

Subcontractor and Carrier

Code of Conduct

The standard every partner in our network is required to meet

DOCUMENT REFERENCE

FLG-POL-008

REVISION

1

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POLICY OWNER

Chief Executive Officer

APPROVED BY

Jorge O. Freig Carrillo, Chief Executive Officer

NEXT REVIEW

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1. Purpose

Freig Logistics Group manages freight through a network of contracted carriers, customs agents, warehouse operators and equipment providers. Our clients hold us accountable for their conduct as if it were our own. This Code sets the minimum standard for entry to and continued participation in that network.

2. Application

This Code applies to every carrier, customs agent, freight forwarder, warehouse operator, yard operator, equipment provider, labor supplier and consultant engaged by any Freig Logistics Group entity, and to their employees and any party they engage in turn. Acceptance of a Freig Logistics Group order constitutes acceptance of this Code.

3. Qualification Requirements

1. Valid operating authority for every jurisdiction in which the party operates, including FMCSA operating authority and a current USDOT number in the United States, and the applicable SICT federal transport permits in Mexico.
2. A satisfactory FMCSA safety rating. Safety Measurement System BASIC scores are reviewed at onboarding and monitored thereafter, and a carrier that exceeds intervention thresholds may be suspended pending review.
3. Insurance at or above the limits stated in the contract, including auto liability, cargo, general liability and workers compensation, evidenced by a current certificate naming the parties required by the contract, with notification of cancellation or material change.
4. A drug and alcohol testing program compliant with 49 CFR Part 40 and Part 382 and current Clearinghouse queries, or the equivalent Mexican requirements.
5. Complete driver qualification files, valid licensing for the class and jurisdiction, and current medical certification.
6. Vehicle inspection, repair and maintenance records meeting 49 CFR Part 396 or the Mexican equivalent, and hours of service records under 49 CFR Part 395 or NOM-087-SICT-2-2024.

4. Security Requirements

1. Meet the CTPAT minimum security criteria applicable to the party's role, and hold or work toward OEA certification for operations in Mexico.
2. Apply high security seals meeting ISO 17712 and follow the seal control procedure, including verification and recording of seal numbers at every handover and immediate notification of any seal discrepancy.
3. Maintain vehicle tracking and permit geofencing and route monitoring where the contract requires it.
4. Follow designated routes. No unauthorized stop, deviation, transfer or overnight staging on a secured lane.

5. Screen personnel with access to secured cargo to the extent permitted by law, and control access to yards, warehouses and loaded equipment.
6. Notify Freig Logistics Group immediately of any theft, tamper, seal discrepancy, unauthorized access or suspected contraband, and preserve the scene and the evidence.

5. Conduct Requirements

1. Zero tolerance for bribery, kickbacks and facilitation payments, consistent with the Freig Logistics Group Anti Bribery and Business Integrity Policy and with the Foreign Corrupt Practices Act and Mexican anti corruption law.
2. No forced labor, bonded labor, human trafficking or child labor, in the party's own operations or in any operation it engages.
3. Lawful wages, working hours and rest, and respect for freedom of association.
4. No discrimination, harassment, retaliation or physical or verbal abuse.
5. Compliance with applicable environmental law, including hazardous materials transport rules, waste handling and spill response.
6. Accurate records and invoices, and no false statement to any customs or transport authority.

6. Subcontracting and Double Brokering

A party may not subcontract, re broker or otherwise transfer any Freig Logistics Group load or service to another party without prior written consent. Unauthorized re brokering is a fundamental breach and grounds for immediate removal from the network and for recovery of any resulting loss.

7. Audit and Monitoring

Freig Logistics Group reserves the right to verify compliance with this Code through document review, safety and insurance monitoring, performance scorecards, site visits and audit, either directly or through a client or an appointed third party, on reasonable notice. Parties are required to cooperate and to provide the records requested.

8. Reporting Concerns

Any person may report a suspected breach of this Code to Freig Logistics Group at contact@freiglogistics.com. Reports may be made confidentially. Retaliation against any person who raises a concern in good faith is itself a breach of this Code.

9. Consequences of Breach

Depending on severity, breach may result in a documented corrective action plan, suspension from tendering, suspension from active lanes, permanent removal from the network, termination of contract and referral to the relevant authority. Breaches involving safety, security, forced labor or corruption are treated as fundamental and normally result in immediate removal.

10. Acknowledgment and Review

Each party is required to acknowledge this Code in writing at onboarding and on each material revision, and to communicate its requirements to its own personnel and subcontractors. This Code is reviewed at least annually.

Approved and issued by

Signature and date

Jorge O. Freig Carrillo
Chief Executive Officer
Freig Logistics Group
