



Doing business the right way
**THE AMERICOLD BUSINESS PARTNER
CODE OF CONDUCT AND ETHICS**



A Message for Our Business Partners

At Americold, our goal is to be the global provider of choice for temperature-controlled infrastructure and supply chain solutions. We are proud of our critical role in the food supply chain, and continuously feel inspired to help put food on tables around the world.

Our inspiration comes from you, the producers, retailers, food service providers, suppliers and vendors we work with daily (our “Business Partners”) to bring passions to market.

Our commitment to support you is far reaching and full of purpose. However, as proud as we are of what we do, we are even more proud of how we do it. We live up to the highest standards of ethical behavior in every action and interaction, every day.

As our Business Partner, we ask that you do the same. Look to this Business Partner Code of Conduct and Ethics (“Code”) for help. It reflects our Values and outlines our expectations for you. Consider it a guide to join in our commitment to **Doing business the right way.**



CONTENTS

A MESSAGE FOR OUR BUSINESS PARTNERS

INTRODUCTION – DOING BUSINESS THE RIGHT WAY

ADDITIONAL NOTICES

► Customer Service

6. [Communicating Responsibly](#)

► Giving Back

7. [Human Rights](#) / 7. [Environmental and Sustainability Practices](#)

► Accountability

8. [Americold Assets](#) / 8. [Confidential and Personal Information](#)

9. [Inside Information](#) / 9. [Accurate Records](#)

► Teamwork

10. [Respect and Dignity](#) / 10. [Health and Safety](#)

► Integrity

11. [Conflicts of Interest](#) / 11. [Anti-Corruption](#) / 12. [Gifts and Entertainment](#)

12. [Operating Globally](#) / 12. [Fair Competition](#)



Introduction – Doing Business the Right Way

UPHOLD OUR VALUES

We have worked hard to build our reputation as one of the most honest and ethical companies in our industry. Our Business Partners are a vital part of this success. When working with us or on our behalf, do business the right way by reflecting our Values:

- Customer Service
- Accountability
- Integrity
- Giving Back
- Teamwork

Our Values are important because they define our culture and how we treat each other, our customers, and you, our Business Partner. Model them in your work with us and make sure **your** employees and Business Partners do the same.

FOLLOW THE LAW

We only work with those who are committed to the same legal standards we are. Conduct your business in full compliance with all applicable laws, regulations, guidelines, policies and organizational codes (including this one). If you find that more than one law or regulation applies, follow the stricter standard. Also, use good judgment and ask questions whenever you're unsure about the right thing to do.



The Helpline is maintained by an independent third-party provider. It is available online or by phone to all our Business Partners worldwide. **Helpline reports can be made anonymously.** When calling the Helpline from your country, you will be connected with an interpreter in your chosen language to complete your report. If reporting online, you will be able to select the language for your report.



SEE SOMETHING? SAY SOMETHING!

If you see any violations of laws, regulations, guidelines, policies and organizational codes (including this one) in connection with the work you do for us, speak up.

You can report concerns to your Americold contact, the [Compliance Department](#), or through the Americold Ethics Helpline.

The Helpline is available 24 hours a day, seven days a week. It can be reached via [web](#) or via phone:

US – 1-800-461-9330	Netherlands – 0800.022.0441
Argentina – 0800-333-0095	New Zealand – 0800.002341
Australia – 1-800-763-983	Poland – 00.800.141.0213
Austria – 0800.281119	Portugal – 00.800.180.367
Canada – 1-800-235-6302	Spain – 900.905460
Ireland – 1800-904-177	United Kingdom – 0-808-189-1053

When you speak up, know that you can do so without fear and remain anonymous. We prohibit all forms of retaliation against anyone who comes forward in good faith, and we will make every reasonable attempt to ensure that concerns are addressed appropriately.

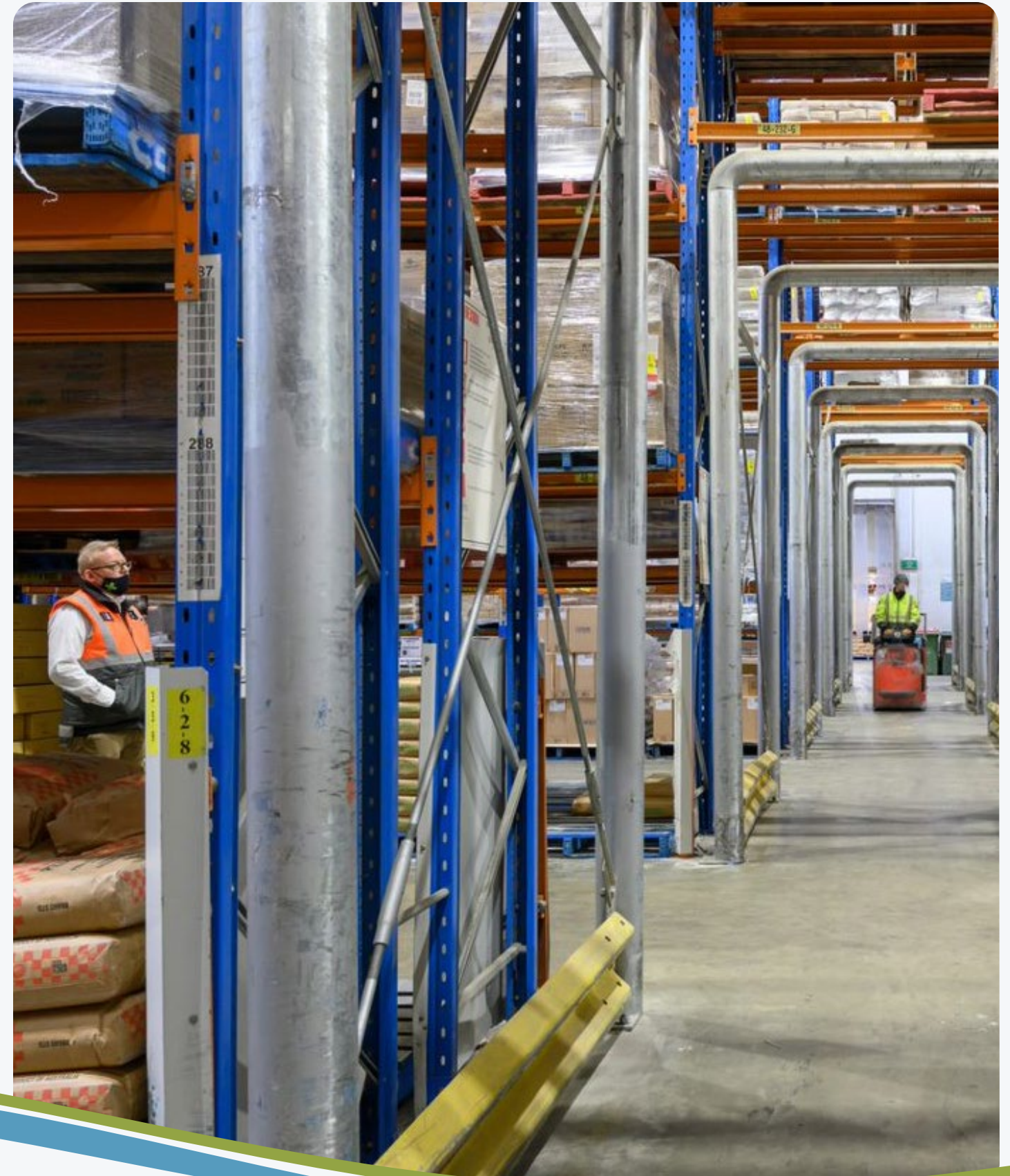
CUSTOMER SERVICE

COMMUNICATING RESPONSIBLY

Corporate messaging matters. It helps set customer expectations and, in turn, shapes customer experiences. So, it is important to get it right.

As our Business Partner, we want to ensure you deliver consistent and accurate messaging about Americold. Never speak publicly on our behalf and refer any requests for information to your designated Americold contact.

Also, use social media responsibly, never sharing confidential information or intellectual property and never misrepresenting your relationship with us. The Americold logo cannot be used without the express written consent of the Company.



GIVING BACK

HUMAN RIGHTS

We support fundamental human rights for all people. Help fulfill our commitment by protecting everyone who works with you or on your behalf and by prohibiting any practices that could harm them.

Do your part:

- Conduct employment practices in compliance with regulations
- Prohibit slavery, human trafficking, and child and forced labor in your organization and in your supply chain
- Provide employees with reasonable working hours, fair wages and safe working conditions
- Respect employees' rights to engage in collective bargaining and speak openly about work conditions

ENVIRONMENTAL AND SUSTAINABILITY PRACTICES

At Americold, we want to make tomorrow better by looking for ways to protect the planet, conserve natural resources and prevent pollution. That's why we take steps to create a more sustainable and climate-secure tomorrow and prioritize working with those who do the same.

Do your part:

- Implement sustainable practices that meet or exceed environmental laws and regulations
- Find ways to enhance and rebuild the environment and communities around you
- Reduce waste and use energy and natural resources efficiently
- Strive toward carbon-neutral practices in all business operations



ACCOUNTABILITY

AMERICOLD ASSETS

As our Business Partner, we entrust you with many of our physical, virtual and electronic assets to perform your jobs effectively and efficiently. We have invested a great deal in these assets. Respect them and protect them from theft, loss, damage and misuse.

Do your part:

- Treat our assets with the same level of care with which you treat your own
- Use our assets in the ways that they are intended to be used
- Secure our physical assets properly, e.g., by locking up items and shutting down systems
- Comply with Americold and other intellectual property ownership rights (including trademarks, patents and copyrights)
- Follow information systems policies to protect information networks, computers, programs and data
- Protect against cyberattacks by keeping up-to-date antivirus software, using strong passphrases and never clicking links or downloading attachments from unknown senders

Report any issue related to information security to: infosec@americold.com.

CONFIDENTIAL AND PERSONAL INFORMATION

Since we all have a right to confidentiality and privacy, we all have a responsibility to our colleagues and Business Partners in protecting confidential and personal information. In your work with us, keep all personal and confidential information secure, protecting it from loss, misuse and inappropriate access or disclosure.

Do your part:

- Only share confidential and personal information on a need-to-know basis and as permitted by Americold policies and the law
- Store confidential and personal information in ways that are safe and secure
- Properly classify information and follow records management and retention laws
- Follow data privacy laws and policies when dealing with personal information
- Ensure the right legal protections are in place, such as a non-disclosure agreement
- Take care not to discuss confidential information in public places
- Honor our confidentiality and privacy obligations, even if you leave your organization



INSIDE INFORMATION

Through our work, we at times become aware of information that is not known to the public and could affect the price of securities (“inside information”). Americold associates are never allowed to trade on inside information, tip others so they may trade, or share inside information with those who don’t need the information to do their job. As our Business Partner, we ask the same of you. If you have been exposed to inside information, be careful not to trade in any publicly traded securities or disclose such information to others unless it’s for a legitimate business reason.

ACCURATE RECORDS

Our books and records are crucial to our business operations, so they must always remain full, fair, accurate, timely and understandable. Ensure your records reflect the same high standards.

Do your part:

- Never falsify any transactions or record any misleading entries
- Carefully follow all legal requirements and controls and make sure all records are supported by proper documentation
- Ensure full transparency and honesty when interacting with regulators and auditors
- Manage records responsibly, by knowing and following all policies related to handling, storage and disposal of records



TEAMWORK

RESPECT AND DIGNITY

Being a key player in our industry requires us to work together as a team – a team that respects differences, values contributions and cares for one another’s wellbeing. Share in our commitment by fostering respect and dignity.

Do your part:

- Never base work-related decisions on protected characteristics
- Learn to identify harassment so that you can speak up if you see or suspect it
- Create an environment where all voices are heard
- Adopt and implement policies that respect and safeguard employment rights
- Value different experiences, cultures, perspectives and identities
- Take inventory of any explicit or implicit biases before making decisions

HEALTH AND SAFETY

We feel strongly that the health and safety of our employees and Business Partners are paramount to the work we do. Uphold our standards of safety by complying with all applicable laws, policies and regulations.

Do your part:

- Know and follow all health and safety laws and regulations
- Ensure a safe working environment and minimize hazards through proper design, controls, work procedures and on-going training and corrective actions
- Never work while impaired by alcohol, illegal drugs, recreational drugs or misused prescription or over-the-counter medications
- Report unsafe working conditions, hazards, accidents, illnesses, injuries, weapons, violence and threats of violence right away



INTEGRITY

CONFLICTS OF INTEREST

We actively avoid conflicts of interest. A conflict of interest can arise whenever a competing interest interferes with our ability to make an objective decision on behalf of Americold. We use good judgment and avoid situations that can lead to even the appearance of a conflict, and we expect the same from you.

Do your part:

- Understand what conflicts of interest are so you can avoid them
- Know when conflicts of interest typically arise, including when dealing with –
 - Outside jobs
 - Business opportunities
 - Personal relationships
 - Inappropriate offers of gifts or entertainment (as defined by Americold policy)
- Disclose any conflicts of interest, or potential conflicts of interest, that cannot be avoided

ANTI-CORRUPTION

We are committed to doing business in a way that is fair, transparent and beneficial for everyone involved. That's why we never pay bribes, kickbacks or facilitation payments, at any time for any reason.

We also partner with those who do the same.

Do your part:

- Never offer, give or accept anything of value to get business, keep business or gain an unfair business advantage
- Operate in strict compliance with anti-corruption standards and maintain accurate records of all transactions
- Never offer anything of value to government personnel or public officials



GIFTS AND ENTERTAINMENT

We strive to build healthy, lasting business relationships. A common manner of fostering good business relationships is through the exchange of nominal or non-extravagant gifts and entertainment. We have rules in place that govern such exchanges to avoid even the perception of anything improper. As our Business Partner, honor these guidelines.

Do your part:

- Ensure offers are –
 - Reasonable in value
 - Infrequent
 - In good taste
 - Unsolicited
 - Customary
 - Not in the form of cash or a cash equivalent, such as gift cards
 - In compliance with applicable laws and regulations
- Never exchange anything that could influence – *or give the perception of influencing* – a business decision
- Refuse or return anything inappropriate
- Observe stricter criteria when engaging with public officials
- Always allow common sense and moderation to prevail

OPERATING GLOBALLY

Our ability to work with Business Partners all over the world is a privilege. To maintain that privilege, we respect the laws that apply to our business everywhere we operate and work with those who uphold these same standards.

Do your part:

- Know the laws and regulations applicable in the locations where we conduct business together
- Be transparent in all transactions
- Know who is involved
- Classify and document imports and exports properly
- Obtain the necessary licenses and permits
- Never make facilitation payments
- Never trade with prohibited or sanctioned countries, individuals or businesses

FAIR COMPETITION

We believe in doing business fairly, and free of any corrupt influence, and we only work with those who reflect these beliefs.

Do your part:

- Follow antitrust and fair competition laws
- Avoid discussions about competitively sensitive matters
- Avoid agreements that inappropriately limit competition, including ones to –
 - Fix prices or terms of sale
 - Divide markets, customers or territories
 - Prevent competitors from entering the market
- Be transparent in all of your dealings and honest about your relationship with us

ADDITIONAL NOTICES

ADMINISTRATIVE

We reserve the right to verify our Business Partners' compliance with this Code through audits or other monitoring activities. If we become aware of any actions or conditions that violate our Business Partner Code, we may request that corrective action be taken. Furthermore, Americold maintains the right to terminate an agreement with any Business Partner who does not comply with this Code.

TRAINING AND COMPLIANCE WITH THE BUSINESS PARTNER CODE

It is the responsibility of the Business Partner to ensure its employees and representatives understand and comply with this Code. Any failure to comply with this Code, of which the Business Partner is aware, should be immediately reported to Americold. Failure to do so will be a breach of this Code. We will investigate any reported violation and discuss its findings with the Business Partner. The Business Partner shall assist with any such investigation and provide access to any information reasonably requested by Americold or its representative. If remediation is required, the Business Partner will be expected to inform Americold and implement a corrective action plan and timeline to resolve the failure effectively and promptly.

NO THIRD-PARTY RIGHTS

This Code does not create new or additional rights on the part of third parties (or their beneficiaries). This includes a right of the Business Partner's employees to cause Americold to enforce any provisions of this Code. This Code supplements, but does not supersede, the rights and obligations established under contracts between Americold and the Business Partner.

