

	Category: Policies / HR / All Marken / English Title: POL-SUS-001 / Marken Code of Ethics		
Version 01	State Effective	Effective Date 25-MAR-2022	Document ID 630248

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Policy

MARKEN CODE OF ETHICS

1. Foreword

MARKEN prides itself on its integrity, honesty and fairness in all aspects of our business. We aim to create a safe, welcoming and engaging workplace for our directors, officers and employees (“**Employees**”) and encourage practices that meet our values and stakeholder commitments. We seek the same from those with whom we do business, directly and indirectly.

Marken ensures adherence to the core principles comprising our Code of Ethics throughout the entirety of our supply chain. Marken is committed to maintaining the legality and morality of our business and creating a healthy workplace. Therefore, the core principles must be recognized by and incorporated into the everyday conduct of our Employees as well as our Local Service Providers (collectively, “**LSPs**”).

As a corporation with global coverage, Marken operates in many communities around the world. As such our core principles are intended to actively pursue opportunities to strengthen our compliance with the Ten Principles of the UN Global Compact, to which Marken is a signatory.

In striving to protect and uphold the principles and values manifested in this Code of Ethics (“**Code**”), the Marken Executive Committee relies on the cooperation and integrity of all its Employees involved in Marken’s global business.

Ariette Van Strien
President

Doaa Fathallah
General Counsel and Chief Administrative Officer

2. Scope

2.1 Temporal Scope

2.1.1 Refer to ZenQMS for the effective date of this Code.

2.2 Organisational Scope

2.2.1 Marken strives to uphold this Code in everything that we do. As a means to achieve this, we ask that all Employees acknowledge that they have read and

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understand this Code through ZenQMS and continue to uphold the standards set out herein in everything that they do.

2.3 Jurisdictional Scope

2.3.1 This Code applies globally.

3. Code Responsibility and Review

- 3.1 The Marken General Counsel is responsible for this Code.
- 3.2 Managers are responsible for ensuring that Employees read this Code and that its contents are understood and Employees understand the obligations set out herein.
- 3.3 Quality Assurance shall be responsible for confirming that all Employees have read this Code annually and acknowledged their commitment to meet the Code. Human Resources shall answer any questions on content or receive feedback on the Code.
- 3.4 Complaints and reports of breaches of the Code should be lodged in accordance with *Section 6 - Concerns and Whistleblowing Procedure*.

4. Our Commitment to our Stakeholders

- 4.1 Marken recognizes our corporate responsibility to six main groups of stakeholders (“**Stakeholders**”).
- 4.2 We are committed to:
 - (a) UPS
 - (i) To build value.
 - (ii) To conduct our operations in accordance with accepted principles of good corporate governance.
 - (iii) To provide timely and accurate information to UPS on our activities and performance.
 - (b) Customers
 - (i) To win and retain customers who adhere to business principles consistent with our own, by developing and providing services that offer value in terms of price, quality, safety and environmental impact.
 - (ii) To be responsive to customer comments and complaints.
 - (c) Employees

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- (i) To respect the human rights of all Employees, whether directly employed or subcontracted, in accordance with the United Nations Universal Declaration of Human Rights.
 - (ii) To provide and maintain safe conditions of work and competitive terms and conditions of employment and contracting.
 - (iii) Not to use any form of underage or forced labour, and to act in accordance with the core International Labour Organisation Conventions. Child labour is specifically prohibited.
 - (iv) To ensure diversity and inclusion by selecting, developing and retaining Employees on the basis of ability and qualifications without any form of discrimination or prejudice.
 - (v) To ensure a safe work environment where Employees are free from any form of harassment, including sexual harassment, and having proper processes in place to ensure concerns can be raised and addressed without fear.
 - (vi) To encourage the involvement of Employees in the planning and direction of their work.
- (d) Subcontractors
- (i) To seek mutually beneficial relationships with LSPs and ensure the highest standard of work for our customers.
 - (ii) To work with LSPs who meet the ethical standards set out in the LSP Code of Ethics at Exhibit 1. LSPs with whom we conduct business will be asked to confirm their compliance with the core principles set out in the LSP Code of Ethics.
- (e) Community
- (i) To conduct business as a responsible corporate citizen, to observe the laws of the countries in which we operate, and to give proper regard to the health and safety of local communities and the environment.
 - (ii) Be sensitive to and supportive of local cultural, social, educational and economic needs.
- (f) Environment
- (i) To recognize that our business operations have environmental impacts, both in terms of the services provided and through the activities of subcontractors, with the key impact being energy use and associated emissions.

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- (ii) To appraise and seek to continuously improve environmental performance, with the aim of enhancing the sustainability of our business and that of our customers, subcontractors and the wider community.

5. Core Areas of the Code

To live up to our values and meet our commitments to Stakeholders, Marken upholds the following core ethical principles:

5.1 Health and Safety

Marken has established and manages safe and healthy working conditions for all Employees.

5.1.1 Core Principle

To refrain from any action which could threaten the health or safety of yourself, other Employees, subcontractors, customers or members of the public.

5.1.2 Policy

All Employees must make themselves familiar with and comply with the health and safety procedures contained in the *POL-HRS-021 Employee Handbook* (accessible on ZenQMS), which outline the health and safety-related duties and responsibilities of Employees and the measures Marken takes to ensure a safe and healthy working environment.

5.2 Anti-Discrimination and Equal Opportunities

Marken provides equal opportunities to all Employees and is strongly committed to the principle of equality regardless of race, religion or belief, age, nationality, sex, disability, pregnancy/maternity, gender reassignment, marital or civil partnership status, or sexual orientation.

5.2.1 Core Principle

Marken will not condone any discriminatory act or attitude in the conduct of our business. This includes unlawful harassment and victimization.

5.2.2 Policies

Marken's *POL-HRS-012 Harassment Policy* (accessible on ZenQMS) prohibits all forms of personal harassment including, but not limited to, discrimination and victimization. Marken's *POL-HRS-011 Grievance Policy* (accessible on ZenQMS) ensures that all Employees are able to address concerns, problems and complaints freely and without prejudice to their position.

Marken's *POL-HRS-014 Diversity and Inclusion Policy* (accessible on ZenQMS) sets out Marken's Diversity and Inclusion Principles and various targets and metrics used to ensure Marken achieves them.

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5.3 **Anti-Corruption, Anti-Bribery and Anti-Money Laundering**

Marken is committed to acting with honesty and integrity in everything that we do.

5.3.1 Core Principle

To ensure Marken Employees and subcontractors:

- (a) refrain from, directly or indirectly, offering to pay, solicit or accept a bribe, or any other such payment which may be construed as such, in any form;
- (b) act with honour and integrity at all times and refrain from any fraudulent or misleading behaviour by strictly complying with all applicable anti-corruption laws; and
- (c) create training programs that allow Employees to identify requests for, and report activity concerning money laundering through the Marken *POL-HRS-004 Whistle Blowing Policy* (accessible on ZenQMS).

5.3.2 Policy

Marken's *POL-HRS-001 Anti-Corruption Compliance Policy* (accessible on ZenQMS) is intended to ensure that Marken, as well as our Employees and subcontractors, fulfil this commitment and comply with any and all applicable national and international anti-bribery and anti-corruption laws and treaties.

5.4 **Fundamental Human Rights (FHRs) and International Labour Rights**

Marken recognizes its responsibility to respect and protect FHRs and International Labour Rights throughout the entirety of its business and to safeguard its global supply chain from modern slavery violations.

5.4.1 Core Principle

To protect the Fundamental Human Rights and International Labour Rights of our Employees, including the rights of children and eradication of slavery (including modern slavery).

5.4.2 Marken's Commitment

In line with its commitment to uphold the rights and principles granted by the 'International Bill of Human Rights', the 'ILO Declaration' and the UK's Modern Slavery Act and Marken's commitment to the 'UN Global Compact', Marken recognizes the need to continuously monitor its global supply chain.

Marken shall conduct annual reviews to ensure that all Employees receive wages at least in accordance with local minimum wage legislation and that none of the above rights and principles are being infringed.

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UPS's modern slavery statement can be found at:
https://www.ups.com/assets/resources/media/en_GB/modern-slavery-statement.pdf

5.5 Confidentiality and Data Protection

Marken recognizes its responsibility to protect the confidentiality and rights associated with information attained through the course of its business dealings.

5.5.1 Core Principle

To use data ethically, keep it confidential and uphold data protection principles.

5.5.2 Policies

Marken has confidentiality agreements in place with Employees to prevent any unlawful disclosure of confidential information or use in ways others than those intended. The principle of confidentiality, however, does not extend to such protected disclosures defined and safeguarded by Marken's *POL-HRS-004 Whistle-Blowing Policy* (accessible on ZenQMS).

To refrain from using data unethically or in a way that is in breach of existing data protection laws, Employees must adhere to Marken's *POL-DAT-001 Global Privacy and Data Protection Policy*, *POL-ITS-003 Global Information Security Policy*, and *MOP-ITS-022 Acceptable IT Use Procedure* (all accessible on ZenQMS).

5.6 Environmental Stewardship

Marken is committing to minimise its environmental impact and to search for more sustainable practices.

5.6.1 Core Principle

To appraise and seek to continuously improve environmental performance, with the aim of enhancing the sustainability of our business and that of our customers, subcontractors, and the wider community.

5.6.2 Action Taken and Policy

Marken has created the Corporate Sustainability Department to progress sustainable practices within our organization and advance the Ten Principles of the UN Global Compact.

Marken's *POL-SUS-002 Sustainability Policy* (accessible on ZenQMS) is intended to ensure that Marken, as well as our Employees fulfil this core principle, by setting sustainability targets for our company and assigning responsibilities for their fulfillment.

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5.7 Compliance

5.7.1 Laws and applicable Sanctions

Marken recognizes its responsibility to adhere to all applicable laws, regulations and international sanctions. Marken ensures that its customers and subcontractors also comply with applicable laws, regulations, embargoes and sanctions through ensuring adequate language is in place in customer and LSP contracts.

To ensure compliance with applicable laws and regulations, Marken's Trade Compliance team, with assistance from Marken's Legal team, is responsible for compliance with applicable embargoes and sanctions. Marken Legal and Trade Compliance undertake a regular review of changes to law and assess the impact on our business. To the extent compliant with applicable laws, we perform a daily, global Denied Party Screening of all Marken shipments to ensure we are not engaging in any activity with a party or entity found on any of the US or International denied party lists.

Marken Legal and Trade Compliance release training to all Employees to ensure Employees understand their role in assisting the business to meet its global obligations.

5.7.2 Meeting our obligations

Marken takes its obligations to its people, customers and society, seriously. As such, we aim to meet the following targets, year on year:

- (a) Acknowledgement of the Employee Code of Ethics and adherence to the obligations therein = 100% compliance
- (b) LSP Code of Ethics to be signed by Marken LSPs:
 - (i) Year 1 = all new LSPs
 - (ii) Year 2 = 50% compliance by LSPs
 - (iii) Year 3 = 60% compliance by LSPs
 - (iv) Year 4 = 70% compliance by LSPs
 - (v) Year 5 = 80% compliance by LSPs

If Employees and LSPs have concerns regarding signing the applicable Code of Ethics, Marken will work with the Employee and/or LSP to understand their concerns and assist them in understanding why this Code is important and how they can comply.

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5.8 Accounting Accuracy and Integrity

All business transactions must be reflected accurately and fairly in Marken’s accounting records in accordance with established procedures (which shall be subject to audit). Marken’s accounting records will reflect and describe the nature of the underlying transactions.

6. Concerns and Whistleblowing Procedure

Marken is committed to meeting its obligations under this Code, for not only the betterment of our company, Employees and clients, but society more generally.

If you feel that we, or any member of our team, have not upheld our obligations under this Code, we welcome you to speak with your manager or HR so that your concerns can be escalated, and we can work with you on a solution. Every report will be treated with reasonable discretion and no individual shall suffer adverse consequences from the act of reporting a breach or lodging a complaint relating to the Code in good faith.

In severe cases of breach and/or in cases where the reporting individual wishes anonymity and confidentiality, the procedure set out in *POL-HRS-004 Marken Whistle-Blowing Policy* should be followed. The different reporting procedures which exist and are outlined in the Whistle-Blowing Policy should be reviewed and considered before making use of the Whistle-Blowing Hotline.

Marken Whistle-Blowing Hotline: +1-800-220-4126.

7. Related Documents

MOP-ITS-022	Acceptable IT Use Procedure
POL-DAT-001	Global Privacy and Data Protection Policy
POL-HRS-001	Anti-Corruption Compliance Policy
POL-HRS-004	Whistle-Blowing Policy
POL-HRS-011	Grievance Policy
POL-HRS-012	Harassment Policy
POL-HRS-014	Diversity and Inclusion Policy
POL-HRS-021	Marken Employee Handbook
POL-ITS-003	Global Information Security Policy
POL-SUS-002	Sustainability Policy

8. Distribution List

Copies of this document will be available to staff via ZenQMS.

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9. Glossary of Terms and Abbreviations

In this Policy:

“**Employees**” encompasses all Marken employees, directors and officers.

Our “**Stakeholders**” are UPS, our customers, employees, subcontractors and community and the Environment.

“**Code**” means Code of Ethics

“**LSPs**” encompasses all Local Service Providers.

“**LSP Code of Ethics**” means the Code of Ethics applicable to Local Service Providers. The LSP Code of Ethics is available in Appendix 1.

10. Appendix

Appendix 1: Local Service Provider Code of Ethics

11. References

“**ILO Declaration**” means the ‘International Labour Organisation Declaration on Fundamental Principles and Rights at Work’ (accessible at <https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>).

The “**International Bill of Human Rights**” encompasses the United Nations’:

- (a) ‘Universal Declaration of Human Rights’ (accessible at <https://www.un.org/sites/un2.un.org/files/udhr.pdf>);
- (b) ‘International Covenant on Economic, Social and Cultural Rights’ (accessible at <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>); and
- (c) ‘International Covenant on Civil and Political Rights’ (accessible at <https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx>).

The “**UN Global Compact**” is a voluntary initiative based on CEO commitments to implement universal sustainability principles and to take steps to support UN Goals.

The “**UK’s Modern Slavery Act**” means the United Kingdom’s ‘Modern Slavery Act 2015’ (accessible at <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>).

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Appendix 1

MF-SUS-001 v01

Local Service Provider Code of Ethics

Marken is committed to conducting its global business in adherence to ethical practices. This includes working with those Local Service Providers (collectively, "**LSPs**") who share these principles and strive for continuous improvement in business practices.

Please confirm that your company meets the requirements set out in the following core principles by signing the Certificate of Compliance on page 2.

1. Marken and LSP Core Principles

1.1 Health and Safety

We maintain and manage safe and healthy working conditions for all directors, employees, workers (collectively, "**Employees**") and LSPs. We take sufficient steps to ensure our Employees refrain from taking any action or inaction which threatens the health and safety of themselves or others.

1.2 Anti-Discrimination

We provide equal opportunities to all persons and are strongly committed to the principle of equality regardless of race, religion or belief, age, nationality, sex, disability, pregnancy/maternity, gender reassignment, marital or civil partnership status or sexual orientation. We do not condone any discriminatory acts or attitudes in the conduct of our business between our Employees or with any external parties

1.3 Anti-Corruption, Anti-Bribery and Anti-Money Laundering

We ensure that all Employees, LSPs or any person or entity doing business on our behalf:

- (a) refrain from, directly or indirectly, offering to pay, solicit or accept a bribe, or any other such payment which may be construed as such, in any form;
- (b) act with honour and integrity at all times and refrain from any fraudulent or misleading behaviour by strictly complying with all applicable anti-corruption laws; and
- (c) know how to identify money laundering requests or activities and report it to management.

1.4 Fundamental Human Rights and International Labour Rights

We uphold fundamental human and international labour rights by ensuring all Employees are:

- (a) of the legal working age;
- (b) paid a minimum wage;

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- (c) not discriminated against; and
- (d) granted freedom of association and the right to collective bargaining.

We commit to working with our Employees to ensure that their concerns, complaints or suggestions are heard, and do our best to engage with Employees to ensure they feel safe and satisfied with their workplace.

1.5 Confidentiality and Data Protection

We protect the confidentiality and rights associated with information attained through the course of our business dealings and ensure all data is attained, retained, and used ethically and always in accordance with applicable data protection laws.

1.6 Environmental Stewardship

We take all reasonable steps to minimize our environmental impact. We commit to appraise and improve our environmental performance by continuously searching for and implementing more efficient and sustainable business practices. Each year, we will work with Marken to understand any improvements that could be made to our network to reduce our carbon footprint.

1.7 Compliance with International Laws and Sanctions

We adhere to all international laws, treaties and sanctions applicable to our business operations, Employees and LSPs.

1.8 Accounting Accuracy and Integrity

We ensure that our business transactions are reflected accurately and fairly in our accounting records in accordance with established procedures, and that any accounting records are subject to audit, if required by law.

2. Complaints procedure

We ensure that Employees have a safe and secure means to report any breaches or suspected breaches of this Code of Ethics to our management team. Reports are treated with discretion and no individual shall suffer any adverse consequence as a result of reporting a breach, suspected breach or lodging a complaint.

Questions?

If you have any questions on this LSP Code of Ethics, please contact your Marken representative.

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CERTIFICATE OF COMPLIANCE

I am duly authorised to sign this Code of Ethics on behalf of the company named below.

I have read this Code of Ethics and confirm that we understand our obligations herein and that our organization, business practices and Employees meet the requirements set out in this Code of Ethics.

Director / Authorised Signatory:

Signature: Company:

Name: Date:

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REVISION HISTORY

Version 01 Effective on 25-Mar-2022

First version

DOCUMENT ELECTRONIC SIGNATURES

DOCUMENT APPROVAL WORKFLOW

Author Approval

Jonathan Fuhr
Assistant
jonathan.fuhr@marken.com

I am the author of this document.
Signed 5:40:26 PM UTC 21-Mar-2022

Required Workflow Steps for this Category

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Chief Officer
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Department Approver
I have reviewed and approve this document.
Signed 6:49:33 PM UTC 24-Mar-2022

Elizabeth Chapman
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I have reviewed and approve this document.
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I have performed this step.
Signed 8:16:25 PM UTC 21-Mar-2022