



Code of Conduct

Status: Corporate – Mandatory **Applies to:** All employees, officers, directors, contractors, agents, and representatives of RIC Global Shipping LLC

1. Purpose and Corporate Commitment

RIC Global Shipping LLC (“RIC”) is committed to conducting its business with the highest standards of integrity, legality, professionalism, and responsibility. This Code of Conduct establishes the **mandatory principles and rules of behavior** that govern all activities carried out by RIC and by individuals acting on its behalf, regardless of geographic location or specific client engagement.

Compliance with this Code is a condition of employment, engagement, and continued association with RIC.

2. Ethical Conduct and Integrity

RIC conducts its business honestly, transparently, and in good faith. All individuals must: - Act with integrity in all professional activities - Avoid deceptive, misleading, or fraudulent practices - Disclose and appropriately manage conflicts of interest. Unethical conduct is not tolerated under any circumstances.

3. Anti-Corruption and Anti-Bribery

RIC maintains a zero-tolerance policy toward bribery and corruption. All individuals must comply with applicable anti-corruption laws, including but not limited to: - U.S. Foreign Corrupt Practices Act (FCPA) - UK Bribery Act - Applicable local anti-corruption laws. Prohibited conduct includes: - Offering, giving, requesting, or accepting bribes or facilitation payments - Providing improper gifts, benefits, or advantages - Engaging in corrupt or unethical influence over public or private parties

4. Human Rights and Labor Standards

RIC respects internationally recognized human rights and labor standards. The Company does not tolerate: - Forced, compulsory, or trafficked labor - Child labor - Discrimination, harassment, or abusive conduct. RIC supports fair wages, lawful working hours, and safe working conditions.

5. Legal and Regulatory Compliance

RIC operates in regulated logistics and transportation environments and complies with all applicable laws and regulations, including those related to: - Transportation and logistics - Aviation security - Customs and international trade - Sanctions, export controls, and embargoes

No individual may perform or request any action that would violate applicable law or place RIC at legal or regulatory risk.



6. Security and Supply Chain Integrity

The security of shipments, information, and facilities is a core responsibility of RIC.

All individuals must: - Protect the integrity of the supply chain - Maintain chain of custody where applicable - Follow security procedures and access controls - Immediately report security incidents or anomalies

7. Data Protection and Confidentiality

RIC is committed to protecting personal, commercial, and confidential information.

Individuals must: - Access data only as required for legitimate business purposes - Protect data against unauthorized access or disclosure - Comply with RIC data protection and confidentiality policies

Confidentiality obligations continue after termination of employment or engagement.

8. Environmental Responsibility

RIC conducts its operations with consideration for environmental responsibility and in compliance with applicable environmental laws.

Individuals are expected to support responsible and sustainable business practices.

9. Third Parties and Business Partners

RIC expects its suppliers, subcontractors, and business partners to adhere to ethical, legal, and compliance standards consistent with this Code.

Third-party relationships are subject to due diligence and contractual compliance requirements.

10. Reporting Concerns and Non-Retaliation

All individuals have a duty to report suspected: - Legal or regulatory violations - Ethical misconduct - Security or compliance breaches. Reports made in good faith are treated confidentially and without retaliation.

11. Disciplinary Measures

Violations of this Code may result in disciplinary action, including termination of employment or contractual relationship, and may be reported to authorities where required.

12. Applicability and Updates

This Code of Conduct applies at all times and across all RIC operations. RIC may adopt additional standards or requirements to meet contractual obligations with clients, partners, or authorities. Such additional requirements do not replace this Code but operate alongside it.

Approved by:

Senior Management
RIC Global Shipping LLC