

## Link Logistics Code of Conduct Business Relationships

The purpose of this Business Relationships Code of Conduct (CoC) is to share Link Logistics' expectation with business relationships, including suppliers and partners, that they demonstrate responsible business conduct by managing adverse impacts on internationally agreed principles for sustainable development. It is part of our responsibility to require our business relationships to meet the same global standard, as we are.

### **The Global Minimum Standard**

The areas covered by this CoC are reflected by the UN Global Compact principles. The requirement to manage risks of actual and potential adverse impacts, and enabling access to remedy for impacted stakeholders is aligned with the minimum requirements in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD), that together make up the global minimum standard for responsible business conduct. Meeting the minimum standard is distinct from legal compliance; Business Relationships are always expected to comply with national laws where they operate.

Link Logistics expects all of our business relationships to meet the globally agreed minimum standard for responsible business conduct. Link Logistics reserves the right to levy additional, more specific requirements related to sustainable development, should specific circumstances require such focus.

### **Scope**

The required management system shall, at a minimum, address adverse impacts on the human rights stated in the International Bill of Human Rights, including the core labour rights from the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work; significant adverse impacts on the external environment in relation to areas addressed by the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement; and adverse impacts on economic sustainability, including anti-corruption, the scope of which is outlined by the United Nations Convention against Corruption as well as OECD.

### **Management Requirements**

Meeting the global minimum standard involves managing adverse impacts in relation to internationally agreed principles for sustainability. The following elements of a management system shall be met:

#### **i. Adopt a Policy Commitment**

The Policy Commitment of our business relationships shall:

- be approved at the most senior level of their company;
- be informed by experts in the UNGPs and OECD;
- stipulate their expectations of stakeholders, at minimum employees and business relationships;
- be publicly available and communicated both internally and externally; and
- be embedded in all other operational policies and procedures throughout their company.

#### **ii. Establish and Maintain a Due Diligence Process**

Business Relationships shall conduct regular assessments of risks of adverse impacts on the Scope (see above) to identify whether they cause or contribute to adverse impacts through their own operations or services. They shall then act to prevent or mitigate identified adverse impacts and track the effectiveness of their actions. Business relationships are expected to communicate about this process (findings, actions taken, and ongoing status) to relevant stakeholders, including Link Logistics. Our business relationships should further require from their own business relationships that they meet the global minimum standard as well. If a business relationship becomes aware of a severe adverse impact that it is linked to, the

business relationship must use or build leverage to make the causing or contributing entity stop the impact and prevent or mitigate re-occurrences – or consider ending the relationship.

### iii. **Provide for access to remedy**

Where a Business Relationship identifies that it causes or contributes to actual adverse impacts in relation to the Scope, the Business Relationship must provide for access to remedy through legitimate processes (grievance mechanisms) for those affected. Notification of relevant authorities may be necessary in relation to significant impacts in the areas of environment and economy.

### **Implementation**

- i. Link Logistics also implements the requirements outlined in this CoC and is prepared to share information or documentation with its Business Relationships.
- ii. This CoC applies to Link Logistics' first-tier Business Relationships. Link Logistics' first-tier Business Relationships shall expect their first-tier business relationships to have similar and adequate processes in place to manage adverse impacts on the Scope. This includes making such business relationships aware of the minimum standard for responsible business conduct as outlined by UNGPs/OECD and requiring that such business relationships meet the minimum standard.
- iii. If Link Logistics' Business Relationships cause, contribute to, or are linked to severe impacts on the Scope, Business Relationships shall inform Link Logistics immediately. The information shall include an account of the Business Relationship's actions to end the severe impact and to prevent or mitigate reoccurrence. If a Business Relationship neglects to notify Link Logistics of and address severe adverse impacts or demonstrates lack of willingness to meet the international minimum standard, Link Logistics reserves the right to end the business relationship immediately.
- iv. Business Relationships must maintain appropriate records to demonstrate compliance with the requirements of this CoC. Appropriate records include: Policy statement(s), documentation of due diligence processes, including operational-level impact assessments with transparent records on tracking effectiveness of specific actions, and documentation of grievance mechanisms.
- v. This CoC should form the foundation for collaboration between Link Logistics and our Business Relationships to pursue continuous improvements in managing adverse impacts on the Scope. Should a Business Relationship not have implemented a management system in alignment with this CoC at receipt, an implementation plan shall be developed and, if required, presented to Link Logistics.
- vi. Link Logistics expects Business Relationships at any time to be able to declare their stage of implementation and/or share documentation in relation to the requirements contained in this CoC.