For further guidance, refer to our [Conflict of Interest Policy](#).

My spouse/partner owns a business and would like to work with us to provide services. Is this allowed?

A You cannot be a decision-maker in awarding business on our behalf to your spouse's or partner's business. The business must go through our standard supplier vetting process without input or influence from you.

WE AVOID CONFLICTS OF INTEREST

Gifts, Gratuities and Business Courtesies

We are committed to competing solely on our merits. We don't give or accept gifts, gratuities or business courtesies that could be perceived as unfair business practices that would violate law, regulation or our policies or those of our suppliers or customers.

In the right circumstances, a modest gift may be a thoughtful thank you, or a reasonably-priced meal may be an appropriate setting for a business discussion. We may give non-monetary gifts (such as branded calendars, pens, t-shirts, other novelty promotional items, cookies, etc.) to our suppliers and customers. However, take extra caution when dealing with government customers and officials because special rules may apply.

For further guidance, refer to our [Anti-Bribery and Corruption Policy](#).

Q
One of our suppliers offered me a weekend getaway for two that included round-trip airfare, hotel accommodations and tickets to a concert. Can I accept?

A
No. This lavish entertainment package could be perceived as an attempt by the supplier to impact our purchasing decisions.

Q
One of our suppliers sent me a gift card to a local restaurant. May I accept it?

A
No. A gift card is a cash equivalent and it would violate our Code for you to accept it.

WE AVOID CONFLICTS OF INTEREST

Insider Trading

We are committed to fair and open markets for publicly traded securities. In the course of business, you may learn confidential information about publicly traded companies. You are prohibited from buying or selling securities based on this information or passing it on to others who then trade.

Money Laundering

We are committed to conducting business with reputable customers and suppliers and preventing the use of our assets and resources for illegal purposes, such as money laundering. As part of our efforts to prevent money laundering and terrorist financing, we conduct due diligence on our suppliers, we get to know our customers and we comply with all applicable laws, regulations and restrictions.

For further guidance, refer to our [Global Trade Compliance Policy](#).



WE AVOID CONFLICTS OF INTEREST

Outside and Personal Business Interests

We count on your good judgment and ability to make decisions that are in our best interest. You must disclose outside employment to your manager to ensure there is no conflict of interest. Do not use our assets or information for the benefit of an outside business or a personal interest.

You shouldn't have substantial investments or obligations to one of our customers, suppliers or competitors unless they are publicly traded on a national exchange and there is no possibility for a conflict of interest.

Owning a significant interest in any business that competes with us or seeks to do business with us is a conflict of interest.

For further guidance, refer to our [Conflict of Interest Policy](#).

Trade Controls

We do business with customers and suppliers around the globe. Whether goods, technology, service or information may be exported from one country to another, or whether we may provide a third-party with goods, technology, service or information, depends on the origin and destination, the type of goods, technology, service, or information and the individuals or entities involved. We comply with all applicable international trade compliance laws that prohibit certain transactions.

For further guidance, refer to our [Global Trade Compliance Policy](#).

My spouse and I own a business and I would like to use the information and contacts that I have developed while performing my job duties at work to grow my personal business. Is this allowed?

A No, this is a conflict of interest. While employed with us, you must not engage in any activities that compete with us.

I want to work part-time as a real estate agent. Is this acceptable?

A You can work at your part-time job as long as it does not create a conflict of interest and you have discussed your part-time employment with your supervisor.



WE PROTECT INFORMATION

WE PROTECT INFORMATION

We comply with all applicable confidentiality, privacy and data protection laws. We only obtain, access and use personal information for legitimate business purposes. Personal information includes national identification numbers, medical data, contact information, email addresses, pictures, etc., if such information can be linked to an identifiable person.

Confidential and Proprietary Information

We are committed to protecting the confidentiality and privacy of our records and proprietary information. We do the same with confidential or private information of our customers and suppliers and other third parties. We handle information with integrity and adhere to the principles of individual privacy.

We respect the intellectual property rights, confidential information and privacy of third parties. Any business intelligence regarding our competitors must be gained ethically and legally. We should not gain competitive information through theft, misrepresentation or other deceptive means.

Your confidentiality obligation continues even after your engagement with us ends.

For further guidance, refer to our [Confidentiality Policy](#).

I have access to information related to a customer's growth projection for the coming year and a friend has asked for a copy of it. May I provide the information?

No. Business plans, financial information and other customer information are considered confidential and can't be shared.

WE PROTECT INFORMATION

Q Our department uses a shared printer and when I went to the printer to get the documents I printed, there was a document that contained sensitive employee information mixed in with my documents. What should I do?

A Do not look at, or share, the document that contains the sensitive employee information. Immediately provide the document to Human Resources or our Compliance Department.

Q I've been talking to a third party about a business opportunity that will require the exchange of confidential information. Do I need to have a Non-Disclosure Agreement (NDA) in place prior to exchanging information?

A Yes. We protect confidential information. Before either party discloses confidential or proprietary information, a Non-Disclosure Agreement must be signed. Please contact Legal for further guidance.



WE PROTECT INFORMATION

Information Security

We are committed to information security and hold ourselves to the highest industry standards for information security. Activities that involve our technology resources and/or access to information contained on such resources are to be used in compliance with our policies and all applicable laws and regulations.

For further guidance, refer to our [Information Security, Protection and Usage Policy](#).

I received a text message on my phone that seems to be coming from the company and contains a link. Should I open it?

As our cyber security compliance training emphasizes, hackers use increasingly sophisticated means to attempt to get individuals to click on links or open email attachments that could expose our company to risk. We all have an obligation to be vigilant about potential security risks. At the same time, open and frequent communication with all employees is an important part of our operations and supports our value of teamwork. Companywide communications and alerts sent via email come from Suddath Communications. When we use text messaging to communicate about emergencies, such as pending storms or weather-related closings, they are sent from **833 941-3019** and we regularly remind you to save that number in your contacts so you will recognize it. We also use the company intranet site, The Hub, and monitors throughout our locations to share important updates and information.

If you have any doubt about the authenticity of a message or its sender, via email or text, you should always verify it with your manager or IT before opening or clicking on any links.

WE PROTECT INFORMATION

Intellectual Property and Innovations

Our intellectual property, such as logos, service marks, blogs, marketing materials, software, new business concepts, etc. are valuable assets that give us a competitive advantage. You must disclose to us in writing any intellectual property that you create or develop while engaged with us.

For further guidance, refer to our [Intellectual Property Policy](#).

Maintain and Retain Accurate Business Records and Reports

We maintain complete and accurate business records in compliance with applicable laws and industry standards. We properly document all of our business relationships.

Retention of business records must comply with applicable laws and our document retention policy.

For further guidance, refer to our [Record Retention Policy](#).

I helped develop a software solution that has streamlined our processes. May I use the same logic to develop a similar solution that I create on my own and publish for others to use?

No. The logic and solution are our intellectual property and should not be shared or used for any purposes outside of our business operations.

I think a fellow employee is falsifying time records. What should I do?

Report your concern to your supervisor, Human Resources, our Compliance Department, our Compliance Helpline or Legal.

WE PROTECT INFORMATION

I would like to keep personal copies of the flowcharts and project checklists I developed while performing my job duties. Is this okay?

A No. The work you produce during your engagement with us belongs to us.

I am preparing a presentation and want to use the logos of some of our customers. Is that okay?

A We can use many of our customers' names or logos, but check with the marketing department to confirm that we have prior written permission and you are using the approved, most up-to-date version of the logo.

My position allows for me to work some days in the office and some days from home. Can I transport documents I'm using back and forth without violating the Code?

A All work-related physical documents and digital files stored in the cloud or on company equipment belong to the company and should be treated with the same level of care and security as you would treat all other company assets, regardless of where you are using them. Certain documents may be subject to higher levels of security and protection, and must remain within the company's facilities, so always check with your manager before removing any physical material from the office. If you are required to transport certain approved documents to be able to successfully perform your job duties, use good judgement and care to keep them secure and safe at all times and ensure they are returned to the appropriate company location at the completion of the project to comply with all necessary document retention rules.

For further guidance, see our **[Record Retention Policy](#)**.

OUR VOICE

OUR VOICE

We need a consistent voice when communicating our message and mission, vision, and values. We are committed to honest, professional and legal communications. If you have questions about our activities, performance, or plans, contact the marketing department.

Social media can help us interact with customers and third parties while also sharing our corporate mission, vision, and values. We need to be mindful of the information we post to ensure it complies with our policies, mission, vision, and values and all obligations of confidentiality.

Avoid speaking publicly on our behalf and do not give the impression that you are speaking for us in your personal communications. If you are contacted by the media for a comment on any of our business operations, refer them to our [Corporate Communications Department \(media@suddath.com\)](mailto:media@suddath.com), with team members who are authorized to speak on behalf of our company.

For further guidance, refer to our [Social Media Policy](#).

I was attending a customer event and took pictures, including pictures that had our customer's logo and several of our customer's employees in it. May I post these pictures to social media?

No. All social media posts for and on our behalf, must go through our marketing department.

I'm friends with someone who works for our local business paper, and they are interested in knowing more about a new business line we're launching. I'm really excited and proud to share it, can I talk to them about it, on or "off the record?"

No. While we love the enthusiasm of our team about new developments, all media inquiries must go through our Corporate Communications Department.



CORPORATE SOCIAL RESPONSIBILITY (CSR)

CORPORATE SOCIAL RESPONSIBILITY (CSR)



Corporate Social Responsibility (CSR) – also known globally as Environmental, Social and Governance (ESG) – helps us define who we are and how we operate as an organization. CSR and ESG commitments and activities represent several of the many ways we put our company values into action and make a meaningful, lasting difference.

We are committed to caring for the communities we operate in today while building a better tomorrow – for our teams, our customers and our local and global neighbors. We approach that commitment at the holistic level: from the organizations we support, to how we source our materials and operate our facilities and equipment, to the diverse team members we hire and the suppliers we partner with.

An important part of our CSR program involves volunteering with or contributing to many charitable and civic organizations and we encourage you to be active in causes that are important to you. Volunteer activities should not interfere with our work or create a potential conflict of interest.

Political Involvement and Contributions

We encourage and respect your right to participate in the political process. Your involvement is voluntary and must not create a conflict of interest. Do not make political contributions or statements regarding political matters on our behalf.



THE ENVIRONMENT

THE ENVIRONMENT

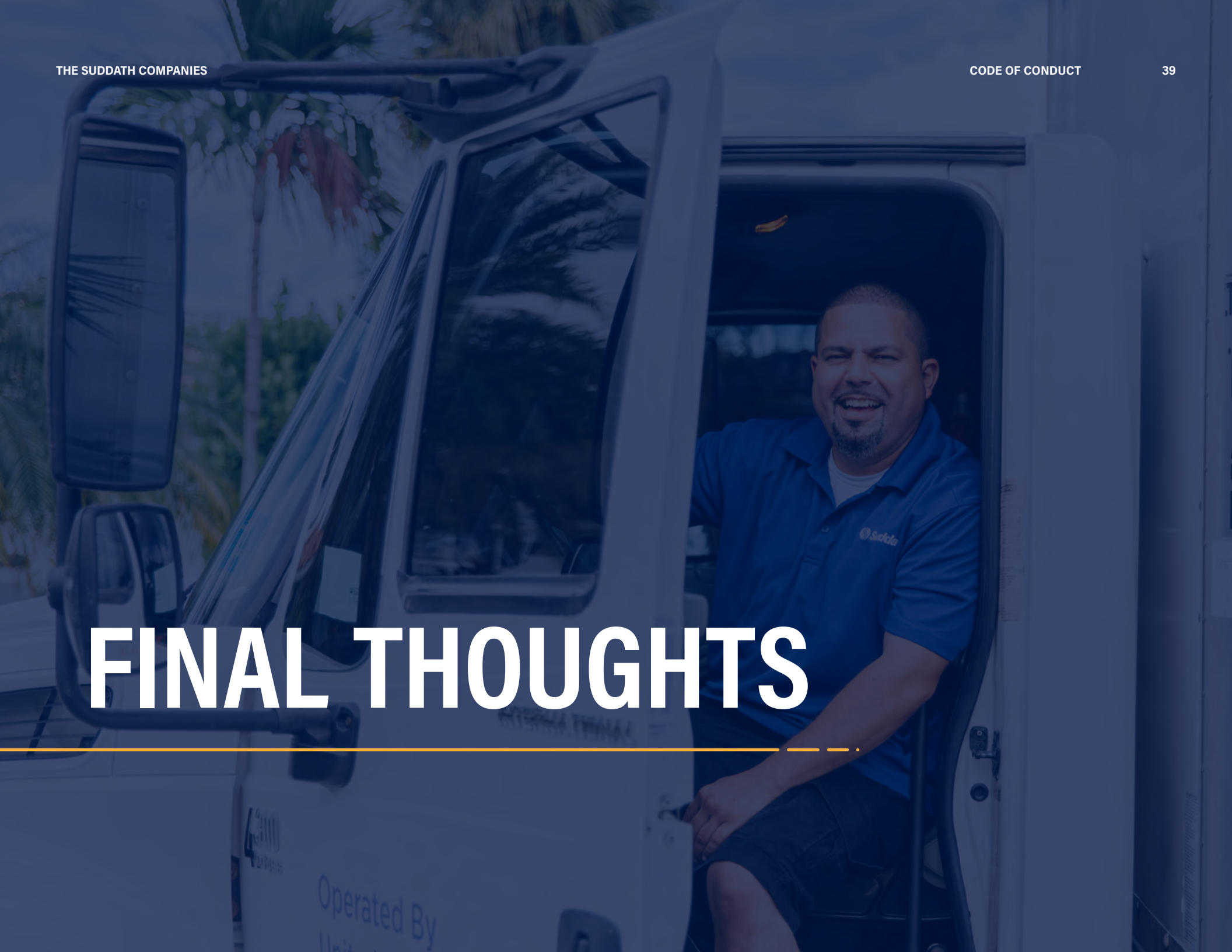
Sustainability is one of our core Corporate Social Responsibility (CSR) focus areas. We're committed to implementing sustainable practices and using systems designed to minimize the impact of our operations on the environment. You are encouraged to reduce waste, support recycling efforts and find innovative ways to protect our natural resources.

As part of our commitment to the environment, we comply with applicable laws and use proper procedures when handling hazardous materials.

Across our services and locations, we also identify ways to drive meaningful change and increase our energy efficiencies. We use eco-friendly office equipment like LED lighting and motion sensors and implement paperless practices. We reuse and recycle packing materials and crates and have idling-prevention controls in our fleet vehicles to cut down on emissions. We maintain certification in [EPA SmartWay](#), a voluntary industry collaboration to benchmark, adjust and improve fuel efficiency and reduce the environmental impact of freight transport, and work with our customers and partners to implement waste reduction practices.



FINAL THOUGHTS



FINAL THOUGHTS

Our Code can't answer all your questions or address every situation, so we've established resources to help you and provide further guidance. If you are unsure of what to do in a particular situation or have concerns that our Code, policies or regulations are not being followed, you have a responsibility to speak up. We will not retaliate against anyone for reporting a good-faith concern about actual or potential misconduct or participating in an investigation.

A fellow employee mentioned that they are hosting a watch party at their home during normal working hours and when the employee is scheduled to be working (not on PTO). Is this acceptable?

No, when working remotely, employees are expected to be available and performing their regular job duties during normal working hours. If time off is needed, the employee must request PTO or other applicable leave. You should report your concern to your supervisor, Human Resources, Compliance, or Legal.

FINAL THOUGHTS

Considerations

Sometimes you may not be sure how to handle a specific situation. If you are faced with a difficult decision, ask yourself the following questions:

- Do I have all of the facts?
- Is it legal?
- How would it look if it appeared in the media?
- Does it comply with our Code and policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I be comfortable describing my decision to others?
- Does my behavior demonstrate ethical conduct and reflect our corporate values?

If you are still unsure about the proper course of action, seek guidance from your supervisor or other members of management, Human Resources, our Compliance Department, the Compliance Helpline or Legal.

Remember, we strive to do more than simply comply with the law. We aim to do what is right, every time.

Compliance Helpline

Call Toll Free: 844.407.7265

Outside the United States, please use the following access codes prior to dialing the toll-free number:

- | | |
|-------------------------------------|-----------------------------|
| ▪ China | ▪ UK - 0-800-89-0011 |
| North - 108-888 | |
| South - 10-811 | ▪ France |
| ▪ Germany - 0-800-225-5288 | Hotels 1 - 0-800-99-1011 |
| ▪ India - 000-117 | Hotels 2 - 0-800-99-1111 |
| ▪ Singapore | Hotels 3 - 0-800-99-1211 |
| SingTel - 800-011-1111 | Hotels – Paris Only - |
| StarHub - 800-001-0001 | 0-800-99-0111 |
| ▪ Spain - 900-99-0011 | Orange - 0-800-99-0011 |
| ▪ Switzerland - 0-800-890011 | Telecom Development - |
| | 0805-701-288 |

Make a Report Online:

www.suddath.ethicspoint.com

Direct Contacts:

Compliance Department: +1 (904) 390-7120

Human Resources: +1 (904) 390-7100

Confidential, easy-to-use and always available



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