



Supplier Code of Conduct



East Coast Warehouse Safeway Trucking Corporation Safeway Logistics Solutions and affiliated companies.

SUPPLIER AND VENDOR CODE OF CONDUCT

East Coast Warehouse and Safeway Trucking Corporation as well as Safeway Logistics Solutions dba Safeway Trucking Corporation ("ECW and Safeway" for reference below is a premier provider of World Class Warehousing Transportation and Logistical Services with multiple operating locations throughout the country. We deal with a large network of Suppliers and Vendors who provides services and resources which support our efforts. We seek to do business with Vendors and Suppliers who share our ethical beliefs and Codes of Conduct while providing quality materials and services at the best competitive pricing.

Accordingly, all vendors and suppliers providing goods, products, and services to our companies and affiliates are expected to adhere to the following principles and requirements.

Laws

Suppliers are expected to conduct their business and comply with all laws of the applicable legal system where they operate with no exception. Additionally, where applicable Suppliers and Vendors must comply with International and local anti-corruption and bribery laws and standards. This includes the offering of gifts, services or benefits to ECW and Safeway to influence employee's decision making or conduct. The provision of Company Branded small- value merchandise such as cups, apparel, etc. as well as reasonable meals during daily business are allowed.

Labor

Suppliers must respect the right of employees to freedom of association and collective bargaining. In the event local laws and practices restrict the right to freedom of association and collective bargaining, the Supplier will, to the extent legally permissible strive to have meaningful dialogue and communication with workers representatives without breaking the law.

Child Labor

Suppliers shall not employ children under the minimum age required by the jurisdiction or country in which they operate. If part-time work is permitted, it shall occur in such a way as not to hinder a minor's completion of compulsory schooling, or if it would be harmful to their health or development.

Working Hours and Compensation

Suppliers shall always with no exception comply with local laws and regulations regarding working hours, wages and benefits.

Anti-Discrimination

Suppliers shall provide a workplace free of harassment and discrimination. The supplier is expected to treat all people equally and fairly based on the principle of non-discrimination. The Supplier will be expected to employ, reward and promote as well as discipline based on the principle of equal opportunity without distinction according to race, color, gender, sexual orientation, religion, national or social origin, age and disability.

Anti-Harassment

The Supplier is expected to maintain a “zero tolerance” policy against physical, verbal sexual or psychological harassment, bullying abuse or threats in the workplace.

Health and Safety

Suppliers must comply with all occupational health and safety regulations and provide a work environment that is safe and conducive to good health, preventing workplace accidents, injuries, and work-related illnesses for employees, third parties, and the public. When conducting services at an ECW Safeway facility or using equipment, suppliers are expected to adhere to all site safety rules and regulations and follow instructions from ECW Safeway supervisors. Suppliers must maintain all required insurance protections mentioned at the time of agreeing to the terms of any services or purchasing agreements.

Responsible sourcing and environmental sustainment

Suppliers are expected, to the extent reasonably possible, to incorporate responsible sourcing considerations into their daily business operations and product procurement.

Free Competition

Suppliers are expected to foster and promote free competition within their business practices and must not engage in intentional manipulative pricing strategies that would lead to unfair trade practices.

Money Laundering

All Business Partners must take all appropriate measures to prevent their operations from being used as vehicles for money laundering.

Trade Laws and Export Controls

Business Partners and Suppliers must respect and comply with all applicable international trade restrictions and economic and trade sanctions, as well as all applicable laws and regulations concerning export and import controls applicable to their business.

Information Transparency

Vendors and Suppliers are required to provide clear and accurate information regarding the methods and resources used, production sites and product characteristics and refrain from making any misleading claims.

Confidentiality

vendors, suppliers, and business partners commit to taking all necessary measures to ensure the confidentiality of professional secrets and other non-public information they receive or access during their business relationships with ECW/Safeway. All the items outlined above are subject to audit by ECW/Safeway, which may request reports or, in the event of potential noncompliance, conduct an audit of applicable service practices with reasonable advance notice.



Subcontracting

Suppliers will be expected to “flow down” the requirements set forth in this code to their own subcontractors.

As a condition of doing business with an entity within the East Coast Warehouse and Safeway Trucking Corporation orbit, the below Business Partner certifies that it will comply with the Code and its requirements

Executed this _____ day of _____, 20____.

Business Partner, Supplier, Vendor, Name: _____

Address _____

DUNS NO _____

Authorized Representative Name and Position _____

Representative Signature _____