

Sustainable Procurement Policy

At Crowley, we are driven by our values and purpose - our unwavering commitment to Sustainability, Integrity, and Drive-- bravely advancing what's possible to elevate people and planet. Our commitment to decarbonization, advancement of diversity, equity and inclusion, and governance with integrity are not just the right thing to do for the planet, but the right thing for our business.

Crowley's Commitment to Sustainability

Crowley has committed to net-zero greenhouse gas emissions across all scopes by 2050, pursuing a path aligned with the latest climate science to limit global warming to 1.5 degrees Celsius. To reach this target, Crowley estimates that it will reduce emissions by 4.2 million metric tons of greenhouse gases per year, or the equivalent of removing more than 900,000 cars from the road every year.

We are committed to social impact and strive for sustainability across every function, **including sourcing and procurement.**

Through this procurement policy, we commit to make our operations more sustainable by:

- Upholding the laws and regulations of the respective countries we operate in
- Endorsing highest standards of economic, social, ethical, and environmental practices
- Identifying and moderating risks associated with our procurement process
- Communicating the policy with stakeholders (internal and external) and raising awareness among our suppliers
- Ensuring procurement decisions consider environmental, social, and economic factors and include consideration of whole life cost, energy consumption and disposal considerations.
- Following "reduce, rethink, re use and re cycle" best practice.
- Encouraging small and medium enterprises (SMEs) and local suppliers to bid for suitable work.
- Ensuring that staff (and their agents) involved in procurement decisions and contract management are properly and regularly appraised of and trained in sustainable procurement best practice.
- Collaborating and influencing the market to develop innovative, sustainable solutions in our value chain
- Developing long-term savings through whole life cycle costing

As part of our sustainable procurement approach, and in accordance with our sustainability commitments, we strive to:

- Work with our suppliers that deliver quality, cost-effective and responsible products/services that help us achieve value for money while enabling positive environmental and social impacts.
- Ensure that the minimum business standards in our Supplier Code of Conduct are communicated to our suppliers and that they attest their compliance.
- Ensure supplier risks are identified and mitigation measures established during the selection process, taking into consideration reputational, financial, governance, economic, social, and environmental risks.
- Work with suppliers to encourage sustainable products, including environmentally friendly technologies.
- Monitor performance of higher-risk suppliers, where relevant; and,
- Report our progress on the implementation of our sustainable procurement commitments.

In accordance with our commitment to the highest science-based standards, we also expect our suppliers to aspire to the same standards in their business operations, including but not limited to:

Environment:

Sustainable Practices

- Measures implemented and documented to minimize the impact of business activities on the environment by
 - Reduce or avoid greenhouse gases and other emissions,
 - Minimize the use of hazardous substances
 - Responsibly manage waste and disposal
 - Conserve nonrenewable natural resources
 - Develop and publish progress toward environmental goals and initiatives
 - Engage employees in sustainability efforts

Compliance

- Persons with responsibility for environmental issues shall be designated who will establish, implement, and further develop the company's environmental position. A corresponding environmental management system shall be implemented to ensure compliance with applicable environmental laws and regulations in respective countries/jurisdiction.
- All required environmental permits, registrations, and licenses must have been obtained and the associated requirements must be met.
- Environmental reporting shall comply with the relevant legal and regulatory requirements.

Prohibited Equipment and Services

- Our suppliers must represent and warrant that the goods or services provided shall not include covered telecommunications equipment or services from prohibited Chinese

sources as defined in Section 889 of the National Defense Authorization Act for Fiscal Year 2019 and the rules and regulations promulgated thereunder.

- Our suppliers represent and warrant that all goods provided shall not contain asbestos and are in compliance with SOLAS Regulation II-1/3-5.
- Our suppliers do not supply Crowley with products containing chemicals as defined in Article 3, Paragraph 1(a), and Annex A of the Stockholm Convention on Persistent Organic Pollutants of May 23, 2001.
- Furthermore, our business partners ensure that products supplied to Crowley have either not been manufactured with mercury or mercury compounds, or that mercury waste has been properly treated.

Waste, Wastewater and Emissions

- Our suppliers have systems in place to ensure safe, appropriate management of emissions, waste, and wastewater, particularly regarding disposal, transportation, storage, and recycling.
- Waste, wastewater, or emissions that could have a negative impact on human health or the environment must be appropriately handled, collected, controlled, and treated prior to disposal, release or return to the environment.
- Wastewater disposal shall be carried out by authorized plants. Traceability of the wastewater disposal shall be guaranteed. A contingency plan with appropriate processes and trained personnel shall be in place so that suitable steps can be taken to avert danger in the event of a threat to the environment and groundwater.

Energy

- Energy-related services, including energy efficiency, energy use, and energy consumption, must be continuously improved through appropriate energy management and conscious action as well as by raising awareness among employees.

Product Stewardship

- Product stewardship means complying with the legal and normative requirements for the product and defining and communicating the requirements for handling the product.
- Commit to the use and development of climate-friendly products.

Business Ethics:

Integrity

- All forms of corruption, bribery, extortion, embezzlement, and money laundering are prohibited and must not be practiced or tolerated by the supplier.
- Suppliers may not promise, grant, offer, accept, or demand any unlawful advantages or benefits, particularly in business transactions with third parties or public officials, or be involved in any other unlawful attempts to influence business or government relations. They are also prohibited from making payments to or granting other advantages to an

individual, a company or a public official with the objective of influencing decision-making processes.

- Suppliers shall not influence Crowley employees in their decisions to award contracts by giving them or related parties unlawful gifts.

Fair Competition

- Our business partners shall engage in fair competition and observe and uphold all antitrust laws in force.
- Our business partners shall ensure that they do not engage in any anticompetitive practices, which include, but are not limited to, price fixing and market sharing agreements.

Conflict Minerals

- Suppliers shall guarantee responsible procurement of minerals and ensure that no products containing metals whose base minerals or derivatives originate from a conflict region where they contribute directly or indirectly to the funding or support of armed groups or to human rights violations are supplied to Crowley.

Animal Welfare

- Animals must be treated respectfully and experiments on animals kept to an absolute minimum. Where no appropriate alternative methods are available, the number of animals needed should be kept to a minimum. In addition, the suffering and stress of the animals used must be kept to a minimum.

Compliance with Trade Regulations

- All export and import control regulations as well as all other applicable commercial and customs regulations, particularly the laws on sanction programs and economic embargoes in force, must be complied with.
- Obey all relevant international and domestic laws regarding ethical business practices
- Demonstrate existence of procedures to prevent:
 - Money laundering
 - Fraud, bribery, corruption, extortion
 - Conflicts of interest
 - Data security issues

Labor and Human Rights:

Freely Chosen Employment

- We do not tolerate forced labor, involuntary prison labor or any other unlawful obligation of workers, any form of slave labor, serfdom, bonded labor, or human trafficking in either our own business area or within the area of influence of our suppliers. Consequently, employees are free to terminate their employment relationship subject to the applicable period of notice. Any coercive measures such as withholding passports, other identity documents or work permits are not permitted.

Prohibition of Child labor

- Child labor and any form of exploitation of children are prohibited at Sartorius and in our value chain. The definition of child labor is based on the principles of the United Nations Global Compact and the International Labor Organization (ILO). If a local law prescribes a higher legal minimum age for workers or longer compulsory schooling, the higher age shall apply. The special need to protect young employees is respected.

Fair Treatment and Equal Opportunity

- Prohibit unlawful discrimination and harassment to provide a safe and inclusive work environment
- Provide a working environment in which employees are treated fairly and without discrimination and inhumane treatment or threats of inhumane treatment are not tolerated. We do not accept physical punishment, psychological or physical duress, threats, insults, or coercion, including (sexual) harassment and (sexual) abuse.
- Promote equal treatment of employees and prevent discriminatory behavior. Particularly in hiring and employing human resources, business partners must not disadvantage, treat preferentially, or exclude anyone based on gender, national, ethnic, or social origin, skin color, ideology, religion, age, disability, appearance, sexual preferences and identity, political opinion, or marital status.

Community Development:

- Provide employees with a living wage
- Partner with local companies to improve the educational, cultural, economic, and social well-being of communities in which they operate

Continuous Improvement

- Set and adjust performance management systems to capture, analyze, and monitor the sustainable procurement performance metrics. Progress is monitored against goals and adjustments are made to improve performance.
- We understand that procurement performance improvement is a continuous process and recognize the contribution of our suppliers in our journey to become more sustainable.

For detailed guidelines on supplier sustainability, please refer to our [Supplier Code of Conduct](#).

For any grievances or suggestions regarding sustainable procurement practices, please write to procurementleadership@crowley.com. Strict confidentiality will be maintained.