



Norman G. Jensen, Inc.

Agency Relations With Overseas Partners (A.R.W.O.P.)

Code of Ethics

NGJ believes in doing business with Overseas Partners who embrace and demonstrate high standards of ethical behavior.

NGJ will not knowingly use Overseas Partners who operate in violation of applicable laws or regulations.

We expect our Overseas Partners to promote principles of ethical behavior in their workplace.

NGJ competes for business aggressively and honestly. We market our services on the basis of quality, distinctiveness, and fair pricing. We do not misrepresent service attributes or make false claims about our competitors.

We do not offer kickbacks or bribes.

We make all business decisions on the basis of the best value received by NGJ. We do not allow personal or family relationships to influence or appear to influence objective business decisions.

We do not accept or provide any gift, favor or entertainment if it will obligate or appear to obligate the recipient or otherwise influence any business decision. We will never accept a gift or service if it will compromise or could appear to compromise us. (This does not include occasional business meals that can be reciprocated or gifts of nominal value).

We do not request or solicit personal gifts, favors, entertainment or services. We never accept gifts of cash or cash equivalents.

Any gift or favor received, or any gift or favor intended to be given, that is more than nominal in value must be approved by the Manager of Coastal & Inland Ports, or by an Owner of NGJ.

NGJ is regulated by various US Government Agencies and International Entities, including, but not limited to Customs & Border Protection (US Customs), Federal Maritime Commission (FMC), International Air Transport Association (IATA), and US Departments of Transportation (DOT), Commerce (DOC), State (DOS), etc.

NGJ shall always place Regulatory Compliance over any internal or external (customer-driven, partner-driven, vendor-driven) need.