



Purpose

As a responsible company and leader in transportation services and supply chain solutions, Watco Companies, L.L.C. and its subsidiaries and affiliates (collectively “Watco”) have established standards for its business-related practices that are laid out in our Code of Conduct (“Code”). We consider vendors, suppliers, contractors, and other contracted third parties (each a “Third Party” and collectively “Third Parties”) as vital extensions of our company. We depend on them to help us provide the broad array of solutions our customers and our Team Members expect. And they should depend on us to strive to establish a business relationship that is fair, safe, and brings value to all involved. The Code reflects our commitment to our values of the health and safety of all stakeholders, ethical business practices, and respecting environmental concerns.

While we understand that Third Parties are independent vendors, suppliers, and contractors etc. from Watco and nothing under this Code may be construed to create a partnership, joint venture, employment, or agency relationship between Watco and its Third Parties, the business practices and actions of a Third Party could significantly impact and reflect upon us. Because of this, Watco expects all third parties and their employees, agents, and subcontractors to follow our high standards set forth in these guidelines while they are conducting business with us or on our behalf. Therefore, in consideration for being approved as a Watco Third-Party, you agree to comply with this provisions of this Code as follows and as may be amended from time to time:

Watco Foundation Principles

Our culture reflects the importance we place on customers, team members, and safety. It’s our belief that taking care of these three areas is the right way to take care of business.

- Value Our Customers – Our company has heart and passion for serving customers and for solving any supply chain challenge.
- Value Our People – Watco cares deeply about our people. We focus on bringing out the best in people, supporting their goals and offering opportunities for team members to develop their skills and broaden their experiences.
- Safely Improve Every Day – Safety is at the center of everything Watco does. We look out for team members’ safety and overall well-being, doing everything in our power to return you home just as you arrived.

Watco's Code of Conduct

1. Health and Safety

Watco strives to maintain a safe and healthy workplace for its own team members and all vendors, suppliers, contractors, and collectively any "third party." The focus on all health and safety is of utmost importance to the success of our business. Third parties shall implement procedures and safeguards as needed to prevent workplace hazards, and work-related accidents and injuries, including procedures and safeguards to prevent industry-specific workplace hazards. Safety and loss control shall be an integral part of each operation.

- 1.1. Master Services Agreement – All Third-Party service providers are required to execute a Master Services Agreement ("MSA") or other mutually agreed document and will be responsible for ensuring all workers under their supervision are aware of the requirements identified within Watco's *Third-Party Safety Policy*.
- 1.2. Purchase Order – Where applicable, all Third Parties must adhere to Watco's *Purchase Order Terms & Conditions* (Rev 0 – April 2014).
- 1.3. Watco Contractor Training – All Third Parties who must register with *Watco Contractor* (watcocontractor.com) shall complete the required safety courses prior to operating on Watco properties.

Additionally, all Third Parties need to obtain and understand the *Third-Party Management Guidance* (Rev 1 – December 2025) and any site-specific hazard communications when assisted by a Watco facility manager.

2. Ethics and Business Practices

Watco pledges and expects its Third Parties to pledge to conduct business with integrity, fairness, honesty, and to adopt responsible business practices.

- 2.1. Laws – All Third Parties must comply with all applicable laws, including data privacy laws, and regulations must document compliance with regulatory requirements and service-level agreements.
- 2.2. Accurate Records – Watco expects all Third Parties to provide honest and accurate invoices. Invoices should be itemized, quote the PO number (where relevant), be supported by appropriate documentation and comply with all other requirements as set out in the relevant contract(s). Invoices may not be split to circumvent approval requirements.
- 2.3. Conflicts of Interest – No Watco team member nor Third Party should engage in a practice or enter into a transaction that would induce or influence a Watco Team Member to act other than in the best interest of Watco.

- 2.4. Data Protection – Watco and its Third Parties must ensure that confidential information and intellectual property are protected and used for specifically approved purposes. No Third Party may publicly post in any format of media, physical or electronic, about Watco business unless specifically authorized by Watco’s Marketing Department or required by applicable law.
- 2.5. Anti-Corruption – Watco and its Third Parties must be transparent and cannot be involved in corruption in any form, including extortion and bribery, as defined under applicable law where the Third Party is conducting its business. Both parties undertake to comply with the applicable law regarding fair competition and not to abuse any market position. Third Parties must adhere to Watco’s *Anti-Corruption, Anti-Money Laundering, and Trade Control Compliance Policy* (Rev 0 – Nov 2020).
- 2.6. Anti-Discrimination – Watco is committed to equal opportunity for its Team Members and Third Parties and will not tolerate, and as a Third Party you agree to not engage in, any acts of discrimination or harassment.
- 2.7. Whistleblower and No-Retaliation / Reporting Violations – Watco maintains a Safety and Ethics Hotline at (866) 479-2826 for all team members and Third Parties to report questionable incidents. Callers to the hotline may remain anonymous if desired.
- 2.8. Labor & Human Rights – Watco prohibits all Third Parties from employing children in their activities. The term “children” refers to individuals under fifteen (15) years of age. Third parties must comply with and apply the minimum wage regulations applicable in the country of operation. Third Parties must respect the maximum permitted working hours and cannot force employees to work overtime. Watco forbids vendors from using forced labor or disciplinary measures, which include corporal punishment, psychological or verbal pressure, verbal abuse, and/or payroll deductions. Human trafficking in any form as defined by the United Nations is also strictly prohibited.

3. Environmental Management

Watco requires that all Third Parties on Watco properties are in compliance with environmental regulations and that risks to Watco are adequately addressed. All Third Parties must adhere to Watco’s *Third Party Operations – Environmental Regulatory Guidance* (Rev 0 – June 2020) document, in addition to the where-applicable policies listed below.

3.1. Environmental Policies:

- 3.1.1. *Environmental Health and Safety Policy* (Rev. 0 – July 2024)
- 3.1.2. *Environmental Spill Response Guidance* (Rev. 3 – May 2023)
- 3.1.3. *RCRA Hazardous Waste Guidance* (Rev. 1 – August 2020)

3.1.4. *RCRA Universal Waste Guidance* (Rev. 1 – August 2020)

3.1.5. *Used Oil Guidance* (Rev. 0 – September 2020)

3.1.6. *Non-hazardous Industrial Waste – Special Waste Guidance* (Rev. 0 – June 2021)

3.1.7. *Waste Transfer Facilities Guidance* (Rev 1 – September 2023)

3.2. Energy and Water Usage – Watco’s Third Parties must endeavor to optimize Watco’s and their own energy consumption (electricity, gas, fuel, etc.) in their activities or in the workplace. Watco’s Third Parties are expected to manage water resources responsibly by limiting water usage and ensuring that wastewater is treated and discharged in compliance with local regulations and in a manner that protects ecosystems and human health.

3.3. Natural Resources – All Third Parties shall demonstrate responsible use and management of all natural resources at Watco facilities, including but not limited to forests, water, soil health, and biodiversity.