



Vendor Code of Conduct

This Vendor Code of Conduct ("Code") describes Global Container International LLC's ("Company") expectations as to how our vendors conduct business. All vendors providing products or services to the Company are expected to act according to this Code and with integrity and a demonstrated commitment to legal, ethical, safe, fair, and environmentally responsible business practices. To that end, the Company has established a set of standards of business practices that applies to all vendors with whom the Company conducts a business relationship. Vendors must understand this Code's requirements and communicate its provisions throughout their organization and supply chain, including subcontractors. At a minimum, vendors must comply with all applicable laws, rules, regulations, and standards within the geographies in which they operate.

Following are the fundamental principles of the Code.

Compliance with Laws and Regulations: Vendors must comply with all applicable laws and regulations, including labor and employment, environmental protection, and anti-corruption.

Business Ethics: Vendors must conduct business with integrity, honesty, and transparency. Bribery, corruption, and other unethical practices will not be tolerated.

Labor and Employment Practices: Vendors must provide safe and healthy working conditions for their employees and comply with all applicable labor laws and regulations, including those related to wages, working hours, and overtime.

Non-Discrimination: Vendors must not discriminate against employees or job applicants based on race, gender, age, religion, or any other protected category.

Environmental Protection: Vendors must strive to minimize their environmental impact, including reducing waste and pollution, conserving energy and water, and complying with all applicable environmental laws and regulations.

Protection of Intellectual Property: Vendors must respect the intellectual property rights of others and must not engage in any activities that infringe on those rights.

Confidentiality and Data Security: Vendors must maintain the confidentiality of any

proprietary or confidential information they may receive from the Company and take steps to protect that information from unauthorized access, disclosure, or use.

Supply Chain Management: Vendors must take responsibility for the actions of their suppliers and subcontractors and must ensure that they also comply with this Code.

COMPLIANCE WITH THE CODE OF CONDUCT

It is the responsibility of the vendor to understand and comply with this Code and to inform its Company contact (or a member of Company management) if any situation develops that causes the vendor to operate in violation of this Code. Company vendors are expected to self-monitor their compliance with this Code. In addition to any other rights the Company may have under its agreement with the vendor, the Company may immediately terminate its relationship with a vendor who acts in a manner that is unlawful or inconsistent with this Code.

QUESTIONS ABOUT THE VENDOR CODE OF CONDUCT

If you have questions about this Vendor Code of Conduct, including questions regarding a possible violation of this Code, the Company has various resources available to assist you.

You are encouraged to work with your primary Company contact in resolving a business practice or compliance concern. However, the Company recognizes that there may be times when this is not possible or appropriate. In such instances, please get in touch with our Chief Executive Officer at +1-339-203-0939; jsg@gcxint.com or Global Container International LLC, 361 Newbury Street, Boston, MA 02115.

The Company will not tolerate any retribution or retaliation taken against any individual who has, in good faith, reported questionable behavior or a possible violation.

We thank you for your compliance with this Vendor Code of Conduct.