

CROWLEY VENDOR CODE OF CONDUCT

Crowley aspires to be an ethical and socially responsible company. While Crowley understands that vendors are independent entities, the business practices and actions of a vendor may, at times, impact Crowley's image or reputation in the community. This Vendor Code of Conduct applies to all vendors that produce and/or provide goods and services for Crowley or any of its subsidiaries, divisions, affiliates or agents. The purpose of this Code is to encourage ethical and socially responsible practices on the part of Crowley's vendors in a manner consistent with Crowley's core values.

While Crowley recognizes that there are different legal and cultural environments in which vendors operate throughout the world, this Code sets forth the basic requirements that vendors shall embrace and adhere to when conducting business with and/or on behalf of Crowley.

I. Compliance with Laws

Vendors shall operate in full compliance with the laws of their respective countries and with all other applicable laws, rules and regulations (including, but not limited to, laws on trade control, fair competition, environmental, labor and anti-corruption).

II. Safety, Security, Environment, and Quality

Vendors shall comply with all applicable laws and regulations. Where such requirements are less stringent than Crowley's own, vendors are strongly encouraged to meet the standards outlined in Crowley's Operational Excellence Management System manual attached hereto as an addendum.

III. Risk Management and Insurance

Vendors shall comply with all of Crowley's insurance requirements and ensure continuity of such insurance for the duration of the work or contract. Safety is Crowley's #1 core value. When accidents do occur on or involve Crowley's equipment, premises, offices, personnel, or vessels, vendors shall promptly report the accident to Crowley's Risk Management Department.

IV. Business Practices

Vendors shall conduct their business interactions and activities in accordance with their obligations under their specific agreements with Crowley. In addition, vendors shall maintain accurate business and financial records and comply with all applicable laws and regulations. Vendors shall also protect and responsibly use both the physical and intellectual assets of Crowley including premises, vessels, equipment, and information systems when authorized by Crowley to use such assets.

V. Ethical Principles

Vendors shall be committed in the conduct of their business to a set of ethical standards, which include, but are by no means limited to honesty, integrity, trustworthiness, respect for the unique intrinsic value of each human being, and avoidance of appearance of improprieties and conflicts of interest.

VI. Drugs and Alcohol

Vendors are prohibited the use of illegal drugs, controlled substances, or alcohol and the misuse of legitimate drugs in any forms or manner while on Crowley premises and assets, or while performing duties on behalf of Crowley outside of Company premises and assets.

VII. Firearms, Explosives, and Weapons

Vendors are prohibited the use or possession of firearms, explosives and other weapons while performing Crowley business or related duties.

VIII. Labor

a. Child labor

Vendors shall employ only workers who meet the applicable minimum legal age. Vendors must also comply with all other applicable child labor laws.

b. Contract labor requirements (if applicable)

Vendors that recruit or employ foreign contract workers shall ensure that these workers are treated fairly and on an equal basis with its local contract workers.

c. Discrimination

Vendors shall employ workers on the basis of their ability to do the job, not on the basis of their personal characteristics or beliefs (e.g., race, color, gender, nationality, religion, age, maternity, marital status, indigenous status, social origin, disability, sexual orientation, membership in workers' organizations including unions, or political affiliation).

d. Employee grievances

Vendor employees shall be able to voice grievances of unlawful behavior without fear of reprisal.

e. Voluntary labor

Vendors shall not use any involuntary labor of any kind, including prison labor, debt bondage or forced labor by governments.

f. Freedom of association and the right to collective bargaining

Vendors shall not interfere with workers who wish to lawfully and peacefully associate, organize or bargain collectively. The decision whether or not to do so should be made solely by the workers.

g. Humane treatment

Vendors shall treat all workers with respect and dignity. Vendors shall not use corporal punishment or any other form of physical or psychological coercion (e.g., non-physical abuse, including threats of violence, sexual harassment, screaming or other verbal abuse).

h. Wages & benefits

Vendors shall pay wages and overtime premiums in compliance with all applicable laws. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater.

i. Working hours

Vendors shall set working hours in compliance with all applicable laws. While it is understood that overtime is often required in garment production, vendors shall carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions.

j. Employee Records

Vendors shall keep employee and contract worker records in accordance with all applicable laws.

IX. Working Conditions

a. Occupational health and safety

Vendors shall comply with all applicable laws and regulations regarding working conditions and shall provide workers with a safe and healthy environment.

Monitoring, Enforcement and Compliance Management

It is the responsibility of Crowley's vendor to ensure compliance with this Code and to inform its Crowley contact if and when a situation develops that causes the vendor to operate in violation of this Code. In addition to any other rights Crowley may have under its agreement with vendor, Crowley may request the removal of any representative of vendor who behaves in a manner that is unlawful or inconsistent with this Code or any Crowley policy, and/or require the vendor to implement a corrective action plan. If corrective action is advised but not taken, Crowley may elect to take its business elsewhere. Crowley encourages vendors to define and implement a policy for social accountability and to adopt or establish a management system to ensure that the requirements of this Code can be met in a consistent way.

Ethics Hotline

Evidence of questionable behavior can be communicated confidentially to Crowley via its Ethics Hotline by any vendor employee. The phone line and website are manned by a third party company, Ethics Point, and available in both English and Spanish. Ethics Point shall document all reports submitted and forward them to Crowley's Internal Audit Department. Individuals filing complaints may remain anonymous if they choose. The Crowley Internal Audit Department, on a completely confidential basis, will be responsible for ensuring all questions are answered and reports of violation are investigated.

To file a report, have questions answered online or find a toll free number for foreign locations, individuals may visit the following websites:

English - www.Crowley-Eng.EthicsPoint.com
Spanish - www.Crowley-Esp.EthicsPoint.com

To call toll free within the U.S., Puerto Rico, U.S. Virgin Islands or Canada. dial 1 (888)371-4682.