

### "WE STRIVE TO ENSURE THAT OUR EMPLOYEES ARE OFFERED LONG-TERM CAREER PROSPECTS IN SAFE AND HEALTHY **WORKING CONDITIONS."**



As one of the world's geographically widest logistics and supply chain provider, MEDLOG continues its growth facilitating logistics efficiency for the benefit of its customers.

MEDLOG is continuously building a culture of compliance and strives to act in accordance with high ethical principles as set forth in this Code of Business Conduct.

With a presence in a great number of countries, MEDLOG is committed to undertake business with responsibility and integrity in line with its core values.

Sincerely,

**Giuseppe Prudente** 

MEDLOG's Administrator President

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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.



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**SOCIAL MEDIA AND PUBLIC SPEAKING** 

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.

CODE means the latest version of MEDLOG's Code of Business Conduct.

**CONFIDENTIAL INFORMATION** means all non-public information in MEDLOG's possession related to business, including, but not limited to, contracts, pricing information, marketing plans, trade volumes, customer's identities, vessels or any transportation vehicles' operations and technical specifications, 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 MEDLOG has private interests that may interfere with the interests of MEDLOG 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 MEDLOG.

**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.

**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 MEDLOG's employees, representatives, officers, and directors.

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.

GIFT(S) means anything of value in relation to MEDLOG's business and **CORPORATE HOSPITALITY** means any event MEDLOG hosts or Employees attend for business related purposes. Common examples include reasonably 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 governmentcontrolled commercial enterprise; (iv) working in a political party; (v) running as a candidate for a political office.

INTELLECTUAL PROPERTY RIGHTS means all intellectual property rights, including but not limited to, trademarks and service marks, business names and domain names, goodwill and the right to sue for passing off or unfair competition, rights in designs, rights in computer software, database rights, rights to use, and protect the confidentiality of, Confidential Information (including know-how and trade secrets), in each case whether registered or unregistered and including all applications and rights to apply for and be granted, renewals or extensions of, and rights to claim priority from, such rights and all similar or equivalent rights or forms of protection which subsist or will subsist now or in the future in any part of the world.

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

MEDLOG means Medlog SA, located at 12-14 Chemin Rieu, 1208 Geneva, Switzerland, and any of its affiliates and subsidiaries that have adopted the Code. A list including the affiliates and subsidiaries that have adopted the Code is maintained by Medlog SA.

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

MSC means MSC Mediterranean Shipping Company SA, located at 12-14 Chemin Rieu. 1208 Geneva. Switzerland.

background.

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 Code, 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.

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.



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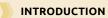
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### **MEDLOG'S VALUES**

As MSC's logistics arm, MEDLOG shares the MSC Group values. They constitute the cornerstones of the company and support MEDLOG's vision, shape MEDLOG's culture and establish MEDLOG's future direction. These values should also quide the conduct of all Employees in their interactions with each other.



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 MEDLOG.



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.



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



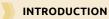
We believe that each person brings unique value. We develop authentic relationships built on ethics, respect and team spirit. We truly care about the satisfaction and loyalty of our customers and employees.



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.

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### **OBJECTIVE OF THE CODE**

As an intermodal transport and logistics service provider, MEDLOG earns its reputation and trust everyday 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 MEDLOG may adopt for the purpose of implementing the Code's principles as well as other policies.

MEDLOG also reserves the right to amend the Code from time to time. Employees should keep themselves informed and aware of any updates.

Employees are free to address any question on the Code and its implementation at ethic@medlog.com

### SCOPE OF THE CODE

The Code is a guideline to help Employees to run ethical business. The implementation of this Code is of the highest priority for MEDLOG, and MEDLOG expects Employees to adhere to it. MEDLOG reserves its right to carry internal audits in order to ensure Employees' compliance with the standards set forth in the Code with the assistance of any relevant departments or external auditors, as appropriate.

MEDLOG encourages MEDLOG's subsidiaries and affiliates 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 <a href="mailto:ethic@medlog.com">ethic@medlog.com</a> 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
- 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 Employees under their supervision of the principles laid down in the Code
- Stop any conduct breaching the Code and report the conduct to ethic@medlog.com

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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 MEDLOG'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 ethic@medlog.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 MEDLOG 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 unsure of the answer, then you should contact ethic@medlog.com for further guidance.

### REPORTING MISCONDUCT

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

Consistent with MEDLOG's values, the ability to speak up is a cornerstone for building an open and accountable workplace culture. Employees have at their disposal an online tool called "MSC Speak-Up Line" to report any Misconduct at any time.

Any Misconduct shall be reported expeditiously. Employees are strongly encouraged to use the MSC Speak-Up Line and, alternatively, report any Misconduct through <a href="mailto:ethic@medlog.com">ethic@medlog.com</a>.

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.

MEDLOG 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.



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## **ENVIRONMENT**

MEDLOG strives to continuously improve its practices and procedures to further minimize its environmental impacts and externalities on lands, populations, biodiversity, and ecosystems. Additionally, MEDLOG is strongly committed to offering its customers and business partners technologically advanced and efficient multimodal logistics solutions.

Priority environmental topics at MEDLOG include, but are not limited to, greenhouse gas emissions reduction, pollution prevention, energy and operational efficiency, responsible use of natural resources, sustainable waste management, sustainable water use and noise reduction.

MEDLOG complies with all applicable laws, regulations, standards and other relevant requirements for environmental protection such as site permits, vehicle emission requirements and standards in the countries in which it operates, as well as applicable certifications and permits required in connection with cross-border transport of goods.

In line with the above, each Employee should be open-minded about innovation and change. Managers are encouraged to listen to Employees' ideas about how to reduce resource consumption and enhance MEDLOG's environmental performance.



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### WORKING CONDITIONS

MEDLOG strictly complies with all applicable national laws, local requirements and/or relevant prevailing local industrial 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.

### **DIVERSITY & NON-DISCRIMINATION**

Consistent with its core values, MEDLOG supports equal employment opportunities by ensuring that hiring and employment practices and procedures are based on the grounds of merit and work-related abilities. MEDLOG respects each person's individuality and does not tolerate discrimination based on any ground, such as sex, race, colour, religion, language, ethnic origin, age, disability, political or ideological affiliation, trade union membership, marital status or family responsibilities, sexual orientation or gender identity. Special attention is paid to vulnerable categories of workers as expected by the international community.

MEDLOG 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.

### MUTUAL RESPECT AND FAIR TREATMENT

MEDLOG 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.

### FORCED LABOUR AND MODERN SLAVERY

MEDLOG adheres to, and supports, internationally recognized human rights principles and labour standards. In this respect, MEDLOG prohibits a person's economic and social exploitation by another for personal and/or commercial gain, forced and compulsory/involuntary labour as defined in the ILO C029-Forced Labour Convention, 1930 (No. 29), the use of prison labour and any forms of slavery or servitude, including bondage labour and human trafficking. Special attention is paid to vulnerable categories of workers.



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### CHILD LABOUR AND PROTECTION OF YOUNG WORKERS

MEDLOG strictly prohibits the use of child labour and adheres to the ILO C138-Minimum Age Convention, 1973 (No. 138). The minimum age for work should not be under 15 years old, the age for finishing compulsory schooling or the national legal working age.

MEDLOG supports the ILO C182-Worst Forms of Child Labour Convention, 1999 (No. 182) and strictly complies with applicable laws, regulations and requirements related to what constitutes acceptable or unacceptable work for young workers at different ages and stages of their development. MEDLOG requires that Employees under the age of 18 years old do not undertake any work which is likely to jeopardize their physical, mental or moral health or safety, including "night work" as defined in accordance with applicable national law and standards.

When differences or conflicts in standards arise. MEDLOG applies the highest standards. MEDLOG supports and invests in vocational training programmes in different parts of the world to unlock the potential of young people. In line with the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration-5th Edition, 2017), in offering such opportunities, MEDLOG acts in compliance with applicable national laws, regulations and requirements, ensuring the respect of children's rights to attend and/or complete compulsory schooling.

### **HARASSMENT** AND OTHER ABUSIVE CONDUCT

MEDLOG 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 MEDLOG's property or the property of another person, or any other behaviour that causes others to feel unsafe in MEDLOG's workplace.

### FREEDOM OF ASSOCIATION

MEDLOG recognises the right to 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 of the countries in which MEDLOG operates.

### COMMUNITY AND STAKEHOLDERS ENGAGEMENT

With a view to contributing to inclusive positive social and economic impacts in the long term, MEDLOG is strongly committed to conducting a responsible business that respects the fundamental rights of local communities, including those of indigenous peoples as well as those of other vulnerable and disadvantaged groups.

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### **SUPPORTING HUMAN RIGHTS**

MEDLOG encourages Employees to support socially responsible practices that can contribute to the progressive realisation of human rights, when deemed appropriate and in line with international standards and/or national development plans, through:

- country or region-specific initiatives and philanthropy
- public policy engagement and advocacy
- partnerships and collective actions

MEDLOG's contributions to humanitarian relief actions, including through core business activities, adhere to and comply with relevant international regulations.

### **OCCUPATIONAL HEALTH AND SAFETY**

MEDLOG is committed to prevent any loss of life and unnecessary risk to human health in all its business endeavours and operations. To ensure a safe and healthy environment to its Employees, MEDLOG develops, maintains and applies effective and appropriate health and safety management systems, policies, practices and procedures in accordance with relevant national laws, regulations and requirements as well as applicable standards and guidelines developed by the International Organization for Standardization (ISO).

These include, but are not limited to:

- investments in latest available and/or innovative technologies to further reduce risks to people and increase safety in operations
- appropriate handling, disposal and management of hazard, dangerous goods and chemicals to which the personnel may be exposed
- risk assessments and incident investigation as a basis for the continuous improvement of existing practices and procedures

MEDLOG is committed to provide training on Occupational Health and Safety compliance and on awareness-raising of first-aid interventions and tools, proper use of machineries and equipment, including Personal Protective Equipment (PPE). MEDLOG ensures that Employment contracts as well Health and Safety guidelines and requirements are well understood by its Employees.

Each Employee is also responsible for his own health and safety. Therefore, each Employee has the right to remove himself from dangerous situations or operations when there is an imminent and serious danger to his safety and health. MEDLOG encourages Employees' consultations and participation in health and safety matters as part of its efforts to mitigate and reduce risks associated to its operations.

The use of alcohol and drugs by an Employee or work under their influence is not allowed at any time while performing his duties for and/or on behalf of MEDLOG.

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## RELATIONSHIPS WITH PUBLIC STAKEHOLDERS

MEDLOG invests extensively in the development of intermodal and logistics supply chains both at regional and global levels by improving existing facilities and/or by developing strategic networks and trade corridors.

To this end, MEDLOG explores and creates synergies with a wide range of local and international stakeholders, including financial institutions such as Multilateral Development Banks (MDBs) and public stakeholders.

In this respect and in line with its obligations, MEDLOG is committed to:

- develop and implement projects in line with national development plans and in compliance with applicable legislation, rules, and regulations
- use and manage financial contributions, grants of funding from public stakeholders with transparency, integrity, and accountability.



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## **ANTI-BRIBERY**

While conducting business anywhere in the world, MEDLOG is committed to undertake business fairly and to uphold all applicable anti-bribery laws, including the Swiss Penal Code and, where applicable, the US Foreign Corrupt Practices Act and the UK Bribery Act 2010.

MEDLOG 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. MEDLOG 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 MEDLOG's Anti-Bribery Policy.

Should Employees be asked to participate in Facilitation Payments they must actively refuse the payment. The fact that the payment was first proposed by the other party does not make the conduct lawful. MEDLOG has a zero-tolerance policy regarding Facilitation Payments, except when the health and safety of an Employee is at stake.

While Gifts offered or received might be permitted under certain circumstances, it is very easy to cross the line from modest value Gifts and Corporate Hospitality to Corruption, Active or Passive Bribery. Modest value Gifts, which are allowed under MEDLOG's policy, include any MEDLOG's promotional Gift. MEDLOG will not tolerate the payment of bribes to a Government Official, including those disguised as Gifts.

Gifts and Corporate Hospitality received or given by any Employee must be properly reported and recorded.



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### **CONFLICT OF INTEREST**

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 vendor, a customer or a competitor), in which the Employee or the Employee's 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. All Employees are requested to disclose any potential or actual Conflict of Interest in accordance with relevant disclosure procedures. Employees are responsible for updating the information disclosed to ensure such disclosure is accurate and true at all times.

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.



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# **SANCTIONS REGULATIONS**

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

MEDLOG complies with all applicable sanctions laws and regulations in its business dealings worldwide, including Swiss and European Union sanctions. All Employees must comply with applicable sanctions, regardless of the trade or the commodity transported.



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# **MONEY LAUNDERING**

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.

Employees are strictly forbidden from participating in or facilitating a money laundering transaction.

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.



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## **FAIR COMPETITION**

MEDLOG competes fairly and abides by antitrust and fair competition laws in all locations where it operates. Employees are aware that violations of competition laws are strictly penalised by law, including in many countries by criminal sanctions.

Employees must not initiate, participate, or support anticompetitive agreements or conducts with competitors whose purpose is to restrain competition on the market. Exchanging commercially sensitive information with competitors, for example prices, costs, volumes customer lists, marketing plans or other strategic data, is illegal and strictly prohibited.

In particular, Employees must not discuss or agree any of the following, directly or indirectly, with competitors:

- the price or terms of sale of MEDLOG's services
- the co-ordination or allocation of bids or quotes

- the division or allocation of territories, markets or customers
- the boycott of a company or the refusal to deal with certain suppliers or customers for improper reasons

A breach of competition laws may also arise from the abuse of a dominant position. In most markets, MEDLOG faces strong enough competition that this issue would not arise, but care should be taken in those markets where MEDLOG may hold high market shares. For instance, under European Union law, it is very unlikely that a company will be considered as dominant if its market share in the relevant geographical market is below 40%. In any event, MEDLOG competes fairly and does not resort to methods other than those that are part of competition on the merits.



### **BUSINESS AND FINANCIAL RECORDS**

The accuracy and maintenance of MEDLOG'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



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## **CONTRACTS**

Each Employee must obtain all appropriate approvals before executing, modifying, or amending any contract. Unauthorized contracts or modification of contracts including oral agreements are prohibited and will not be recognised by MEDLOG.



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

### CONFIDENTIAL INFORMATION

Employees must safeguard all of their Confidential Information as well as any Confidential Information received from MEDLOG's 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 MEDLOG, including to family and friends, except if legally required.

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

management of Personal Data. Employees becoming aware of a breach of the Data Protection rules shall report it immediately to CH966-data.protection@medlog.com.

### **ELECTRONIC DEVICES**

MEDLOG 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 MEDLOG's policies.

MEDLOG is 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.

### **DATA PROTECTION AND PRIVACY**

MEDLOG 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. MEDLOG has adopted appropriate technical and organisational security measures to protect the Personal Data it processes and stores and takes precautions to prevent unauthorised disclosure.

MEDLOG 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 MEDLOG's data protection compliance programme, including but not limited to in relation to the collection, use and



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## PROTECTION OF INTELLECTUAL **PROPERTY RIGHTS**

Employees are expected to preserve and protect MEDLOG's Intellectual Property Rights.

Whenever an Employee becomes aware that any of MEDLOG's Intellectual Property Rights are violated by a third party, that Employee shall inform the headquarters' Corporate Legal Department, in Geneva.



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

MEDLOG encourages all Employees to participate responsibly and professionally in MEDLOG Social Media as a means of generating interest in MEDLOG's services and creating business opportunities.

MEDLOG encourages Employees to use the official MEDLOG pages on Social Media once launched. Every Employee can share and comment on any posts made on the official MEDLOG pages on Social Media.

If any Employee's work duties require them to speak on behalf of MEDLOG in a Social Media environment, the Employee must seek approval for the contents of such communication from the MSC Geneva Global Marketing Department, as MEDLOG is part of the MSC Group's Cargo Division (which can be contacted at social@msc.com).

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 MEDLOG Social Media, Employees should not post, or express a viewpoint on another's post, such as by "liking" a Facebook post, anything that MEDLOG or MEDLOG'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 the intranet or contact social@msc.com.

### PUBLIC SPEAKING AND MEDIA ENGAGEMENT

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

Any speech at a public event where an Employee identifies as MEDLOG and any comment to the media can be construed as a representation of MEDLOG, or even of the wider MSC Group Cargo Division. Therefore, MEDLOG needs to ensure that only appropriate information is disclosed in the public domain and that such representations are made in line with the Public Communications Policy, to a standard which benefits the MEDLOG brand and in a coordinated way across our global business.

Employees are therefore required to inform the MSC Global PR & Internal Communications function 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.

Like many other large organisations, MEDLOG, as part of the MSC Group's Cargo Division, operates a press office which interacts with the media via individuals who are experienced in understanding journalists' interests and needs.

Employees who are engaged unexpectedly by journalists, or who consider proactively to engage with the media, can contact the MSC Global PR & Internal Communications function, or send an email to media@msc.com.

Employees can access the Public Communications Policy via the intranet. The Public Communications Policy also governs the disclosure of official corporate news and announcements, which requires approval from the same MSC Global PR & Internal Communications function.

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