

## American Commercial Barge Line Vendor Code of Conduct

### Introduction:

The American Commercial Barge Line (ACBL) Vendor Code of Conduct outlines the company's expectations for the ethical business behavior of its vendors. All vendors supplying goods or services to ACBL will abide by the guidelines set forth in the code. Sustainable procurement at ACBL is based in the United Nations Global Compact, and the ACBL Code of Ethics.

ACBL requires its Critical Vendors to complete questionnaires or surveys when requested, and to team up with ACBL's commitment to maintain ethical standards by adhering to this Vendor Code of Conduct.

ACBL has established core values that guide our employees and how we conduct business. ACBL expects its suppliers to adhere to the same principles that guide our actions. It is through these values that everyone makes an IMPACT.

**I**ntegrity – We build trust through honest and transparent relationships.

**M**utual Care – We prioritize safety, team member wellbeing, community support, and Environmental sustainability.

**P**ersonal Responsibility – We hold ourselves accountable for our decisions and actions.

**A**gility – We continuously improve and transform to deliver innovative solutions to an ever-changing industry.

**C**ustomer Focus – We go to great lengths to understand our customer's business in order to be an integrated partner in their supply chain.

**T**eamwork – We empower, inspire, and engage our Team Members to achieve operational excellence and provide a diverse & inclusive workplace.

Vendors must demonstrate a firm commitment to business practices that are legal, fair, safe and sustainable. Vendors are required to understand the requirements of this code and operate in accordance

with the expectations set forth. At a minimum vendors will comply with all applicable laws, regulations and standards where they operate.

### **Vendor Code of Conduct:**

1. Ethical Business Practices – ACBL is committed to operating with the highest ethical standards and in compliance with all applicable laws. ACBL expects its vendors and their employees to share this principle.

1a. Anti-bribery and Corruption- Vendors are expected to comply with all applicable laws and regulations regarding bribery and corruption, including the U.S. Foreign Corrupt Practices Act and any local anti-bribery and anti-corruption laws.

It is strictly prohibited for vendors to corruptly offer, promise, or solicit anything of value for the purpose of securing business or a business advantage for or from ACBL. This prohibition extends not only to ACBL employees, but also public officials, customers, and suppliers. Facilitation payments to expedite or secure performance of a routine governmental action is also strictly prohibited.

1b. Gifts, Travel & Entertainment- Vendors must not provide inappropriate gifts, fees, favors, travel, or entertainment that are intended to influence a business decision. Inappropriate gifts are any gifts of more than a nominal value or unreasonable entertainment. Such inappropriate gifts can create an expectation of an obligation or the perception of an improper relationship.

1c. Responsible Sourcing of minerals- Vendors must ensure that the sourcing of minerals does not knowingly contribute to armed conflict, terrorist financing or human rights violations.

2. Labor and Human Rights- ACBL and its vendors must be committed to protecting human rights. Vendors shall ensure their partners respect internationally accepted standards for human rights and comply with all applicable laws where they operate.

2a. Wage and Benefits- Vendors should pay workers regularly and timely the legal minimum wage, the industry standard, or applicable collective agreements, whichever is higher. In addition, vendors are encouraged to pay a living wage higher than mandated minimum wages.

2b. Slavery and Forced Labor – ACBL will not tolerate slavery, forced labor, or human trafficking in any form. ACBL will not knowingly do business with vendors who participate or allow their subcontractors to participate in such practices. Vendors shall not and shall require all supply chain partners to not support, require, or engage involuntary or forced labor, prison labor, or debt bonded labor.

2c. Child Labor- Vendors will not employ child labor and must comply with all applicable minimum legal age requirements. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for

employment in the country, whichever is higher. The vendor must also comply with all other child labor laws.

- 2d. Non-Discrimination, Harassment, and Inclusion- Workers will always be treated with respect and dignity. Vendors will comply with all applicable laws pertaining to discrimination in hiring and employment practices. Vendors are expected to maintain a work environment free of discrimination, harassment and victimization based on any grounds, including but not limited to age, disability, ethnic or social origin, nationality, race, marital status, parental status, pregnancy, political convictions, religion, veteran status, gender, gender identity, or sexual orientation. Vendors shall not participate or condone the use of violence and abuse (physical, verbal, sexual, or psychological) at any time.
3. Freedom of Association- Vendors shall respect and not interfere with workers' rights to freedom of association and collective bargaining by ensuring that they meet or exceed the relevant requirements of local regulations.
4. Safe and Healthy Workplace- Vendor is required to provide a safe, healthy, and sanitary working environment that strives to minimize health and safety risks and supports accident prevention. Vendors must establish and enforce procedures and safeguards that limit workplace hazards, accidents, and injuries. Vendors shall provide workers access to appropriate personal protective equipment to protect workers from dangers (or risks?) encountered during the execution of their work scope.
5. Environmental Stewardship- Vendor shall operate in compliance with all environmental laws, regulations and treaties relating to waste disposal, emissions, discharges, and hazardous and toxic materials. Where appropriate to the size and nature of their operations, vendors should address the environmental impacts from its operations including raw materials, greenhouse gas emissions, water, waste, air quality, and biodiversity.

Vendors may submit questions or comments regarding the Code of Conduct. Any facts or circumstances which are likely to lead or have resulted in the vendor's inability to meet the requirements of the Code of Conduct should be reported to ACBL's 24-hour ethics hotline 888-709-5125.

ACBL reserves the right to review each Vendor's policies, procedures or any other document related to adherence to this code. If a vendor is found to be in violation of the code, the vendor is expected to immediately or as soon as practical remedy the violation. Failure to remedy the solution may lead to review or termination of the business relationship.

ACBL is committed to continually reviewing and improving this code. This code is subject to revision and the latest version is available here [Suppliers - American Commercial Barge Line \(bargearcbl.com\)](http://bargearcbl.com)

In the event of any conflict between provisions of this code and the provisions of any relevant contract with the vendor, the provisions of the contract take precedence.