



# **CLASQUIN CODE OF BUSINESS CONDUCT**



# CLASQUIN

## CODE OF BUSINESS CONDUCT

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“At CLASQUIN, we aim to contribute to the Group’s sustainable growth. For several years now, our desire to be a GOOD COMPANY has been reflected in our involvement in initiatives around the 3 Ps: “People, Partner, Planet”.

As an international company, we are facing numerous changes and complexity. The growing globalisation of value chains requires us to be increasingly vigilant about the impact of our business operations. Over and above statutory requirements, our philosophy has always been to conduct our business in accordance with our core values of *“Enthusiasm, Professionalism and Integrity”* and we attach the utmost importance to managing our business in a responsible manner, in connection with our internal teams, our clients and our suppliers.”

# TABLE OF CONTENTS

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<b>INTRODUCTION</b>	<b>4</b>
CLASQUIN'S CORE VALUES	4
OBJECTIVE OF THE CODE	4
SCOPE OF THE CODE	4
INTERPRETING THE CODE	5
REPORTING OF MISCONDUCT	5
<b>STANDARD OF CONDUCT</b>	<b>6</b>
<b>ENVIRONMENT</b>	<b>6</b>
<b>HUMAN RIGHTS AND LABOUR STANDARDS</b>	<b>6</b>
NON-DISCRIMINATION	6
MUTUAL RESPECT AND FAIR TREATMENT	7
DIVERSITY	7
HARASSMENT AND OTHER ABUSIVE CONDUCT	7
FREEDOM OF ASSOCIATION	7
FORCED LABOUR AND MODERN SLAVERY	7
CHILD LABOUR AND PROTECTION OF YOUNG WORKERS	7
COMMUNITY AND STAKEHOLDERS ENGAGEMENT	7
OCCUPATIONAL HEALTH AND SAFETY	7
<b>ANTI-BRIBERY</b>	<b>8</b>
<b>CONFLICT OF INTEREST</b>	<b>8</b>
<b>SANCTIONS REGULATIONS</b>	<b>8</b>
<b>MONEY LAUNDERING</b>	<b>9</b>
<b>ANTITRUST LAWS</b>	<b>9</b>
<b>BUSINESS AND FINANCIAL RECORDS</b>	<b>10</b>
<b>CONTRACTS</b>	<b>10</b>
<b>CONFIDENTIAL INFORMATION, DATA PROTECTION AND PRIVACY, AND ELECTRONIC DEVICES</b>	<b>10</b>
CONFIDENTIAL INFORMATION	10
DATA PROTECTION AND PRIVACY	10
ELECTRONIC DEVICES	11
<b>SOCIAL MEDIA AND PUBLIC SPEAKING</b>	<b>11</b>
BUSINESS USE OF SOCIAL MEDIA	11
PUBLIC SPEAKING AND MEDIA ENGAGEMENT	11
<b>GLOSSARY</b>	<b>12</b>

## INTRODUCTION

### CLASQUIN'S CORE VALUES

As part of the MSC Group, CLASQUIN shares the MSC Group core values which constitute the cornerstones of the company and support CLASQUIN's vision, shape CLASQUIN's culture and establish CLASQUIN's future direction. These core values should also guide the conduct of all Employees in their interactions with each other



#### WE ARE A FAMILY COMPANY

The commitment of the founding Family inspires us with dedication and trust, increasing our sense of belonging. Sharing the family's entrepreneurial spirit leads us to act proactively, courageously and responsibly in the best interest of our customers and our Company.



#### WE HAVE PASSION

We are passionate about what we do, we challenge ourselves to achieve excellence and we are tenacious in overcoming obstacles. Working together with passion and enthusiasm, we provide a unique experience for our customers.



#### WE ARE IN CONTINUOUS EVOLUTION

Our tradition, expertise, professionalism and ambition drive our Company's fast and sustainable growth. We strive for the most innovative solutions to embrace change, always respecting safety and the environment.



#### WE CARE FOR PEOPLE

We believe that each person brings unique value. We develop authentic relationships built on ethics, respect and team spirit. We truly care about the satisfaction and loyalty of our customers and employees.



#### WE BELIEVE IN EQUAL OPPORTUNITIES

Our mission is to provide our people with personal fulfilment and enrichment. We are committed to sharing our knowledge, delivering training and support enabling our people's professional growth. We ensure fair opportunities providing long-term career development, embracing diversity and valuing all cultures.

### OBJECTIVE OF THE CODE

As a freight forwarding and overseas logistics specialist, CLASQUIN earns its reputation and trust every day by providing unparalleled services to its customers and by conducting business fairly and ethically. Our reputation for trust and integrity relies upon every action by every Employee every day.

The Code is complementary to, and must be read in conjunction with, other policies and procedures CLASQUIN may adopt for the purpose of implementing the Code's principles as well as other policies.

CLASQUIN also reserves the right to amend the Code from time to time. Employees should keep themselves informed and aware of any updates. The latest version of the Code can be found on CLASQUIN's website.

Employees are free to address any question on the Code and its implementation at [ethics@clasquin.com](mailto:ethics@clasquin.com).

### SCOPE OF THE CODE

The Code is a guideline to help Employees and Agencies to run ethical businesses. The implementation of this Code is of the highest priority for CLASQUIN, and CLASQUIN expects Agencies and Employees to adhere to it. CLASQUIN reserves its right to carry internal audits in order to ensure Employees' and Agencies' compliance with the standards set forth in the Code with the assistance of the support functions, and other departments or external auditors, as appropriate. CLASQUIN encourages its Agencies to complement this Code by adopting and implementing additional principles and policies to those contained herein. However, in no event shall those additional principles and policies conflict or be more lenient than the Code. All additional principles and policies shall be sent to CLASQUIN at [ethics@clasquin.com](mailto:ethics@clasquin.com) for their review and approval. Where differences exist as a result of local laws or regulations, either the Code, the additional principles and policies, or the local requirement, whichever sets the highest ethical standard, must be applied.

Each Employee is responsible and accountable for:

- Understanding and meeting the standards described in this Code;
- Keeping himself informed and aware of any updates; and
- Undertaking the relevant training courses aimed at improving awareness and understanding of the standards referenced in this Code.

Nevertheless, additional responsibilities lie with any Employee who is responsible for supervising others to:

- Act as a role model in strict compliance with the letter and spirit of the Code;
- Ensure that all Employees under their supervision have been made aware of and have been trained on how to apply the Code;
- Supervise and monitor the observance by their staff of the principles laid down in the Code; and
- Stop any conduct breaching the Code and report the conduct to [ethics@clasquin.com](mailto:ethics@clasquin.com).

## **INTERPRETING THE CODE**

The purpose of the Code is not to cover all circumstances or anticipate every situation that may arise. Instead, it sets forth the principles and policies for the conduct of CLASQUIN's business in an ethical manner. When encountering situations not addressed specifically by this Code, Employees should maintain the highest ethical standards observed in the industry. Situations that are not covered in the Code must be referred to [ethics@clasquin.com](mailto:ethics@clasquin.com).

If an Employee is unsure whether his conduct would be contrary to the Code, he should ask himself some simple questions:

- Is this action lawful and in compliance with the Code?
- Would it be harmless to CLASQUIN or to me if this conduct was known?
- Would I want my actions to be published on the front page of a newspaper?
- Would I want someone to act the same way towards me?

If the answer to any of these questions is "no", the action is deemed not compliant with the Code and should not be taken. If you are still unsure of the answer, then you should contact [ethics@clasquin.com](mailto:ethics@clasquin.com) for further guidance.

## **REPORTING OF MISCONDUCT**

Misconduct includes, but is not limited to, corruption, malfeasance, bribery, theft or misuse of CLASQUIN's property, fraud, coercion, any wrongdoing, intentional omission to perform a duty, or a violation of the Code or any CLASQUIN's policy and procedure.

Consistent with CLASQUIN's core values, the ability to speak up is a cornerstone for building an open and accountable workplace culture. Employees have at their disposal at [ethics@clasquin.com](mailto:ethics@clasquin.com) to report any Misconduct at any time.

Any Misconduct shall be reported expeditiously. Employees are strongly encouraged to use the CLASQUIN's dedicated email addresses and, alternatively, report to [ethics@clasquin.com](mailto:ethics@clasquin.com).

When reporting Misconduct, Employees may choose to identify themselves, or to remain anonymous in accordance with applicable laws. There will be no retaliation against any Employee making a report in good faith.

CLASQUIN takes alleged violations very seriously and will fairly investigate each allegation. Any failure to comply with the Code may lead to disciplinary actions up to and including termination of employment or any other contract, as well as possible civil or criminal penalties.

## STANDARD OF CONDUCT

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CLASQUIN is an air and sea freight forwarding and overseas logistics specialist. CLASQUIN designs and manages the entire overseas transport and logistics chain, organising and coordinating the flow of client shipments between France and the rest of the world and, more specifically, to and from Asia-Pacific, North America, North Africa and sub-Saharan Africa. Due to CLASQUIN's international presence, all Employees must comply with all applicable laws, regulations and rules, official guidelines, codes of best practice, partnerships with governments and ISO standards, whenever relevant.

In addition, the Code sets forth the common standard of approved behaviour, regardless of the location of the Employee. These standards supplement and may go well beyond compliance with laws and regulations in many countries where CLASQUIN operates.

## ENVIRONMENT

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CLASQUIN's objectives are to guide our organization in controlling its environmental impact in the short, medium and long term.

CLASQUIN adopts initiatives to raise awareness among our Employees and to reduce our environmental impact by reducing energy consumption and promoting "green energy", by implementing sustainable travel policy, by promoting waste management and daily actions for the planet.

Given that our core business is organizing international transport for our customers, we contribute to the decarbonization of their supply chain, which accounts for the majority of our greenhouse gas emissions, through our Smart Green offer:

- "LIVE GREEN": real-time awareness of the environmental impact of transport operations, based on concrete data such as distance travelled, net cargo weight and means of transport used.
- "FAST GREEN": simple, rapid action using controlled alternative options, offering existing or innovative solutions, such as the choice of transport method or modal shift and combined transport.
- "GREEN BY DESIGN": working with data to identify the levers of a "Green" transformation plan, such as densification, distance reduction, reduction of empty space, packaging adjustment, modal shift and digitisation.

Each Employee should be open-minded about innovation and change. Managers are encouraged to listen to Employees' ideas about how to reduce resource consumption.

## HUMAN RIGHTS AND LABOUR STANDARDS

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CLASQUIN supports and strives to continuously improve good corporate governance that contributes to social responsibility and broader sustainable development goals as expected by the international community. To achieve this, CLASQUIN complies at a minimum with all applicable laws, rules and regulations of the countries of operation. Additionally, CLASQUIN's commitment to promote responsible and fair business practices adheres to and draws upon internationally recognised human rights and labour principles and standards.

In this regard, CLASQUIN participates in the United Nations Global Compact and promote its ten principles.

### NON-DISCRIMINATION

Consistent with its core values, CLASQUIN is firmly committed to support employment opportunities by ensuring that all aspects of hiring and employment practices are based on the grounds of merit and work-related abilities.

CLASQUIN respects each person's individuality and does not tolerate discrimination based on for example : gender, colour, language, age, disability, trade union membership.

CLASQUIN and Agencies strictly comply with applicable national laws, local requirements and/or relevant prevailing local industry standards that respect and guarantee, at least at a minimum, its employees' rights in all aspects of employment. These include applications for employment, promotions, rewards, wages, overtime, working hours, leave, benefits, access to training, job assignment, social benefits, corrective and disciplinary actions, termination of employment or retirement.

## **MUTUAL RESPECT AND FAIR TREATMENT**

CLASQUIN believes that each person, including customers, business partners and all stakeholders with whom we interact, deserves to be treated with respect, fairness and dignity.

This responsibility lies with every Employee.

## **DIVERSITY**

The variety of Employees represents one of CLASQUIN's greatest assets and contributes to its continued success.

CLASQUIN expects its Employees to value the unique abilities, strengths and skills of each person and to support one another while embracing and respecting cultural diversity and local traditions.

## **HARASSMENT AND OTHER ABUSIVE CONDUCT**

CLASQUIN does not tolerate any form of harassment or abusive conduct, including verbal or mental coercion, corporal punishment and sexual harassment. Harassment and abusive conduct can include acts or threats of violence to another person (including gestures, bullying, "jokes" or intimidation, language and physical contact) as well as the intentional damaging of CLASQUIN and Agencies' property or the property of another person, or any other behaviour that causes others to feel unsafe in CLASQUIN or Agencies' workplaces.

## **FREEDOM OF ASSOCIATION**

CLASQUIN recognises the freedom of association of all Employees. All Employees shall have the right to join or not to join and form trade unions without fear of intimidation or reprisal, in compliance with applicable laws and regulations.

## **FORCED LABOUR AND MODERN SLAVERY**

CLASQUIN is committed to ensuring the respect of the fundamental human dignity of all its Employees.

## **CHILD LABOUR AND PROTECTION OF YOUNG WORKERS**

CLASQUIN strictly prohibits the use of child labour.

CLASQUIN's Foundation supports and invests in training programmes to unlock the potential of young people.

## **COMMUNITY AND STAKEHOLDERS ENGAGEMENT**

CLASQUIN has built its reputation by establishing and maintaining relationships at all levels with its customers, business partners and its wide range of stakeholders based on shared values, loyalty and mutual trust.

## **OCCUPATIONAL HEALTH AND SAFETY**

CLASQUIN seeks to provide Employees with a safe and healthy environment. To meet this goal, CLASQUIN:

- Complies with all applicable health and safety laws;
- Implements safety procedures in accordance with applicable regulations.

Employees also have responsibilities: they must comply with the prescribed occupational health and safety measures. Health and safety measures are established within CLASQUIN and Agencies; all Employees must follow them.

We are all responsible for ourselves and others with regards to health and safety. Therefore, each Employee has the right to remove themselves from dangerous situations or operations when there is an imminent and serious danger to safety or health.

In its effort to continuously improve health and safety performance in its operations, CLASQUIN conducts accident and near-accident investigations, whenever required by our internal processes.

## ANTI-BRIBERY

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While conducting business anywhere in the world, CLASQUIN is committed to undertake business fairly and to uphold all applicable anti-bribery laws, including, the French “Loi Sapin II”.

CLASQUIN strictly prohibits all Corruption, Passive and Active Bribery, and Facilitation Payments. Under most legislations, such conduct can lead to imprisonment for individuals and heavy fines for individuals and entities. CLASQUIN reserves the right to take disciplinary action towards any Employee engaged in such conduct. Employees must not engage in such conduct. Employees must not engage a third- party agent, consultant or supplier if there is reason to believe that the agent, consultant or supplier may attempt to breach CLASQUIN Anti-Bribery Policy.

Should Employees be asked to participate in Facilitation Payments they must actively refuse the payment and immediately inform CLASQUIN ([ethics@clasquin.com](mailto:ethics@clasquin.com)). The fact that the payment was first proposed by the other party does not make the conduct lawful. CLASQUIN has a zero-tolerance policy regarding Facilitation Payments, except when the health and safety of an Employee is at stake.

While Gifts provided to stakeholders are permitted, it is very easy to cross the line from modest value Gifts and Corporate Hospitality to Corruption. Modest value Gifts, which are allowed under CLASQUIN’s Gift Policy, include any CLASQUIN promotional Gift. CLASQUIN will not tolerate the payment of bribes to stakeholders nor Government Officials, including those disguised as Gifts.

Any Gift and Corporate Hospitality received or given to or by any Employee must be properly reported and recorded.

## CONFLICT OF INTEREST

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A Conflict of Interest may arise, for example, when an Employee engages in a business transaction with a third party (including, but not limited to, a freight forwarder, a broker and a non-vessel operator), in which the Employee or family member has a financial or personal interest (for example, as an owner, shareholder, board member, officer, employee or agent).

No Employee should become involved in any activity that would conflict or alter his judgement in performing his duties.

The CLASQUIN Conflicts of Interest Policy provides guidelines on how to identify, report and manage actual and potential Conflict of Interest situations. All Employees are required to read carefully and strictly comply with the CLASQUIN Conflicts of Interest Policy, which contains reporting duties for all Employees.

All Employees are requested to disclose any potential or actual Conflict of Interests.

Whenever circumstances give rise to such a Conflict of Interest, or even the appearance thereof, such Employee should obtain specific written authorisation before participating in business where his impartiality is likely to be questioned. If the Conflict of Interest relates to a significant value of business for CLASQUIN, it must be cleared by the relevant Management and, when in doubt by CLASQUIN Senior Management.

## SANCTIONS REGULATIONS

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Sanctions are prohibitions against engaging in specified international transactions involving certain individuals, entities, cargos, countries or vessels to achieve a national security/political objective.

Compliance with applicable sanctions is at the core of CLASQUIN’s business model. Therefore, all Employees and Agencies must comply with them, regardless of the trade or the commodity transported.

CLASQUIN has developed and implemented a sanctions compliance programme consisting of a set of procedures to ensure compliance with all applicable sanctions laws. Dedicated training programmes and IT tools have been developed to train Employees and implement CLASQUIN’s sanctions compliance programme.



## MONEY LAUNDERING

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Money laundering occurs when a person carries out an act that is aimed at frustrating the identification of the origin, the tracing or the forfeiture of assets which he knows or must assume originate from a crime.

CLASQUIN, Agencies and Employees are strictly forbidden from participating in or facilitating a money laundering transaction.

CLASQUIN, Agencies and Employees shall only conduct legitimate business activities and shall not accept or handle cash or other assets that they have reason to suspect are the proceeds of a crime.

## ANTITRUST LAWS

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CLASQUIN complies with the applicable competition regulations (also known as “Antitrust Laws”) at any time, regardless of the location.

Violations of Antitrust Laws are strictly penalised by law, including in many countries by criminal sanctions.

Agencies and Employees receiving a request for information from a public authority, including government investigations and audits, must immediately report at [ethics@clasquin.com](mailto:ethics@clasquin.com) who will address the subject with the support of the Group Corporate Legal Competition Team.

In case of a “dawn raid” or unannounced inspection initiated by a competition authority, promptly contact [ethics@clasquin.com](mailto:ethics@clasquin.com) who will address the subject with the support of the Group Corporate Legal Competition Team.

A key area of illegal conduct is agreements with other businesses whose purpose is to restrain competition (“collusion”). These include, for example, collusion with a competitor concerning:

- Agreements regarding any element of the price, for example rates, discounts, terms of payment, known as “price fixing”;
- Agreements not to open up competing services or to withdraw competing services, or agreements not to approach competitors’ customers, known as “market sharing”.

Exchanging commercially sensitive information with competitors, for example prices, costs, product launches or business plans, volumes, market share data is illegal and strictly prohibited. Note that public announcements of future price increases (“signalling”) through websites or press releases may also be regarded as anti-competitive.

A breach of Antitrust Laws may also arise from the abuse of a dominant position. A dominant position is legal and exists where a company has such a strong market presence that it can behave independently of competitors and customers. Abuse of a dominant position is illegal and arises from the use of this position to exploit customers or exclude competitors. In most markets, CLASQUIN faces enough competition that these issues would not arise, but care should be taken in those markets where CLASQUIN holds high market shares. For instance, under European Union law, it is very unlikely that a company will be considered as dominant if its market shares on the trade are below 40%.

Note: although special rules may apply in relation to consortia or conferences, including voluntary discussion agreements, you must still ensure full compliance with Antitrust Laws. For further guidance on this matter, please contact [ethics@clasquin.com](mailto:ethics@clasquin.com) who will address the subject with the support of the Group Corporate Legal Competition Team.

## BUSINESS AND FINANCIAL RECORDS

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The accuracy and maintenance of CLASQUIN's business and financial records is crucial and must be ensured.

In this regard, all Employees must:

- Always record and classify transactions in the proper accounting period and in the appropriate account and department;
- Not distort the true nature of any transaction;
- Not falsify any document;
- Not enable another person's efforts to evade taxes, launder money, or violate other laws;
- Always support estimates and accruals with appropriate documentation;
- Maintain records for the minimum period of 10 (ten) years or higher if required by local law;
- Maintain the requested documents and not dispose, alter, delete, or destroy any information or document that may be relevant to an investigation and/or subject to a litigation hold.

## CONTRACTS

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Each Employee must obtain all appropriate approvals before executing, modifying, or amending any contract.

For the purpose of this section, "contract" includes, but is not limited to, contracts with clients, contracts with suppliers, non-disclosure agreements. Should Employees have any questions or need any advice on any contract, they should liaise with the CLASQUIN Legal Team.

## CONFIDENTIAL INFORMATION, DATA PROTECTION AND PRIVACY, AND ELECTRONIC DEVICES

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### CONFIDENTIAL INFORMATION

Employees must safeguard all of their Confidential Information as well as any Confidential Information received from CLASQUIN's or Agencies' customers, suppliers and any other third parties.

Failure to do so could result in a breach of obligations arising under contracts or laws protecting business secrets, data protection, and privacy.

Confidential Information must not in any case be disclosed to anyone outside of CLASQUIN and Agencies, including to family and friends, except if legally required.

Confidential Information must not be shared with others inside CLASQUIN or Agencies except on a "need-to-know" basis. All Employees are obliged to protect Confidential Information, even after employment or business ends.

### DATA PROTECTION AND PRIVACY

CLASQUIN respects and protects the privacy of its Employees, customers, and business partners, processing the Personal Data in accordance with the requirements established by applicable data protection laws and regulations. It notably ensures the effectiveness of the data protection rights of the persons for whom the Personal Data are processed.

Personal Data shall be processed fairly and lawfully and for specified and legitimate purposes. CLASQUIN has adopted appropriate technical and organisational security measures to protect the Personal Data it processes and stores and takes precautions to prevent unauthorised disclosure.

CLASQUIN regularly raises awareness among its Employees on data protection issues.

Employees shall be aware of their duties with respect to Personal Data and confidentiality, and must comply with CLASQUIN's data protection policy,

## **ELECTRONIC DEVICES**

CLASQUIN and Agencies may provide their Employees with Electronic Devices for professional purposes. Employees must only use such devices for their intended purposes and shall restrain themselves from using them for a personal goal. Electronic Devices must be used in accordance with CLASQUIN and Agencies' policies.

CLASQUIN or Agencies are entitled to monitor from time to time the use of Electronic Devices within the limits of the law, which include any data, information, Confidential Information and Personal Data stored on such devices.

## **SOCIAL MEDIA AND PUBLIC SPEAKING**

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### **BUSINESS USE OF SOCIAL MEDIA**

CLASQUIN encourages all Employees to participate responsibly and professionally in CLASQUIN Social Media as a means of generating interest in CLASQUIN's services and creating business opportunities. CLASQUIN encourages Employees to use the official CLASQUIN pages on Social Media. Every Employee can share and comment on any posts made on the official CLASQUIN pages on Social Media.

If any Employee's work duties require them to speak on behalf of CLASQUIN in a Social Media environment, the Employee must seek approval for the contents of such communication from the CLASQUIN Marketing Department. In cases where this is to be frequent, said Employee may be asked to undertake training or guidance on Social Media for business use. The Employee must not respond themselves without prior written approval to do so.

When using CLASQUIN Social Media, Employees should not post, or express a viewpoint on another's post, such as by "liking" a Facebook post, anything that CLASQUIN or CLASQUIN's business partners would find offensive, including racism, ethnic slurs, sexist comments, discriminatory comments, profanity, abusive language or obscenity, or statements that are maliciously false.

Employees having questions about their responsibilities relating to the use of Social Media shall refer to the Social Media Policy published on CLASQUIN's intranet or contact CLASQUIN Marketing Department.

### **PUBLIC SPEAKING AND MEDIA ENGAGEMENT**

CLASQUIN recognises that Employees from time to time may wish to take part in public-speaking events and that these activities can help build relations with external parties and promote CLASQUIN and its services. Delivering a speech at a conference also fall within skill sets that some Employees are encouraged to develop.

Any speech at a public event where an Employee identifies as CLASQUIN and any comment to the media can be construed as a representation of CLASQUIN. Therefore, CLASQUIN needs to ensure that only appropriate information is disclosed in the public domain and that such representations are made in line with CLASQUIN's policy, to a standard which benefits the CLASQUIN brand and in a coordinated way across our global business.

Employees are therefore required to inform the CLASQUIN Communication Department of any public-speaking or media engagement opportunity, prior to accepting. These requests are reviewed and either validated, queried or rejected. In some cases, fact-checking or training and preparation is required before the green light to proceed is given.

## GLOSSARY

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Where appropriate words in the singular shall include the plural and vice versa. Unless the context otherwise requires, a reference to masculine shall include a reference to feminine.

### A

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#### **ACTIVE BRIBERY**

means any action to, directly or indirectly, offer, promise or give to any person of the private sector an undue advantage, in order to cause that person to carry out or to fail to carry out an act in connection with his professional or commercial activity which is contrary to his duty or dependent on his discretion.

#### **AGENCY(IES)**

means (i) CLASQUIN worldwide agencies while acting for and on behalf of CLASQUIN and includes, whenever applicable CLASQUIN branch offices, CLASQUIN subsidiaries and affiliates.

### C

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#### **CLASQUIN**

means CLASQUIN, located at 235 cours Lafayette, 69006, Lyon, France.

#### **CLASQUIN SOCIAL MEDIA**

means Social Media but where in addition an Employee also reveals their Employee status with CLASQUIN, whether directly, such as making a statement or reference to CLASQUIN, or indirectly, such as by uploading a photograph that identifies CLASQUIN, for example with the CLASQUIN logo in the background.

#### **CODE**

means the latest version of CLASQUIN's Code of Business Conduct published on CLASQUIN's website.

#### **CONFIDENTIAL INFORMATION**

means all non- public information in CLASQUIN's or Agencies' possession related to business, including, but not limited to, contracts, pricing information, marketing plans, trade volumes, customers' identities, trade secrets and any other information of commercial value to any other person, communicated by any means, including oral and/or electronic means, whether or not marked, designated or otherwise identified as "confidential".

#### **CONFLICT OF INTEREST**

means a situation when an Employee conducting business for and/or on behalf of CLASQUIN has private interests that may interfere with the interests of CLASQUIN in such a way that creates a risk that his decisions could be affected by the private interest or otherwise could alter the performance of his duties on behalf of CLASQUIN.

#### **CORRUPTION**

means the action of offering, promising or giving a Government Official, directly or indirectly, an undue advantage, in order to cause that Government Official to carry out or to fail to carry out an act in connection with his official activity which is contrary to his duty or dependent on his discretion.

### E

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#### **ELECTRONIC DEVICE(S)**

means any electronic equipment mainly dedicated to communicating, processing and transferring information (which may include Confidential Information and Personal Data) in a professional environment. Such devices include, but are not limited to, laptop computers, desktop computers, servers, mobile phones, tablets, mobile devices' SIM cards, static or removable storage device, as well as any software installed or stored onto such devices.

#### **EMPLOYEE(S)**

means CLASQUIN's and Agencies' employees, representatives, officers, and directors.



## **F**

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### **FACILITATION PAYMENT**

means any payments or advantages of any kind made with the purpose of expediting or facilitating the performance by a Government Official of a routine governmental action.

## **G**

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### **GIFTS**

means anything of value in relation to CLASQUIN business and "Corporate Hospitality" means any event CLASQUIN or Agencies host or Employees attend for business related purposes. Common examples include reasonable priced meals, sporting events, theatrical performances and educational events for business related purposes.

### **GOVERNMENT OFFICIAL**

means a person: (i) serving with, employed by or acting as an agent of any agency or entity of the national, state or municipal governments of any country; (ii) serving with, employed by or acting as an agent of any public international organisation (such as the World Bank or the United Nations); (iii) working in any government-owned or government-controlled commercial enterprise; (iv) working in a political party; (v) running as a candidate for a political office.

## **M**

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### **MISCONDUCT**

means any unlawful or improper behaviour that is undertaken by an Employee, including a breach of the Code.

## **P**

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### **PASSIVE BRIBERY**

means the action of an Employee, directly or indirectly, to solicit, accept, or receive an undue advantage for his own benefit or for the benefit of a third person for the commission or omission of an act in connection with his professional or commercial activity which is contrary to his duty or dependent on his discretion.

### **PERSONAL DATA**

means any information or data that relates to an identified or identifiable natural person. Personal Data is each piece of information related to such person, regardless of the form in which it is expressed and the format of the information (storage media, paper, tape, film, electronic media, etc.). For the purpose of this Policy, legal entities shall be excluded of its scope, unless otherwise provided under local data protection law. Personal Data covers any information that relates to an identifiable person. There are different ways in which a person can be considered 'identifiable'. A person's full name is a direct identifier. Other combined information may also be sufficient to identify a person. Personal Data may notably relate, but is not limited to name, date of birth, address; personal and professional email address and telephone number, regardless if it is used for personal or professional purposes; cargo description associated with name or contact details of the parties to the contract of carriage; geolocalisation of customers' containers; employees' professional details, job position, badge number; customers' contact details or customers' financial details or any other information required for credit checks; IP address or a device serial number.

## **S**

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### **SOCIAL MEDIA**

means the private or personal use of websites and applications used to communicate with other users, or to find people with similar interests to one's own, including, but not limited to, Facebook and LinkedIn.

