



C.H. ROBINSON

2026 Code of Ethics

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A Message from Chief Legal Officer Dorothy Capers

Robinson teammates,

For more than 120 years, we've provided industry-leading supply chain solutions, driven by our people, their commitment to excellence, and the trusted relationships each of you have built with our customers, contract carriers, growers, suppliers, and communities.

As we deliver on our purpose every day, it's critical that each of us commits to the guiding principles and policies of our corporate compliance program, including our Code of Ethics. Our reputation as a high-integrity and ethical company is fundamental to our performance and future growth.

Our Code of Ethics is not just a document—it's the foundation of how we operate. It guides us on how we should act and explains what is expected of us as C.H. Robinson employees. The Code of Ethics does not describe every difficult situation you may face. Instead, it provides overall guidance on conducting business honestly and ethically. We're relying on you to read and understand the Code, and to exercise good judgment. If you see something not reflective of The Robinson Way, or any violation of our policies, report it honestly and with positive intention. We take all concerns seriously and do not tolerate any retaliation against reporters.

If you have questions, use the Code of Ethics as your guide. And if you're still unsure about the right decision or have concerns, ask for help from your leader or connect with Charlie. We're committed to working with you to maintain our highly regarded reputation and performance.

With these policies, our commitment to The Robinson Way, and the support and drive of every team member, we deliver on our purpose: Together, we keep the world moving forward. Every shipment. Every challenge. Every day. You play a key role in these efforts and our overall success. Thank you!



Sincerely,

Dorothy Capers

Chief Legal Officer/Secretary

Introduction

The C.H. Robinson Code of Ethics, or “Code,” reflects our Company culture and our abiding commitment to do what is right. The Code is also necessary to effectively manage our business. All employees, directors, officers, and Board members of C.H. Robinson and its subsidiaries (our “team”) are required to know and follow the Code, as well as all applicable laws and regulations. If a situation arises where there may be a conflict between the Code and the applicable laws of the country in which you are located or doing business, you should consult with the Legal Department. We are committed to doing business ethically and within the law.

Every day, team members are expected to demonstrate The Robinson Way, by working ethically, responsibly, and with professionalism and by showing respect, being accountable, communicating honestly, protecting confidential information, and making decisions that reflect our values. Upholding integrity is part of every task and interaction—whether anyone is watching or not. This means doing the right thing consistently, speaking up when something doesn’t seem right, and complying with laws and policies.

Nothing contained in this Code, or other communications relating to this Code, creates or implies an employment contract or term of employment. C.H. Robinson continuously reviews its policies, and this Code is subject to modification.

Throughout this Code, the terms “C.H. Robinson” and “Company” refer interchangeably to C.H. Robinson Worldwide, Inc., or any Company, division, market unit, or business unit, subsidiary, or majority-owned venture of C.H. Robinson Worldwide, Inc. The Code applies to every C.H. Robinson employee and director in any Company, division, subsidiary, market unit, or business unit, including joint ventures where C.H. Robinson maintains management control (our “team”). Regardless of where an employee works (in office or remote), C.H. Robinson rules and policies apply. In addition to the Code of Ethics, there may also be more regional policies and expectations applicable to employees depending on their location. Please refer to your regional handbook for specifics.



The Robinson Way

C.H. Robinson has a long-standing history of demonstrating high standards of ethics, respect, and integrity at all levels of the organization. We know how important it is to do the right thing in our business practices and in all our relationships—inside and outside of the Company. Our customers, contract carriers, and vendors have high expectations of us, and we have even higher expectations of ourselves.

The Robinson Way is critical to building trust and respect in our Company, industry, and with our employees, customers, contract carriers, vendors, and shareholders. It includes our Company purpose, customer promise, and core behaviors, and it connects us with a shared meaning of who we are and how we do things at C.H. Robinson.

Our Board of Directors and Executive Leadership team hold themselves to the same high standards of conduct we expect of all employees. Our obligation is to set the right example for behavior and workplace conduct and to live by The Robinson Way to maintain our reputation as a trusted, respected, and ethical industry leader.

The Robinson Way helps ensure we are good citizens in our communities and we make all reasonable efforts to maintain a positive and healthy work environment for our employees.

We value each employee and their ability to develop in a positive way. In partnership with all members of C.H. Robinson, we expect all employees to:

- Be fair and honest.
- Be polite and respectful of the opinions of others.
- Treat others the way you would like to be treated.
- Behave in a responsible and professional manner.
- Treat others in the workplace with courtesy and respect.
- Support a diverse, inclusive, and safe work environment.
- Listen and respond appropriately to the views and concerns of others.
- Ensure the work environment is free from demeaning, denigrating, or insulting comments and actions.

Our Purpose

Together, we keep the world moving forward. Every shipment. Every challenge. Every day.

Our Promise

We deliver exceptional service and high value—like no one else—through our unmatched expertise, unrivaled scale, and tailored solutions.

Our Behaviors

Authentic | Forge lasting relationships with integrity, honesty, and respect.

Persistent | Commit until the job is done right.

Accountable | Own successes and failures; grow from both.

Curious | Challenge the status quo, learn, and improve.

United | Raise the bar and win together.

Working together respectfully

Non-Discrimination and Anti-Harassment Policy

Equal Employment Opportunity

The C.H. Robinson policy gives equal opportunity in recruitment, employment, training, compensation, promotion, and all other terms and conditions of employment or work to each individual without regard to race, color, religion, gender, sex (including pregnancy, childbirth, medical conditions related to pregnancy or childbirth, breastfeeding, or medical conditions related to breastfeeding/lactation), sexual orientation, gender identity, marital status, age, national origin, disability, military service or status, or any other legally protected characteristic.

Reasonable accommodations are provided to applicants, employees, and other team members with disabilities to enable them to be considered for, and to perform the duties of, available positions for which they are qualified. It is a violation of this policy for any employee or team member to cause or allow any form of discrimination.

Anti-Harassment Policy

C.H. Robinson is committed to maintaining a workplace free from unlawful harassment.

Defining harassment

Harassment is a form of discrimination and is strictly prohibited. Harassment can occur based on any protected characteristic, such as race (including hairstyle), national origin (including work authorization), religion, age, gender (including gender identity), sex (including pregnancy, childbirth, medical conditions related to pregnancy or childbirth, breastfeeding, or medical conditions related to breastfeeding/lactation), sexual orientation, gender identity, or any other protected characteristic. Harassment based on sex can present unique issues, including the possibility of unwelcome sexual advances.

It is a violation of C.H. Robinson policy for any person to suggest, threaten, or insinuate, either explicitly or implicitly, that any employee's submission to, or rejection of, sexual advances will in any way, either positively or negatively, affect their working conditions.

Anti-harassment responsibilities of leadership

Those in a leadership role have an additional responsibility to ensure no activities are allowed to take place at work or at Company-sponsored events that create a harassing, intimidating, hostile, or offensive work environment based on any protected characteristic.

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical contact of a sexual nature constitutes sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly on a term or condition of an individual's employment.
- Submission or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual.
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

No team member, whether in a leadership position or otherwise, shall engage in any unwelcome physical contact or touching of another team member. Sexual contact or touching is strictly prohibited.

Anti-harassment responsibilities

Words and actions also can be harassment, just like demands for sexual favors or unwelcome physical contact. For example, you must not:

- Make threats of a sexual nature.
- Make unwelcome sexual insinuations or innuendoes.
- Use sexually oriented or degrading words to describe employees.
- Make unwelcome suggestions or invitations to social engagements.
- Use offensive or demeaning terms or actions that have a sexual or other improper connotation.
- Make harassing or threatening comments or gestures based on gender or any other protected characteristic.
- Make inappropriate remarks about a team member's physical appearance or anatomy or make suggestions about a team member's personal or sexual habits.
- Make other verbal remarks or comments or engage in other activities that unreasonably interfere with an individual's work performance, or that create an intimidating, hostile, or offensive working environment based on sex or another protected characteristic.

Harassment of protected characteristics

Harassment based on any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written, or physical conduct that denigrates or shows hostility or aversion toward individuals because of their race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of their relatives, friends, or associates, and that:

- Has the purpose or effect of creating an intimidating, hostile, or offensive work environment.
- Has the purpose or effect of unreasonably interfering with an individual's work performance.
- Otherwise adversely affects an individual's employment or work opportunities.

Any type of conduct that unreasonably interferes with a team member's work performance, or which creates a hostile or intimidating working environment based on gender or any other protected characteristic is prohibited.

The display or dissemination of materials (such as cartoons, articles, pictures, etc.) of a sexual, racial, or other protected nature that is not necessary for work may constitute harassment.

Outside company harassment

C.H. Robinson will not tolerate harassment of or by non-team members, such as customers, carriers, contractors, vendors, visitors, or others.

Disciplinary action for violation

C.H. Robinson will not tolerate discrimination or harassment based on any protected characteristic within the work environment or at Company-sponsored events. If C.H. Robinson concludes such discrimination or harassment has occurred, appropriate disciplinary actions will be taken, up to and including, termination of anyone involved in discrimination or harassment and those condoning or permitting such discrimination or harassment.

The appropriate action will depend on the following factors:

- Prior complaints made by the complainant.
- Prior complaints made against the respondent.
- The severity, frequency, and pervasiveness of the conduct.
- The quality of the evidence (e.g., first-hand knowledge, credible corroboration).

Obligation to report discrimination or harassment

C.H. Robinson requires each team member to help keep the Company free from discrimination or harassment. If you see any form of harassment, report it to your leader, Human Resources, the Legal Department, or through the anonymous reporting process. Any team member aware of possible violations of these policies is required to report the situation so it can be investigated and appropriately addressed. It is not sufficient to report a complaint of harassment or discrimination to any other person or department other than your leader, Human Resources, the Legal Department, or the anonymous reporting process.

How to report

If you are unsure whether a violation has occurred, discuss it with your leader. Your leader will know what steps should be taken to determine if a policy violation has occurred.

If you feel you cannot talk to your leader or a member of leadership, or you wish to remain anonymous, you can report through the anonymous reporting process. An independent company will take your report and pass it on to the Company for investigation. This is not a dispute resolution process. Rather, it allows team members to report issues so the Company can determine if the Code of Ethics or applicable policies have been violated and take appropriate action and follow-up.

Investigation procedures

C.H. Robinson will take all reasonable measures to prevent harassment and discrimination, including a thorough and prompt investigation of any complaint and immediate and appropriate disciplinary action, where warranted. C.H. Robinson will take all necessary measures to keep the investigation as confidential as possible and share information only on a need-to-know basis.

Leader responsibility

Leaders have additional responsibilities when it comes to discrimination, including any form of harassment. Not only must leaders conduct themselves in a manner consistent with the Code of Ethics and applicable policies, they are also responsible for establishing and maintaining a climate in the workplace free from discrimination or harassment, where all applicants and employees enjoy equal employment opportunity. Leaders must be alert for incidents of discrimination or harassment and take prompt, corrective action in accordance with the C.H. Robinson policy. Their success in their jobs depends in part on the successful implementation of these policies.

Leaders are required to report any complaint of discrimination or harassment as soon as reasonably possible and to consult with Human Resources or the Legal Department regarding any questions or for assistance in investigating or addressing any possible violations of this policy.

No retaliation for reporting suspected violations

C.H. Robinson prohibits any team member or Company representative from retaliating in any way against anyone who has articulated any concern regarding harassment, discrimination, or other violations of Company policies.

No adverse action will be taken against a complaining team member as a result of making the complaint, regardless of the outcome of the investigation, unless the complaint was not made in good faith. No retaliation of any kind will occur or be tolerated for reporting an incident of suspected discrimination or harassment or for assisting in an investigation.

Investigations will commence within a reasonable timeframe upon notification of the complaint and will be conducted as expeditiously as possible. While the Company cannot guarantee confidentiality of all aspects of the investigation, it will make every effort to protect the privacy interest of the accused offender and the alleged victim.

To the extent you have any further questions, you should contact your leader, Human Resources, or the Legal Department.

Compliance with law

The C.H. Robinson policy is to comply with the federal, state, and local constitutions of the countries in which we are conducting business and all applicable laws.

More specific details on local and federal laws can be found in your region's Employee Handbook. Any Company team member should contact the Legal Department for any questions about compliance with laws, this Code of Ethics, or applicable policies.

Questions or concerns relating to this section

Resources

[Human Resources](#)

[Legal Department](#)

[Anonymous Reporting Process](#)

Protecting our business

Global Data Privacy Policy

Global obligations to Personally Identifiable Information and policy compliance

As a global Company, C.H. Robinson has an obligation to treat Personally Identifiable Information (PII) in alignment with our legal obligations. C.H. Robinson expects you to comply with Company privacy policies, standards, processes, and procedures established to manage risk and maintain compliance with these global obligations.

Defining Personally Identifiable Information

C.H. Robinson defines PII as any information that directly or indirectly identifies an individual or member of a household. PII also includes combinations of data. Simply put, this includes: (1) any information that can be used to distinguish or trace an individual's identity, and (2) any other information that is linked or linkable to an individual.

Examples of PII, alone or in combination, include:

- Contact information, such as name, email address, phone number, and residential address
- Digital identifiers, such as device ID, IP address, pixel tags, and cookies
- Precise geolocation
- Voice recordings
- Online identifiers, such as usernames
- Financial information
- Identification information, such as driver's licenses and passports
- Employment information
- Combined datasets creating new data that identifies an individual

Accidental disclosures of PII

If you become aware of any disclosures or use of PII not allowed by C.H. Robinson data protection and/or privacy policies and standards, or this Code, you must report such disclosures to the C.H. Robinson Privacy Department.

Use of PII

C.H. Robinson collects, stores, and uses PII in three main categories: human resource data, customer/shipper data, and carrier/driver data. C.H. Robinson also processes personal information outside of these main categories. It is important to ensure you understand the data in your care, follow documented procedures, and comply with Company policies.

The use of security safeguards and compliance with technology requirements to protect PII and other Company data are mandatory. Any use of PII that does not align with these requirements may not occur.

This policy outlines our expectations regarding collecting, storing, and using PII. You must:

- Not use data in ways that are contrary to policy.
- Comply with customer contractual obligations.
- Comply with privacy assessment and risk management policies.
- Report breaches of data, either real or suspected, through appropriate channels immediately.
- Comply with procurement and third-party supplier policies prior to disclosing PII to third-party suppliers.
- Comply with technology and cybersecurity policies and procedures to safeguard PII.
- Comply with privacy-by-design policies or processes, including privacy controls in the software development lifecycle, analytics, and execution of artificial intelligence.

PII may only be used in alignment with the following:

- Laws and regulations
- Customer contractual terms
- Company policy on the use of data as described in this Code, as well as any additional policies and standards
- The C.H. Robinson Global Data Privacy Notice, Global Employee Privacy Notice, the Global Monitoring Notice

Privacy by design

Designing business processes, or developing technology with privacy in mind, is required when any PII is used. Prior to collecting, using, or processing PII, or prior to development of technology that processes PII, privacy requirements must be considered, and decisions made must be documented before processing PII. Privacy-by-design considerations include:

Legal basis

Before processing PII, the legal basis for processing the information must be established and documented.

Minimizing the collection of PII

Collect only the minimum amount of PII necessary for the purpose.

Limiting the use of PII

Limit the use of PII to the original purpose for which it was collected as described in the C.H. Robinson Global Privacy Notice and/or Employee Global Privacy Notice.

Security safeguards

Comply with all Company security policies to protect PII.

Access controls

Access to PII must be limited to those who have a need to know in order to perform their essential job functions. This is called a need-to-know basis.

Individual rights

Systems and business process must include mechanisms to address individual rights including access, portability, deletion/erasure capabilities, capabilities to limit the use of sensitive PII, objections to automated processing automated decision making, objections to the sale or sharing of PII, and quality and accuracy checks.

Contracts with third parties

Contracts with approved data privacy and protection language must be in place with third parties before sharing PII. Please reach out to the Legal Department for more information and comply with procurement processes when contracting.

Retention

Retain PII for only as long as necessary to fulfill the original purpose for which it was collected. See the C.H. Robinson Record Retention Policy and Schedule or contact the Privacy Department to learn more.

Analytics

When analytics can meet objectives without direct identifiers, teams must use pseudonymization or anonymization per Privacy Standards; re-identification is prohibited unless approved by Privacy with documented legal basis.

Test and demo data

PII cannot be used for testing or demonstration purposes, or be released, used, or otherwise processed in non-production environments, including but not limited to, test, demonstration, or development environments or used for testing, demonstrations, or development processes.

Business and technical teams are responsible for following these privacy-by-design principles and requirements as documented and/or at the direction by the Privacy Department.

Privacy assessments

The Company may only use PII when a legal basis for processing has been established and is documented. PII may not be used in ways other than described in the C.H. Robinson Global Privacy Notice and Global Employee Privacy Notice.

Business and technical teams are responsible for ensuring privacy assessments are completed as required by this policy, and identified risk is managed.

Privacy assessments may be required when:

- New PII is collected.
- PII is used for analytics.
- The Privacy Department requires it.
- PII is used to create profiles about individuals.
- New technology is developed for processing PII.

- Processing involves automated decisions about individuals.
- Datasets are combined to create new data about individuals.
- Changes to existing technologies or processes that process PII.
- Artificial Intelligence is available from third parties that process personal information.
- Data lakes, warehouses, and/or large data stores containing PII are created or consumed.
- Artificial intelligence decisions (outputs) have a direct impact on an individual or group of individuals.
- Algorithms that use PII are created or expanded to include additional PII or modified to use PII in a new way.
- Existing technologies or processes that did not previously process PII, begin to collect, use, or otherwise process PII.
- New or expanded use of algorithms or large language models that use PII or impact decisions made about individuals.
- PII includes highly confidential information including, but not limited to, SSN, CC#, sexual preference, sexual orientation, race, ethnicity, biometric data, etc. (see information classification).

Third-party supplier reviews

Prior to disclosing PII to a third-party supplier of services, the third party must be assessed in accordance with Company policies and procurement processes that include, but are not limited to, privacy, security assessments, and reviews, legal contractual reviews, and inclusion of appropriate data processing addendums, data transfer language, and inclusion of documentation of personal data shared with third-party suppliers for services.

Third-party renewals, new features, or changes to service

Third-party suppliers and/or the related business processes may require re-assessment by Privacy periodically. For example, a re-assessment may be triggered in instances of contract renewal, when new features are utilized, when there are changes to services and/or processing of personal information, utilization of AI offered by the supplier, and/or if the supplier is involved in security incidents or data breaches.

Compliance with contractual obligations

When directed by our customers to limit use of their data through contractual obligations, business and technical teams must comply with established controls to ensure customer contracts are honored.

Human Resources Data Governance Policy

The Human Resources (HR) Data Governance policy is intended to provide assurance to the organization that the use of HR data complies with applicable Company priorities, policies within the Code and handbooks, and legal and regulatory obligations. The Policy goals also include ensuring any HR data accessed and used is the right data, at the right time, and for the right audience. Please note the policy incorporates the above concepts and principles from the Global Data Privacy Policy and applies them in the context of HR and its data needs.

Asset Protection and Information Classification Policy

The C.H. Robinson policy ensures all information assets are protected. Information assets are data we store, transmit, and work with to manage and conduct business operations.

C.H. Robinson classifies information into four categories based on the sensitivity and value of the information. This is called information classification. The categories are: public, general, confidential, and highly confidential. All data you interact with will fit into one of these four categories. You are accountable for the appropriate classification and subsequent handling of the information you come across within the course of your work and business processes.



Public

This information is specifically prepared for public use and consumption.

This data, typically business data such as quarterly earnings reports or press releases, is published to external sources and available to the general public. Anyone can view and share this information.

General

Information that is not available nor intended to be made available for public use or consumption.

This information carries risk if shared broadly outside the Company.

Confidential

Information that, if lost, stolen, or otherwise breached, would cause harm to C.H. Robinson, customers, carriers, and/or employees.

This information is typically C.H. Robinson intellectual property, covered under contractual obligations, and/or, in the case of PII, regulated by data privacy laws.

Highly Confidential

Information that if lost, stolen, or otherwise breached, would cause significant harm to C.H. Robinson, customers, carriers, and/or employees.

This information is typically C.H. Robinson intellectual property, covered under contractual obligations, and/or, in the case of PII, regulated by data privacy laws.

As an information owner, user, custodian, or steward on behalf of C.H. Robinson, you are accountable for protecting all information assets from misuse, theft, fraud, loss, and unauthorized use, disclosure, or disposal. Information assets include information that is both Personally Identifiable Information (PII), as well as other non-PII such as company, customer, supplier, or carrier information, and Company intellectual property. The following are some additional examples of information assets. Please note, the examples are not fully comprehensive or fully representative of the information C.H. Robinson processes.

Examples

Public	General
<ul style="list-style-type: none"> • Press releases • Quarterly earnings, post filing • Compliant social media postings per Social Media Policy 	<p>Business Data</p> <ul style="list-style-type: none"> • CHRonicle articles • Viva Engage communities • Leadership announcements • Internal Company communications • All hands or town hall meeting content • Internal blog postings and leader newsletters <p>Personally Identifiable Information (PII)</p> <ul style="list-style-type: none"> • Information available to all workers that can be found in Workday, Outlook, and MS Teams, including Company-issued email addresses and phone numbers, leadership hierarchy, branch code, etc.
Confidential	Highly Confidential
<p>Business Data</p> <ul style="list-style-type: none"> • Pricing strategies • Customer and/or provider lists • Business and product plans with outside vendor • Designs and software service and know how process • Business, financial, marketing, and service plans associated with products and services • Customer information such as lanes, pricing, shipments, contracts, correspondence, etc. <p>Personally Identifiable Information (PII)</p> <ul style="list-style-type: none"> • Time tracking • Absence data • Applicant's resume/CV • Employment information • Information captured by cookies or pixel tags • Online identifiers such as user ID, IP address, device ID • O/D pairs when one of the locations is an individual's residence • Customer, driver, and carrier contact information such as phone number or email address 	<p>Business Data</p> <ul style="list-style-type: none"> • Current or pending litigation • Trade secrets and technology • Pre-filed Securities and Exchange Commission (SEC) filing information • Information related to the acquisition or disposition by the Company of companies or business units <p>Personally Identifiable Information (PII)</p> <ul style="list-style-type: none"> • Education • Health data • Disability status • Political opinions • Sexual orientation • Credit card numbers • Compensation/payroll • Racial or ethnic origin • Veteran/military status • Bank account numbers • Background check data • Social Security Number • Trade union membership • Biometrics and genetic data • Religious or philosophical beliefs • Driver's license/passport/national identification numbers • Employee personal phone number including emergency contact number or personal cell phone • Precise GPS location data/live tracking events obtained through use of a personal device or other tracking mechanism

Non-disclosure of information

You will have access to information that falls under all or most of these classifications. It is important to know you are accountable for not using or disclosing information except when you are specifically authorized to do so.

Protecting information assets

You are accountable for not using information assets for any personal gain or advantage. This includes sharing such information with individuals outside C.H. Robinson for personal use, as well as sharing with fellow team members whose duties do not require them to have that information. This restriction applies even if you developed or aided in the development of an information asset.

Document labeling

To the extent possible, make sure all information assets are clearly labeled with the appropriate classification. If a document has a blend of information contained within it, the label should reflect the highest and most restrictive classification. For example, if a document contains data classified as both General and Confidential, the document should be classified as "C.H. Robinson – Confidential," as this is the more restrictive classification.

Proper handling/securing of information assets

Understand the classification of the data you work with and ensure you secure it in accordance with its classification. You must comply with all technology and cybersecurity policies and procedures to protect and secure Company information.

Non-disclosure of third-party information

No team member shall disclose any information belonging to a third party without first obtaining the express written permission of such third party.

If you have or are aware of information of a third party, you are legally and ethically obligated not to use the information for any purpose except for intended or disclosed purpose. You also are accountable for not disclosing information to any team member or anyone else who does not have a legitimate need to know such information.

Releasing business information

The use or release of business information through speeches, interviews, statements to the press, or other means of communication requires prior approval through authorized channels. Please review the Communications and Media Relations Policy within the Code of Ethics.

Non-disclosure agreements

If you have a business need to disclose certain information assets with a third party (including an existing or prospective customer, carrier, service provider, or third-party supplier), you must ensure such disclosure is protected with a Non-Disclosure Agreement ("NDA") or other contractual agreement for third-party suppliers.

An NDA places protections, obligations, restrictions, and limitations on using Company information assets by third parties when disclosed to third parties. No information asset including PII (See Global Data Privacy section) may be disclosed or provided to a third party without the use of an NDA.

Not all information assets may be disclosed to a third party, even under an NDA. Contact the Legal Department for assistance in determining whether an information asset may be disclosed to a third party and to establish an appropriate NDA.

Contracting with third-party suppliers (vendors)

Prior to engaging a third party for contracted goods and/or services, you must review and comply with the Procurement Policy within the Code of Ethics. This includes ensuring you conduct security and privacy due diligence reviews prior to contracting with the third party.

Leaving the company

Even when you end your relationship with the Company for any reason, you are bound by the same obligations to protect C.H. Robinson information assets and third-party information. You are also bound to certain continuing obligations to the Company that survive the termination of your employment and/or associations with the Company, such as the Confidentiality and Protection of Business Agreement and the Management-Employee Agreement, as applicable. After you leave the Company, C.H. Robinson continues to own any information asset you developed or assisted in developing while a C.H. Robinson team member.

If you have or are aware of information from a former employer, business partner, or customer, you may be legally or ethically bound by a non-disclosure obligation restricting your use of that information or sharing it with your fellow team members. C.H. Robinson expects and requires you to fulfill this obligation. You also must refrain from sharing C.H. Robinson business information with any of your former or future employers, business partners, or customers.

Exceptions to disclosure obligations

An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in confidence to a federal, state, or local government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law.

An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

Retaliation lawsuits and trade secrets

An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law, may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

Accurate Books and Records Policy

Detailed and complete records

The C.H. Robinson policy is to make and keep detailed, accurate, and complete financial records for the time periods they are needed for business purposes and as required by law.

Company financial records

Accurate and reliable corporate financial records shall always be maintained. All funds and other assets and all transactions for

C.H. Robinson must be reflected in full detail and promptly recorded in the appropriate C.H. Robinson books. Accepted accounting principles must be used for all recording.

C.H. Robinson financial records must reflect an accurate and verifiable record of all transactions. Information you record and submit to another party, whether that party is inside or outside C.H. Robinson, must be accurate, timely, and complete.

You must not use any report or record to mislead those who receive them or to conceal anything that is improper.

Managing expense accounts

Expense accounts are a particularly important financial record. Team members are entitled to reimbursement for Company-approved, reasonable business expenses only if the expenses are actually incurred and evidenced. For example: to submit an expense account for meals not eaten, miles not driven, or airline tickets not used is dishonest reporting.

For purposes of this policy, financial records include all information pertaining to financial transactions that are executed on behalf of C.H. Robinson, including the proper recording of all transactions and records received and kept in C.H. Robinson files related to financial transactions and all information recorded in the accounting records and financial statements of C.H. Robinson.

Some examples include (but not limited to):

- Contracts
- Time tracking reports
- Expense account records
- Accounting journal entries
- Emails relating to transactions
- Recordings in the general ledger
- Invoices issued by C.H. Robinson
- Invoices received by C.H. Robinson

Transactions include all payments of money, transfers of property, and furnishing of services.

All records and information must truthfully and in reasonable detail reflect the substance of the transaction. There is no materiality standard. All transactions must be recorded correctly regardless of amount. Examples of violations include records that:

- Fail to record improper transactions.
- Are falsified to disguise aspects of improper transactions that were otherwise recorded correctly.
- Correctly set forth the quantitative aspects of the transaction but fail to record the qualitative aspects that would have revealed their illegality or impropriety.

The Records Management and Retention Policy has been developed to provide all team members of C.H. Robinson with a comprehensive set of guidelines for the management, handling, and disposition of Company documents and information, including financial records.



Applicable laws and regulations

U.S. law, including the U.S. Foreign Corrupt Practices Act (“FCPA”), requires C.H. Robinson financial records accurately reflect all transactions, including any payment of money, transfer of property, or furnishing of services.

These transactions must be recorded accurately regardless of whether the transactions are legal at the place where the transaction occurs.

The FCPA establishes the following requirements regarding record-keeping and communications. All employees are responsible to comply with the following requirements:

- No undisclosed or unrecorded fund may be established for any purpose.
- All disbursements of funds and all receipts must be properly, accurately, and promptly recorded.
- All transactions must be recorded in reasonable detail to reflect the substance of the transaction accurately and fairly.
- C.H. Robinson financial statements, accounting records, and all transaction supporting documentation must accurately reflect all transactions.
- No team member shall intentionally allocate costs to contracts when those costs are contrary to contract provisions or accepted accounting practices.
- No false or artificial statements or entries may be made for any purpose in the records of C.H. Robinson or in any internal or external correspondence, memoranda, or communication of any type, including telephone or wire communications.

The FCPA also requires C.H. Robinson to devise and maintain a system of internal accounting controls sufficient to provide reasonable assurances that:

- Transactions are executed and access to assets is permitted only in accordance with leadership authorization.
- Transactions are recorded in a way to permit financial statements to be prepared in accordance with generally accepted accounting principles (GAAP).

No “private” business records

Concerning transactions entered on behalf of C.H. Robinson, there is no such thing as a “private” business record. Notes that you maintain for your individual use at home are subject to investigation and disclosure, just as files maintained on Company property are.

All records pertaining to C.H. Robinson, including any you keep off Company property, are subject to the requirements of this policy.

Penalties for dishonest reporting

Dishonest reporting, both inside and outside the Company, is not only strictly prohibited, but it could also lead to civil or even criminal liability for you and C.H. Robinson. This includes reporting information or organizing it in a way that is intended to mislead or misinform those who receive it.

Particularly serious would be the external reporting of false or misleading financial information. This policy applies to all C.H. Robinson team members, regardless of whether they are U.S. citizens or not and regardless of whether the transaction at issue takes place within or outside the United States.

Approval of transactions

No transactions will be recorded in the accounts of the Company unless they are within the scope of written policies and procedures or specifically and formally approved by designated individuals.

Auditing compliance

Compliance with this corporate policy will be tested and evaluated by the Company’s Internal Audit Department in connection with the ongoing internal audit process.



Policy guidelines for handling documents

The Record Retention Policy and record retention schedule

The C.H. Robinson Legal Department and Enterprise Data Governance Committee has the authority to establish, maintain, and implement a comprehensive Record Retention Policy and Schedule, including updates and modifications to approve uniform practices, procedures, and guidelines for the management, maintenance, and destruction of documents.

These guidelines have been established to ensure the Company's compliance with all applicable federal and state laws and regulations, and to accommodate the Company's need for access to its important business documents and records for a reasonable period.

These policies are also intended to ensure the Company's retention and storage of documents is conducted in an efficient and cost-effective manner.

Destroying records

Destruction of records will take place in compliance with standard procedures to avoid any inference that any record was destroyed in anticipation of a specific problem.

All destruction procedures will be suspended when a record or group of records are placed on legal hold, which is described below.

The Records Retention Policy and Schedule control the maintenance, storage, and destruction of all Company records. A record is any compilation of information, regardless of its physical characteristics, which was created or received by C.H. Robinson, and which should be preserved because of its business or evidentiary value.

Records may be in physical (e.g., paper) or electronic format, and are inclusive of computer tapes and discs, microfilm, video, etc.

Placing legal holds on records

From time to time, C.H. Robinson may be required to place a "legal hold" on a class or group of records as the result of actual or potential legal, individual, or administrative action.

Defining legal holds

A "legal hold" suspends all destruction procedures to preserve appropriate records under special circumstances. The Legal Department is responsible for determining when a "legal hold" is required and the scope of records to which it applies. You will be notified if a "legal hold" is placed on records for which you are responsible. You are then required to locate, index, and protect the records affected by a "legal hold" in accordance with the instructions provided by the Legal Department.

Preserving legal holds

Any record affected by a "legal hold" must not be destroyed under any circumstances. If you are unsure whether a record is affected by a specific "legal hold," contact the Legal Department immediately; you must protect and preserve that record until you have requested and received clarification from the Legal Department.

Releasing legal holds

A "legal hold" remains effective until it is officially released in writing by the Legal Department. After you receive written notice a "legal hold" has been lifted, you may return all affected records to their normal handling procedures and retention schedule.

Receipt of legal documents by C.H. Robinson employees

Team members who are served on the job, in the mail, or at home with any legal documents related to Company activities—including, but not limited to, summons and complaints, security issues, general and regulatory agency subpoenas, EEOC complaints, Security of State, or writs of garnishments/IRS levies—should contact the Legal Department immediately.

Company Property Policies

The purpose of this policy is to ensure all property maintained by C.H. Robinson is kept in the best possible working condition and to ensure proper use of such property and C.H. Robinson networks.

Use of company resources

C.H. Robinson will provide you with the necessary equipment to do your job. This equipment may not be removed from your place of employment unless it is approved, and your job specifically requires you to use Company equipment outside the facility. Company resources may not be used by non-employees or external organizations unless approved and for a business-related purpose (e.g., contingent workers).

Proper use of property

It is the policy of C.H. Robinson to properly use all Company property (including leased property), which encompasses all property owned by C.H. Robinson, including Company funds, real property, intellectual property, hardware, software, trade secrets, data, and Company information.

You are responsible for the proper use of Company property and must safeguard this property against loss, damage, misuse, or theft. You may not use Company property for any use other than Company business without Company approval.

Responsibility for company funds

You are personally responsible for all Company funds over which you exercise control. You must take all reasonable steps to ensure that C.H. Robinson receives good value for Company funds spent and must maintain accurate records of these expenditures. You must not use Company funds for any personal use.

Company-owned licenses and software

C.H. Robinson has obtained licenses for computer software from outside vendors. This software and any related documentation may not be reproduced unless the software developer has given authorization.

Software and documentation C.H. Robinson has developed or enhanced also may not be reproduced for any use that has not been authorized.

Software you may and may not use

You may use approved Company-owned or licensed software only if that use is job related. You may not use it for any personal use, even if you helped develop or enhance the software.

Owned or leased equipment

You may not use (or allow others to use) C.H. Robinson-owned or leased equipment for any personal use or any use other than for Company business without prior Company approval in writing.



Electronic Data and Communications Policy

Rights, responsibilities, and ethics

C.H. Robinson has provided electronic systems and services, including internet, email, voicemail, instant messaging, mobile phone access, stored messaging systems, and other electronic systems and forms of communications ("electronic systems") as tools for conducting Company business.

Responsible and ethical use of electronics

Access to Company assets or Company's electronic systems is a privilege that is approved by leadership and granted based on job responsibility. Use of these tools requires responsible and ethical use. By using the electronic systems provided by the Company, you agree and accept the terms of this policy and any other Company policy.

You must take care to ensure accessing the internet and other use of the Company assets or Company's electronic systems does not violate this policy or any other Company policy.

You are responsible for the proper use of Company assets, and must safeguard this property against loss, damage, misuse, or theft. You must return all Company property in proper working order upon termination from the Company. As allowed by law, you understand you may be held financially responsible for lost or damaged property and failure to return property will be considered theft and may lead to civil or criminal prosecution.

Authorization for use

Only team members and others expressly authorized by the Company may use the Company's electronic systems.

Team member rights and electronics

Nothing in this document is intended to prohibit your rights under any and all applicable laws. In addition, the Company will not construe or apply this policy in a manner that prevents employees from communicating with each other about the terms and conditions of their employment.

Company property – No expectation of privacy (as permitted by local law)

All electronic systems provided by the Company, all material or data created or stored on such systems, the email addresses assigned to team members, and all communications through or using these systems are the property of the Company.

You should have no expectation of privacy regarding any information stored in, created, received, or sent over Company assets, or the Company's electronic systems. Using passwords does not in any way diminish the Company's rights to access materials on its electronic systems or create any privacy rights of employees in the messages and files on such systems.

Intellectual property

Any intellectual property created by employees involving or related to C.H. Robinson business operations, including but not limited to patents, copyrights, inventions, trademarks, designs, domain names, trade names, articles, ideas, and concepts are the sole property of C.H. Robinson.

To the fullest extent permitted by law, employees agree to assign to C.H. Robinson all rights, title, and interest in any intellectual property developed. Employees shall promptly disclose to the Company any such intellectual property to enable proper protection and registration of these rights. Ownership of the intellectual property also applies to any application for rights of the property.

Observing local laws

Consistent with local laws, the Company, and other persons it may authorize (including governmental or law enforcement authorities) have the right to access, monitor, use, or disclose any data or files created or stored on its electronic systems, including information regarding the use of these systems (including internet sites accessed) and all messages created, sent, stored, or retrieved on these systems.

Unless applicable local law provides otherwise, you should have no expectation that any of this information, data, or communications is private or confidential.

Accessing employee electronics usage

As permitted by local law, the Company, and other persons it may authorize (including governmental or law enforcement authorities), routinely accesses, retrieves, and deletes your internet, email, voice mail, instant message, and other communication tool usage, including file attachments and internet sites visited or attempted to visit.

The Company monitors activities to promote safety and manage productivity, prevent criminal activity, investigate alleged misconduct and security violations, manage information systems, and for other business reasons.

Utilizing public GenAI tools

To protect personal and organizational data, employees must utilize Microsoft CoPilot Chat or AskBlue while logged into your Microsoft Enterprise Account, instead of public AI tools (e.g., ChatGPT through free portal).

You must continue following the C.H. Robinson GenAI employee guidelines for use of public AI tools, including all required employee trainings regarding the proper use of AI.

Employees are responsible for reviewing all AI-generated output to ensure it is accurate and unbiased and is not copyrighted, malicious, or fabricated before use.

Following C.H. Robinson policy

You are responsible for using all Company assets or electronic systems in accordance with this policy and all other Company policies. As additional forms of electronic and other communications become available, the Company will continue to monitor and manage those forms as well, as permitted by local law.

Acceptable uses of the internet and other electronic systems

C.H. Robinson provides its team members with email, internet, instant messaging, AI, and other electronic systems for business purposes. These systems may not be used in any way that may violate another Company policy. When you access these systems, you are representing C.H. Robinson and must only use these tools in an ethical and lawful manner.

Usage and communications should be for business reasons, including to:

- Facilitate performance of any task or project in a manner approved by your leader.
- Acquire information related to or designed to facilitate the performance of your regular assigned duties.
- Communicate with team members, vendors, or customers regarding matters within your assigned duties.

Approved gateway

All traffic to and from the internet must travel through the approved Company gateway to ensure reasonable security, virus protection, monitoring, and systems management capabilities.

Unacceptable uses of the internet and electronic systems

You may not attempt to gain access to information or data, including computer files or emails, of other team members to which you have not been given authorized access by the Company.

Likewise, any attempt to masquerade as another person, alter messages, or otherwise attempt to send a communication or create a document to make it appear as if it were created or sent by someone else is prohibited.

Specific unacceptable internet and electronic systems use

The Company's assets or Company's electronic systems may not be used to create, view, print, transmit, or download material that is defamatory, sexually related, sexually explicit, racist, or similarly offensive, including but not limited to slurs, pictures, cartoons, epithets, or anything that may be construed as harassment or discrimination based on any protected class.

Unauthorized / illegal uses

Unauthorized and illegal uses include unauthorized or secret recording of Company information or conversations and personal images of its employees, customers, and/or clients as permitted by federal and state law, gambling, violation of copyright, trademark or other material protection laws, copying of software in a manner inconsistent with vendor's license agreements, providing confidential Company or customer information outside of the Company, sending Company information or email to yourself at a personal email address or to a third party for purposes other than as authorized for furthering the legitimate business goals of the Company, or using internet based email services through Company assets or the Company's electronic systems.

Using Company electronics for personal gain

The Company's assets or Company's electronic systems may not be used for:

- Any illegal or unethical use.
- Personal gain such as solicitation of non-Company business, or on behalf of any political cause.
- The transmission of destructive files or programs (e.g., viruses, malware, or self-replicating code).

- Engagement in monetary gain, such as gambling, betting, personal investments, or payment, such as cryptocurrency mining.

Minimizing use of internet

Internet access consumes the resources of the Company's computer network, including network bandwidth and server processing. You should minimize use of real-time internet updates, audio and video streaming, and media (e.g., radio, TV; music files; downloading large files; mass emails; chain messages; and emails with large, attached graphics). Such usage can result in the loss of network efficiency for all employees and impede the system. Therefore, such use should remain minimal and business-related only.

Approved software

The use of executable files, programs, utilities, and third-party software shall be limited to the programs contained in the "Approved Software List" developed by the Technology Department. If additional software not contained in the Approved Software List is needed, such software must be evaluated, approved, and licensed by the Technology Department prior to download and/or installation. Contact the Technology Service Desk for assistance with software needs.

Opening electronic messages

You should not open electronic messages (mail, chat, text, etc.) or attachments unless they are expected from a known and trusted sender. Unexpected messages or attachments should be verified by the sender through a secondary method of communication before opening them. Report any suspicious messages (email or text) to Security or use tools like the Report Phishing button in Outlook.

Remote access users

Remote access to resources on the internal corporate network should be approved by leadership and based on job responsibility.

Authorized users may only gain access to the Company network through the Company's remote authentication process, including providing a network user ID and password as well as multi-factor authentication. Any additional remote access mechanisms are prohibited. All the provisions of this Electronic Data and Communications Policy apply fully to remote access use.

Using mobile devices

Devices enabling mobile operations, including but not limited to, tablets, smart phones, USB storage devices, etc. should be approved by leadership prior to use and are provided based on job responsibility.

Connecting personal devices and access to Company data (bring your own device policy)

Employees are permitted to use approved personal devices to access Company-approved systems and applications as part of their work. To ensure the security and integrity of Company data, all personal devices must comply with the Company's security policies, including the use of approved hardware, installation of required security software, and installing required updates. Employees are responsible for safeguarding their devices and reporting any security incidents or personal data breaches immediately.



Employees must comply with Company policies on appropriate use of confidential data, as well as policies governing the use and protection of personal information. The use of personal devices should not interfere with productivity or violate any Company policies. By using personal devices for work purposes, employees agree to adhere to all Company policies and guidelines and understand the Company reserves the right to monitor, manage, and remove access to its systems as needed.

Any data stored on approved devices should be considered confidential Company information. Any data, including personal, that is stored on a Company-approved device is not guaranteed to be returned to the employee upon termination from the Company. Any lost or stolen devices should be reported immediately to the Technology Service Desk.

Non-approved personal use devices should never be connected to the C.H. Robinson corporate network or its component systems.

Protecting confidentiality with passwords

The Company provides password security to team members to safeguard access to its systems and data. You are responsible for protecting the confidentiality of passwords. Passwords may never be stored in readable form on computers or written down and left in a place where unauthorized persons might discover them. You may never share passwords with other employees (including leaders) or individuals external to C.H. Robinson. Authorized options exist via the Technology Service Desk and Outlook in the event there is a valid business reason for a C.H. Robinson team member to access another team member's email information.

Violations of electronic systems

These policies are intended to provide you with general examples of acceptable and unacceptable uses of C.H. Robinson electronic systems.

A violation of this policy may result in disciplinary action up to and including termination. This also includes any damaged, lost, and/or stolen devices, including but not limited to laptops, mobile devices, or any other Company equipment or information as this causes significant risk to the Company. You also will be responsible for violations of this policy by others such as friends or family members, if you allowed or permitted their use of the Company's assets or the Company's electronic systems.

Requests for more information

C.H. Robinson will provide, on request, additional information regarding the C.H. Robinson Cybersecurity Policies. Requests can be made by contacting the Cybersecurity team with the subject line, "Cybersecurity Policy Request."

Communications and Media Relations Policy

Speaking for C.H. Robinson

Approved spokespeople may speak with media, but only in coordination with and approval from Public Relations. If you are an approved spokesperson and are contacted by the media, reach out to Public Relations before responding.

If you are not an approved spokesperson and are contacted by the media, politely inform them you are not authorized to comment on behalf of C.H. Robinson and instruct them to reach out to Public Relations.

Social networking/blogging policies

Additionally, you should not represent or suggest in any social media activity that you are authorized to speak for the Company, or that the Company has reviewed or approved your content.

Online social networking, blogging, or any other form of online publishing or discussion activities are subject to the Social Media Policy. You are personally responsible for what you write.

Remember that as soon as you identify yourself as being part of C.H. Robinson when online, you are in some way representing the Company. Write in the first person and use your personal email address for your social media activity, even if it relates to the Company, unless you have received prior authorization in writing from the Company. Personal social media posts should not be used to attack, abuse, or otherwise threaten any other C.H. Robinson employee or non-employee.

Disclosing company information

Do not disclose any information that is confidential or proprietary to the Company or to any third party that has disclosed information to us. Consult the Company's Asset Protection and Information Classification Policy within this Code for guidance about what constitutes confidential information. Do not use Company trademarks, logos, or reproduce Company material without permission on your personal social networking, blog, or other online publishing sites.

Sharing Company social networking posts, content from Robinson Social, or external Company information (like web pages, white papers, etc.) is allowed.

Posting policies

Be respectful to the Company, our team members, our customers, our partners, affiliates, and others (including our competitors). Do not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, or hateful to another person or entity.

This includes, but is not limited to, comments regarding C.H. Robinson, and C.H. Robinson team members, customers, suppliers, and competitors.

Making false statements

Do not make knowingly or recklessly false statements about the Company's products or services, or the products or services of its customers, vendors, or competitors. Do not post content, images, or video of yourself that identifies you as a Company team member and depicts you engaging in illegal conduct, such as acts of violence, illegal use of drugs, or conduct that violates any Company policy.

Suspending websites/blogs

Finally, be aware that the Company may request you confine your website or blog commentary to topics unrelated to the Company (or, in rare cases, that you temporarily suspend your website or blog activity altogether) if it believes this is necessary or advisable to ensure compliance with securities regulations or other laws.



Designated Spokesperson Policy

Clear, accurate, and complete communications

The C.H. Robinson policy is to make:

- Clear, accurate, complete, timely, and consistent disclosure of material information (any information that a reasonable investor would consider important when deciding whether to buy, hold, or sell stock) about the Company.
- Previously non-public, material information available to all segments of the market. This is true for all situations where information is conveyed, no matter how informally.

C.H. Robinson executive spokespersons

C.H. Robinson has centralized material disclosure by appointing designated executive spokespersons who are the only C.H. Robinson personnel authorized to provide broadly disseminated information about C.H. Robinson outside the Company.

The designated spokespersons are the Chief Executive Officer, the Chief Financial Officer, the Senior Director of Investor Relations, and the Chief Communications and Marketing Officer. All contact with the media and the investment community (e.g., press releases, answers to reporter's questions, etc.) related to material information must go through the Public Relations information distribution channels.

The C.H. Robinson policy is to channel the disclosure of material information about the Company through specifically authorized and designated executive spokespersons. Officers or team members who receive requests for media interviews must contact Public Relations who will partner with the spokesperson to determine whether C.H. Robinson will proceed with the interview.

Non-material information

For all media inquiries related to non-material information, only C.H. Robinson approved spokespeople are authorized to represent the Company to media and other external communication outlets, and for other speaking opportunities, in coordination with and approval from the Public Relations team.

Additional guidelines and expectations can be found in the Global Spokesperson Policy.

Legal review before distribution

In addition, the Legal Department must review and approve all Company communications materials before they are distributed externally. This includes materials such as sales brochures, sales presentations that include new information that has not been previously approved, websites, advertisements, and newsletters.

This legal review ensures that:

- Information is accurate.

- Confidential, non-public information is not inadvertently disclosed.
- We provide as much consistency as possible in our external communications.

For additional guidance and expectations regarding materials distributed externally, contact Public Relations.

Disclosure policies

C.H. Robinson has several disclosure policies you should understand. These policies include that C.H. Robinson does not:

- Disclose Company information unless legally required to do so
- Discuss possible future financial performance except in very general terms
- Discuss pending rate activity, tariff filings, etc., until all appropriate parties have been notified
- Disclose information about team members other than biographical information for certain key team members

Posting authorization

Only authorized team members can make postings to Company-sponsored external websites and social media channels. Online social networking, blogging, or any other form of online publishing or discussion activities on websites that are not Company-sponsored are individual communication exchanges, and are not corporate communications. Remember that as soon as you identify yourself as being part of C.H. Robinson online, you are in some way representing the Company.

Only the Company-designated spokespersons are authorized to broadly disseminate material information about C.H. Robinson outside the Company. All team members are encouraged to share Company social networking posts, content from Robinson Social, or external Company information (like web pages, white papers, etc.)

Questions or concerns relating to this section

Resources

[Human Resources](#)

[Anonymous Reporting Process](#)

[Technology Service Desk](#)

[Public Relations](#)

[Legal Department](#)

[Privacy Department](#)

[Cybersecurity](#)

Additional policies associated with this section

[Technology Policies](#)

[Cyber Security Policies](#)

[Global Data Privacy Notice](#)

[Global Employee Privacy Notice](#)

[Global Monitoring Notice](#)

[Record Retention Policy and Schedule](#)

[Human Resources Data Governance Policy](#)

[Social Media Policy](#)

[GenAI employee guidelines](#)

[Global Spokesperson policy](#)

Conducting business fairly

Conflicts of Interest Policy

Personal conflicts of interest

You must not engage in activities where personal interests conflict or have the appearance of conflicting with the interests of C.H. Robinson.

Whether a conflict exists is to be decided by the Legal and Human Resources Departments. Personal interest means any interest, whether financial or otherwise, that would, or would appear to, influence a judgment or decision in favor of another party dealing with C.H. Robinson.

Soliciting/receiving compensation

Neither you nor any member of your family shall solicit or accept from an actual or prospective customer, carrier, direct supplier (grower), or any third-party supplier of goods/services (i.e., office/warehouse consumables, professional services, etc.), any compensation; advance; loans (except from established financial institutions on the same basis as available to other customers); gifts; entertainment; donations; or other favors that are of more than minimal or nominal value, generally around \$250 USD (annual maximum in aggregate from a single vendor) or that the employee would not normally be in a position to reciprocate under standard Company expense account procedures. Cash or gift cards should never be accepted for any dollar amount.

- You should not accept small gifts on a regular or continual basis.
- When giving gifts, make sure they are in keeping with the business relationship and do not appear to be attempts to obligate or influence the recipient.
- Do not offer any gift, favor, travel, or entertainment if it is against the policy of the recipient's organization. Many companies have policies that do not allow any gifts.
- In the case of the government, the offer of anything, sometimes even a cup of coffee, may be against the law. Review the policy on dealing with government.
- Do not give or accept any gift from a third-party supplier currently in an active bidding, negotiation, or contracting phase with C.H. Robinson. Please reach out to Indirect Procurement if in doubt.

This does not include normal business entertainment items such as meals and beverages, contributions, or donations to recognized charitable and non-profit organizations on a personal level.

If a gift is of such a nature that it will influence your independent judgment to act in the best interest of the Company, it is inappropriate. Offering or taking bribes, kickbacks, payoffs, or other unusual or improper payments to obtain or keep business is unethical, illegal, and strictly forbidden.

Hosted events

The Company understands special circumstances may require you to participate in events hosted by a customer, supplier, or carrier for educational or informational purposes. This policy does not prohibit participation in such events.

Prohibited conduct

You must not:

- Request employee participation in gambling pools.
- Act in a manner that would affect your objectivity in carrying out your Company responsibilities.
- Directly or indirectly benefit, or seek to benefit, from your position as a team member from any sale, purchase, or other activity of the Company.
- Do business on behalf of the Company with a close friend or relative; however, recognizing that such transactions sometimes occur, they must be reported to a leader.
- Ask for contributions, hold fundraising drives, or request support for political activities, non-profits, or for any outside organizations or individuals (i.e., GoFundMe accounts).
- No team member who deals with individuals or organizations doing, or seeking to do, business with the Company or who makes recommendations with respect to such dealings may have any other direct or indirect personal interest in any business transaction with the Company.
- Engage in outside employment that would conflict with Company business hours or the performance of Company assignments. You must not use Company time, materials, information, or other assets in connection with outside employment or other personal business interests prohibited by this policy.
- Be employed outside the Company or serve as an officer, director, or consultant or have an economic interest that could, or might reasonably be thought to, influence judgment or action in any business that competes with, provides services, or seeks to provide services to the Company. (An investment representing less than two percent of a class of outstanding securities of a publicly held corporation is not a conflict of interest.)

Participating in Public Service/ Charitable Activities

You are encouraged to participate in public service and charitable activities so long as they do not create actual or potential conflicts with your duties to the Company. Prior to service, review the policies included in this Code of Ethics, including the Asset Protection and Information Classification Policy and the Communications and Media Relations Policy, as your compliance is required when serving in any capacity in an external organization.

Before accepting an appointment in public service, serving on the board of a charitable institution, or running for political office, you must obtain approval from your leader and the Legal Department and include "External Board Service Approval Request" in the subject line.

C.H. Robinson supports its team members' participation as directors of for-profit corporations, provided such participation does not create a conflict of interest or implicate other Securities and Exchange Commission (SEC) concerns. Service on for-profit boards must be approved by the Chief Legal Officer (CLO) and Chief Executive Officer (CEO). Reach out to the Legal Department to start your approval request as noted above.

Employment of friends and relatives

C.H. Robinson welcomes friends and family members to be considered for employment under the usual hiring policies. However, to prevent situations of actual or perceived favoritism or conflict of interest, family members and employees in a romantic relationship may not have working relationships that:

- Control or influence the terms and conditions of employment.
- Create a direct or indirect supervisor/subordinate relationship.
- Have the potential to create an adverse impact on individual or teamwork performance.

Any familial relationship may be included as part of this policy, where there may be, or a perception may be created of favoritism, influence, and/or preferential treatment. Each situation will be evaluated as appropriate.

Defining family members

Family members include, but are not limited to, your spouse, parent, children and their spouses, brother, sister, or the same by marriage. Also included are, aunt, uncle, niece, nephew, grandparent, grandchild, and other members of your household. Also included are romantic relationships and "step" or "half" family relationships.

Family members working together

If family members work together and it creates any supervisor-subordinate relationship due to a transfer or promotion, the Company will attempt to transfer the employee to another available position for which the employee is qualified.

If you are aware of or are involved in any actual or potential conflict of interest as noted above, you must disclose it to your leader and/or Human Resources immediately.

Employees who become family members

Employees who become immediate family members or establish a romantic relationship may continue employment in their current position if it does not involve one of the conditions above.

Should one of the above conditions occur, the Company will attempt to transfer one of the employees to an available position for which the employee is qualified. If a transfer is not feasible, the employees will be permitted to determine which of them will resign. If the employees cannot decide, C.H. Robinson will decide who will remain employed.

Loans and pay advancements prohibited

C.H. Robinson prohibits loans or advancement of pay directly from the Company to employees or their families.



Advertising and Marketing Policy

Aggressive vs. misleading advertising

The C.H. Robinson policy does not allow use of any false or misleading advertising or unlawful sweepstakes or promotional giveaways in connection with the sale or marketing of products or services.

It is appropriate to advertise C.H. Robinson products aggressively using techniques such as price comparisons or sales or to develop lawful sweepstakes or promotions; however, these techniques should only be used if they are lawful and not false, deceptive, or misleading.

Sweepstakes and giveaways

The advertising of products and services and the marketing of such products and services using sweepstakes and/or promotional giveaways is subject to numerous laws and regulations.

Seeking legal advice

If you participate at all in advertisement, sweepstakes, and/or promotional giveaways, and you have concerns regarding the legality of any advertising of C.H. Robinson products or services, then you are encouraged to seek legal advice from the Legal Department.

Marketing and sales practices must comply with applicable laws including privacy, commercial electronic messaging, do not call, etc. Contact the Privacy Department or the Legal Department for guidance.

Avoiding false or deceptive advertising

The C.H. Robinson policy is to avoid any price advertising that is false or deceptive. Price or value comparisons of products offered by C.H. Robinson with products offered by our competitors are generally permissible if genuine and truthful.



Compliance With Insider Trading Policy

All team members are subject to insider trading laws

The Company's policy is to comply fully with the laws on insider trading. If you have knowledge of insider information and/or if you trade in C.H. Robinson securities or the securities of other companies trading on the U.S. stock exchange, you are subject to U.S. securities laws, as well as any other securities or insider trading laws that may apply to you locally. While these laws apply to everyone, certain individuals are formally designated by the Company as financial insiders and are subject to additional obligations of which they are notified.

The following information is a summary only, and you are responsible for reviewing and adhering to the Insider Trading Policy in its entirety.

Prohibition on trading when aware of material non-public information

The policy prohibits a director, officer, employee, or consultant (a "team member") of C.H. Robinson Worldwide, Inc. who is aware of material non-public information relating to the Company from directly or indirectly through family members or other persons or entities:

- Buying or selling securities of the Company (other than pursuant to a Rule 10b5-1 Program, as described below) or engaging in any other action to take personal advantage of that information
- Passing that information on to others outside the Company, including family, friends, or affiliated entities

In addition, the policy prohibits all team members from trading in another company's securities while the team member is aware of material non-public information concerning that company or its securities when that information was obtained in the course of a team member's service to the Company. These other publicly traded companies may include customers, suppliers, competitors, or potential merger or acquisition parties.

Material information defined

Material information is any information that a reasonable investor would consider important in deciding to trade in securities. Any information that could be expected to affect the Company's stock price, whether it is positive or negative, should be considered material. Common examples of information that may be regarded as material include:

- Certain changes in leadership
- Projections of future earnings or losses
- Significant new products or discoveries
- Significant litigation or regulatory actions
- Significant cybersecurity or data security incidents
- Impending bankruptcy or financial liquidity problems
- The gain or loss of a substantial customer or supplier
- Changes in auditors or any restatement of financial statements

- News of a significant sale of assets or the disposition of a subsidiary
- Information about a transaction that will significantly affect the financial condition of a company
- Changes in dividend policies or share repurchase plans or the declaration of a stock split or the offering of additional securities

When information is "public"

If you are aware of material non-public information, you may not trade until the information has been disclosed broadly to the marketplace (such as by press release or an SEC filing) and the investing public has had time to absorb the information fully.

Information should not be considered fully absorbed by the marketplace until two full trading days have passed following public disclosure of the information. If, for example, the Company were to make an announcement on a Monday, you may not trade in the Company's securities until Thursday. If an announcement were made on a Friday, then Wednesday generally would be the first eligible trading day.

Trading periods

The Company's policy is to prohibit certain financial insiders from trading during a closed period, and to require pre-clearance of all trades, including during open quarterly trading windows, by financial insiders. Pre-clearance for financial insiders must be obtained by the Chief Executive Officer, Chief Financial Officer, and the Chief Legal Officer, or their designee.

Financial insiders include all directors, executive officers, and other team members with access to financial reporting information who are identified on a quarterly basis.

Financial insiders may purchase or sell Company securities only during a quarterly trading window, which shall open after two full trading days have passed following the release of quarterly earnings results to the public and shall remain open through the last day of the second month of the quarter.

Transactions by family members or others

The Insider Trading Policy also applies to:

- Family members who reside with you, anyone else who lives in your household, and any family members who do not live in your household but whose transactions in Company securities are directed by you or are subject to your influence or control (such as parents or children who consult with you before they trade in Company securities).
- Entities (e.g., family trusts, foundations, partnerships, LLCs, corporations, or similar entities) whose transactions in Company securities are directed by you or are subject to your influence or control.

You are responsible for the transactions of these other persons or entities and therefore should make them aware of the need to confer with you before they trade in the Company's securities.

In addition, you must not communicate material non-public information to any person who does not need that information for a legitimate business purpose or recommend to anyone the purchase or sale of securities when you are aware of material non-public information about the company involved. This practice, known as “tipping,” also violates the securities laws and can result in the same penalties that apply to insider trading, even if you did not actually trade or benefit from another’s trading.

Event-specific blackout periods

From time to time, an event may occur that is material to the Company and is known by only a few directors, officers, or other employees. In such an event, the Chief Legal Officer, Assistant Secretary, or their designee will identify and designate persons aware of the event who may not trade in the Company’s securities.

Any person made aware of the existence of an event-specific blackout should not disclose the existence of the blackout to any other person. The failure of the Chief Legal Officer, Assistant Secretary, or their designee to designate a person as being subject to an event-specific blackout will not relieve that person of their obligation not to trade while aware of material non-public information.

Pre-arranged trading programs

A financial insider who has established a pre-arranged trading program (a “10b5-1 Program”) may sell or purchase Company securities while in possession of material non-public information or during other periods in which the Company has required or recommended the suspension of trading, so long as any sales or purchases are made pursuant to a 10b5-1 Program that:

- Meets the requirements of Rule 10b5-1 promulgated under the Securities Exchange Act of 1934
- Was established at a time when the financial insider was not in possession of material non-public information
- Was approved in advance by the Company’s Chief Executive Officer, Chief Financial Officer, and Chief Legal Officer, or their designee

Gifts

Gifts of Company securities by a team member are permitted, subject to the following conditions:

- The gift of Company securities is made to a team member who is also subject to the provisions of the Company’s policy; or
- The team member has a reasonable basis to believe the recipient of the gift will not sell the Company’s securities during any applicable closed trading window in effect for the team member donor at the time of the gift.

All other gifts of Company securities must comply with the provisions of this policy that apply to sales of Company securities since the recipient may intend to sell the shares upon receipt.

Prohibition on speculative, derivative, and hedging transactions

Team members and their family members may not engage in speculative or derivative transactions involving Company securities. This includes short sales; transactions in puts, calls, or other options; or any hedging or monetization arrangement—such as equity swaps, zero-cost collars, prepaid forward contracts, exchange funds, or similar strategies—designed to offset or limit decreases in the value of Company stock. These activities conflict with the Company’s expectations of ethical conduct and alignment of interests and are prohibited at all times.

Violations of policy

Failure to comply with the Company’s Insider Trading Policy may subject a team member to Company-imposed sanctions, including termination of employment or removal from the Board for cause, whether or not the failure to comply results in a violation of law.

Who to call for assistance?

If you have questions about our Insider Trading Policy or its application to any proposed transaction, contact the Legal Department. Ultimately, however, the responsibility for adhering to our Insider Trading Policy and avoiding unlawful transactions rests with the individual director, officer, or other team member.

Policy on dealing with government

Complying with contract regulations

The C.H. Robinson policy is to comply fully with all regulations and laws related to entering into a contract with the government, and which governs contracts and dealings with government employees and officials.

Legally required information

Businesses engaged in contracting with the government are legally required to report certain information relating to contract negotiation, and specifically to cost and pricing. This information must be current, accurate, and verifiable.

Maintaining up-to-date information

The contract must also be complete up to date, including the date of the contract. During contract negotiation with the government, you should be prepared to forthrightly disclose the significance of all material information. All statements, correspondence, and other communications should be accurate and truthful.

Special laws for government employees

Government employees, including government procurement officials, whether at the national, state, or local government levels, are subject to special laws and regulations governing their receipt of gifts and gratuities from organizations with which they do business.

Nominal gift giving

As stated in the Corporate Worldwide Anti-Bribery and Anti-Corruption Policy of this Code, any nominal gift giving (e.g., C.H. Robinson T-shirts) or meals, etc., between a C.H. Robinson team member and a government official is permissible only if it is lawful under the written laws and regulations of the specific country in which it occurs, is tied to a legitimate business purpose, and there is no corrupt intent.

Refer to the Corporate Worldwide Anti-Bribery and Anti-Corruption Policy in this Code for what is a nominal or acceptable gift. Where doubt or uncertainty exists, you should contact the Legal Department.

Laws regarding conflicts of interest

Federal law governs the appearance of conflict in the employment of or contract with former government employees who go to work for government contractors, as an employee or contractor. Before you hire or contract for the services of any former government employee, you should clear the hiring with the Legal Department.

Future employment with C.H. Robinson

Discussions with government employees regarding future employment with C.H. Robinson can provide the appearance of improper influence. You should never discuss the possibility of future employment with:

- Any government employee who is involved in the negotiation, execution, and/or administration of a government contract with whom C.H. Robinson is associated.
- Any government employee who is involved in the regulation of any industry in which C.H. Robinson conducts business.

Recording costs/charging the government

Proper procedures need to be followed when recording costs and charging the government. These procedures are particularly important to make sure all costs are allocated to the proper account. It is never proper to charge other accounts.

If it becomes necessary to transfer a charge, the transfer should be carefully documented and recorded. Incorrectly charging costs is a federal offense.

Laws regarding soliciting government employees

Federal and state law prohibits parties seeking government contracts from soliciting or obtaining from government employees any "proprietary or source selection" information (information about bids by competitors or information regarding the procurement process that would adversely affect the fairness of the process) regarding a government contract.

This means you are prohibited both from attempting to obtain the information from the official, as well as receiving the information even when the government employee is willing to disclose it.

Working with the Legal Department

The C.H. Robinson policy is that all government requests for interviews or documents be referred to the Legal Department to facilitate a prompt and thorough response to the government. All law enforcement requests for personal data must be routed to Legal and Privacy. No personal data may be disclosed without Legal's review and written authorization.

Your rights and government requests

You are entitled to have counsel present to advise and assist you in responding to governmental requests for information or documents. Therefore, any time you are approached by someone claiming to be a government investigator, you should contact the Legal Department before answering any questions or producing any documents. Team members who are participating in government interviews are responsible for giving answers that are truthful, complete, concise, accurate, and unambiguous.

Laws regarding political contributions

The C.H. Robinson policy is to comply with all federal, state, local, and foreign laws regarding political contributions. When corporate political contributions are legal, contributions shall be made only from funds allocated for that purpose and only with the written approval of the Chief Executive Officer at C.H. Robinson.

Personal political activities

All team members must avoid the appearance of involving C.H. Robinson in their personal political activities. If a planned contribution or activity could in any way be looked upon as involving Company funds, property, or services, you should consult the Legal Department.

When you speak out on public issues or attend political rallies, protests, or events, make sure you do so as an individual. You should not give the appearance you are speaking or acting for C.H. Robinson.

Anti-Money Laundering Policy

Prohibitions on illegal funds

Money laundering in any form is strictly prohibited by C.H. Robinson. Under no circumstances should any team member participate in or allow the commencement of any transaction at C.H. Robinson that involves any funds that the employee knows, or suspects were illegally obtained.

If a team member suspects a proposed transaction or transfer involves illegally obtained funds, they should decline to execute the transaction or transfer and report the situation to their leader or the Legal Department.

Fair Competition and Corporate Comments Policy

Fair Competition Policy

The C.H. Robinson policy is to sell our products and services on their merits, not through the disparagement of our competitors, their products, or services. False, misleading, or disparaging remarks about individuals or their organizations, products, or services are against Company policy. The C.H. Robinson policy is not to interfere in the business relationships of our competitors.

False and misleading comments

No team member should make false, misleading, or disparaging comments about any competitor or their products or services. Just as we want to avoid competitors commenting unfairly about C.H. Robinson, we want to avoid commenting unfairly about them.

When a customer (or prospective customer) tells C.H. Robinson they have a contract for service with a competitor, C.H. Robinson employees then must do nothing to interfere with or cause a wrongful breach of that contract.

Three competitive rights rules

C.H. Robinson follows three rules on working with customers involved in contract negotiations with competitors.

- Until a customer or prospective customer has reached a mutual agreement with a competitor, C.H. Robinson has a right to compete fairly and aggressively for that customer's business.
- C.H. Robinson team members are not obligated to accept the statements of a competitor as to the status of negotiations with a customer or prospective customer, nor must we accept the statements of a competitor as to the existence of a contract.
- C.H. Robinson team members have a right to communicate directly with a customer or prospective customer as to the status of negotiations or contracts between that party and competitor.

Corporate Worldwide Anti-Bribery and Anti-Corruption Policy

Compliance with Foreign Corrupt Practices Act and other global equivalent statutes

The C.H. Robinson policy is that all employees comply with the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act of 2010, the OECD Anti-Bribery Convention, or any country's equivalent anti-bribery, anti-corruption statute or program ("the anti-bribery and anti-corruption laws").

The anti-bribery and anti-corruption laws prohibit companies and individuals from, directly or indirectly, offering money or anything of value to a foreign official in order to obtain or retain business or gain an unfair advantage of any kind (i.e., Bribery Provision).

No exceptions to the anti-bribery and anticorruption laws

There are no exceptions to this prohibition and any such payment is a violation of this C.H. Robinson Code of Ethics and illegal under the anti-bribery and anti-corruption laws.

The anti-bribery and anti-corruption laws also require companies like C.H. Robinson to accurately and correctly reflect in our internal controls and accounting provisions and books, all payments received, reason for payments made, and party making payment and/or receiving payment (i.e., Accounting Provision).

Compliance with the anti-bribery and anti-corruption laws is a priority

C.H. Robinson places a priority on complying with the Anti-bribery and Anti-Corruption Laws as evidenced by our written Code of Ethics and Corporate and Worldwide Anti-Bribery and Anti-Corruption Policy, our computer-based Anti-Bribery and Anti-Corruption Training with test, and our live onsite training given in different countries throughout the world such as China, India, Argentina, Brazil, Sri Lanka, Thailand, Vietnam, Mexico, etc.

If you have any questions, comments, or concerns related to this section of the Code of Ethics, or if you experience something that poses a potential violation of it, immediately contact the Legal Department for assistance.

Bribery Provision

To understand the Bribery Provisions of the anti-bribery and anti-corruption laws and how it applies to C.H. Robinson, you need to understand the various parts of the rule:

A Company and its personnel cannot, directly or indirectly, give, offer, or promise money or anything of value to a foreign official with a corrupt intent.

What is meant by “money or anything of value?”

The anti-bribery and anti-corruption laws recognize that bribes can come in many shapes and sizes—a broad range of unfair benefits—so the laws prohibit the corrupt “offer, payment, promise to pay, or authorization of the payment of any money, gift, or anything of value to” a foreign official.

An improper benefit or “value” can take many forms. While cases often involve payments of cash (sometimes in the guise of “consulting fees” or “commissions” given through intermediaries), others have involved travel expenses, expensive gifts, or lavish entertainment.

Gifts with intent

Giving gifts or paying for meals, travel, and entertainment made with a corrupt intent in return for official acts to obtain or retain business or gain an unfair advantage are not allowed and impermissible. It is important to note that most laws like the FCPA do not contain a minimum threshold or certain dollar amount for corrupt gifts or payments.

Prohibited expenditures

Under this policy in this Code of Ethics, C.H. Robinson prohibits expenditures or payments made by team members to foreign officials for any gifts, meals, entertainment, travel, and/or lodging expenses exceeding one hundred U.S. dollars (\$100.00 USD) per occurrence per person. Any payment to exceed \$100.00 USD requires review and prior approval by the Legal Department.

Who is a “foreign official?”

Generally, the anti-bribery and anti-corruption laws’ Bribery Provisions apply to corrupt payments made to any:

- Foreign official
- Candidate for foreign political office
- Foreign political party or official thereof
- Person, while knowing that all or a portion of the payment will be offered, given, or promised to an individual falling within one of these three categories

Although certain laws distinguish between a “foreign official,” “foreign political party or official thereof” and “candidate for foreign political office,” the term “foreign official” generally refers to an individual falling within any of these categories as it is a very broad definition. For example, the FCPA defines “foreign official” to include any officer or employee of a foreign government or any department, agency, or instrumentality thereof; or of a public international organization; or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality; or for or on behalf of any such public international organization.

Corrupt payments

As this language makes clear, the anti-bribery and anti-corruption laws broadly apply to corrupt payments to “any” officer or employee of a foreign government and to those acting on behalf of the foreign government. The anti-bribery and anti-corruption laws thus cover corrupt payments to low-ranking officials and high-level officials alike. The anti-bribery and anti-corruption laws prohibit payments to foreign officials, not to foreign governments.

That said, companies contemplating contributions or donations to foreign governments should take steps to ensure no monies are used for corrupt purposes, such as the personal benefit of individual foreign officials.

The term “foreign official” also includes any government conducting commercial activities through a state-owned enterprise (SOE). This type of active government involvement is typically, but not always, common in aerospace, defense, transportation, healthcare, and telecommunications. The more ownership and/or control a government exercise over the entity, the more likely it will be a government run SOE, and thereby their employees will fall within the definition of foreign official for purposes of these laws.

Third parties (representatives, agents, and intermediaries)

Even if no payment or gift is made to a foreign official, payments made to third parties such as representatives, agents, and intermediaries may constitute a violation of the anti-bribery and anti-corruption laws, if an individual is aware there is a substantial certainty the third party will engage in an improper action to influence a foreign official by passing on all or a portion of the payment to the foreign official.

Defining “knowing”

Under the anti-bribery and anti-corruption laws a person “knows” in regard to certain conduct or circumstances if the person is:

- Aware they are engaging in such conduct, that such circumstance exists, or such result is substantially certain to occur.
- Has a firm belief such circumstance exists or such result is substantially certain to occur.

Therefore, C.H. Robinson team members should be careful and look for certain potential “red flags” when dealing or using third parties such as:

- Media reports
- Unusual rebates
- Unusual bonuses
- Requests for checks payable to “cash”
- Unusually large or small commissions
- The country in question is known for bribery
- Third parties’ relations with government officials
- The reputation of the local agent or representative
- Third-party consulting agreements that include only vaguely described services

Other Suspicious Conduct

What is “corrupt intent?”

Intent to properly influence the foreign official to get them to do something they normally would, or would not do, but for the money or something of value being given to them is when corrupt intent can be inferred.

Offering money or anything of value with the expectation of receiving something in return is wrong and prohibited (i.e., corrupt intent). Conversely, a small gift or token of esteem or gratitude is often a way for businesspeople to display respect for each other.

Promotional items

When offering any C.H. Robinson promotional or marketing items like pens, hats, cups, etc., corrupt intent cannot be inferred. If U.S. Customs visits C.H. Robinson as part of a legitimate business meeting and a team member buys them lunch, there is no corrupt intent.

In these scenarios, C.H. Robinson is not giving or offering something of value with the idea or expectation of receiving something from a foreign official in return.

What is a “facilitation payment?”

A facilitation payment is not a bribe per se and, therefore, not a violation of the FCPA. A facilitation payment is a small nominal payment made to a foreign official to expedite a routine governmental action. A facilitation payment is more akin to a “speed” or “expediting payment.”

What is and is not defined in the FCPA?

The FCPA does not define what amount is nominal or what amount constitutes a facilitation payment. A routine governmental action is a nondiscretionary act ordinarily and commonly performed by a foreign official but does not include a decision by the foreign official to award new business or to continue to do business with C.H. Robinson (e.g., processing governmental papers such as visas or work orders, providing police protection, and mail pickup are all routine governmental actions).

Permissible facilitation payments

C.H. Robinson discourages and advises against such facilitation payments and only in a rare situation will a facilitation payment be permissible. C.H. Robinson only allows a facilitation payment in the amount of fifty U.S. dollars (\$50 USD) or less per occurrence. Any situation requiring a payment above this amount requires prior approval of the Legal Department. C.H. Robinson also requires any person who makes such a payment must properly record and note it as such (“FCP”) in our books, records, and accounts.

Accounting provision

The anti-bribery and anti-corruption laws require C.H. Robinson to maintain a system of internal accounting controls to ensure assets are safeguarded, transactions conform to leadership’s authorizations, and accounting records are complete and accurate. The anti-bribery and anti-corruption laws forbid a person from falsifying accounting records and making misleading financial statements to auditors (e.g., in the United States the U.S. Securities and Exchange Commission (SEC)). These accounting standards and recordkeeping requirements apply to all employees of C.H. Robinson located around the world.

C.H. Robinson employees must always strictly comply with the accounting standards within the anti-bribery and anti-corruption laws and C.H. Robinson internal accounting controls, including those requirements set out in the C.H. Robinson Accurate Books and Records Policy. In furtherance of these standards, the following principles illustrate requirements that will govern C.H. Robinson team members’ actions.

- No false, artificial, or misleading entries in the books and records shall be made.
- No undisclosed or unrecorded funds or assets shall be established or maintained.
- Transactions shall be executed in accordance with leadership’s general or specific authorization.
- Access to assets shall be permitted only in accordance with leadership’s general or specific authorization.
- Team members certifying the correctness of the records, including vouchers or bills, shall have reasonable knowledge that information is correct and proper.
- The recorded accountability for assets shall be compared with the existing assets at reasonable intervals, and appropriate action is taken with respect to any difference.
- All financial and accounting records of C.H. Robinson shall be maintained to reflect accurately, openly, and completely the operations and transactions of C.H. Robinson.
- No payment shall be made with the intention or understanding that all or any part of it is to be used for any purpose other than that described in the documents supporting the payment.

- Transactions shall be recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles and the requirements of any government auditor (e.g., SEC) and to maintain accountability for assets.

The above requirements and principles are illustrative only. If you have any questions or concerns about the Accounting Provision and record-keeping requirements, you should contact the C.H. Robinson controller or director, internal audit.

Embargo and Sanction Policy

Business prohibited with sanctioned countries

C.H. Robinson strictly prohibits business with countries subject to embargoes or sanctions imposed by the U.S. Government, unless explicitly authorized by a U.S. Government-issued license. Additionally, transactions involving denied or restricted entities are not permitted unless authorized by applicable government agencies. C.H. Robinson has a profound interest in supporting the policies of the United States. We realize that violation of U.S. sanctions policies, export control law, and regulations can subject C. H. Robinson and its employees to severe penalties, including fines, blocking of assets, seizure, forfeiture of products, and civil and criminal penalties.

Both the U.S. Treasury Department, Office of Foreign Assets Control ("OFAC") and the U.S. Commerce Department, Bureau of Industry and Security ("BIS") impose restrictions on U.S. persons and companies from engaging in certain transactions. These restrictions may apply to specific countries, individuals, entities, vessels, aircrafts, and commodities, based on their classification, end use, or destination.

OFAC sanctions

OFAC enforces comprehensive embargoes against Cuba, Iran, Syria, and North Korea. As of the day of this policy, OFAC enforces comprehensive, country-wide embargoes against the following jurisdictions:

- Cuba
- Iran
- North Korea
- Crimea, DNR, LNR (regions of Ukraine)

These programs impose near-total prohibitions on trade, financial transactions, and services involving these countries unless expressly authorized by OFAC through a general or specific license.

As a U.S.-based organization, C.H. Robinson recognizes these embargoes present the highest compliance risk, and C.H. Robinson is committed to strict adherence to these regulations. Conducting work in these locations, including logging into our systems, even when no work is conducted, in any embargoed location is prohibited.

Additionally, there are significant sanctions targeting Russia and Belarus at the time of this policy's publication.

Additionally, OFAC maintains extensive targeted and sectoral sanctions targeting Russian Federation and Belarus and enforces comprehensive sanctions with respect to the "covered territories" of Ukraine, e.g., Russia-occupied parts of Donetsk, Luhansk, Zaporizhzhia, and Kherson regions of Ukraine. In addition, the following countries are considered high-risk jurisdictions from a sanctions and export-compliance perspective: Afghanistan, Myanmar, Nicaragua, Somalia, Sudan, South Sudan, Syria, Venezuela, Yemen. Sanctions against these countries are subject to frequent updates, and any questions or concerns regarding business involving these nations must be directed to the export compliance team for review.

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U.S. persons definition

For purposes of U.S. sanctions and export control laws, the definition of "U.S. Persons" generally includes U.S. citizens, U.S. permanent resident aliens, entities organized under U.S. law, foreign branches of U.S. companies that are not separately organized under local law, and any persons regardless of nationality physically within the United States. As a U.S.-based Company,

C.H. Robinson expects all employees, wherever located, to comply with U.S. sanctions and export control laws applicable to U.S. persons.

The existing C.H. Robinson policy

Under the C.H. Robinson Global Forwarding Sanction and Embargo Country Guide, any transaction involving embargoed or sanctioned countries requires prior review and approval by the export compliance team. Shipments must be accompanied by proper U.S. Government authorization, such as a license, before C.H. Robinson can provide services. This policy applies globally across all Company locations and divisions.

Corporate screening process

In addition to its Global Forwarding Sanctions and Embargo Country Guide, C.H. Robinson maintains a robust Denied Party Screening (DPS) program covering all transactions, including exports, imports, and foreign-to-foreign shipments.

In furtherance of our commitment to compliant business practices, all relevant parties to a transaction—such as shippers, consignees, and intermediaries—are screened against applicable U.S. and international restricted party lists, including the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons List

The Denied Party Screening program is centrally managed by the global forwarding export compliance team and is integrated into C.H. Robinson operating systems. While administered within the global forwarding compliance function, the program applies enterprise-wide across all C.H. Robinson divisions, including Global Forwarding, North American Surface Transportation (NAST), and Robinson Fresh, ensuring consistent and standardized screening controls throughout the organization.

The global forwarding export compliance team is responsible for reviewing and documenting each screening within the system to support auditability and regulatory transparency. If a potential match to a restricted or prohibited party is identified, the transaction is immediately placed on compliance hold pending further review. In certain instances, a positive match may relate to a party independent of a specific transaction; in such cases, the appropriate internal stakeholders are promptly notified for further assessment and resolution. Transactions involving confirmed or escalated matches may not proceed without formal review and approval from the export compliance team. Where appropriate, the export compliance team promptly notifies the responsible office personnel and relevant stakeholders to ensure proper resolution and documentation.

Through structured screening protocols, escalation procedures, documentation controls, and centralized oversight, C.H. Robinson is committed to maintaining the highest standards of export controls and sanctions compliance and mitigating risks associated with restricted parties, embargoes, and sanctions programs.

Access restrictions while traveling to high-risk jurisdictions

In addition to sanctions and embargo restrictions, C.H. Robinson prohibits employees from bringing Company-issued devices into, or accessing C.H. Robinson systems from, certain high-risk jurisdictions while physically present in those locations, including during transit. These restrictions apply regardless of whether access is attempted using Company-owned or personal devices. Accessing Company systems from these jurisdictions may violate U.S. sanctions or export control laws and expose C.H. Robinson and its employees to significant legal, financial, and reputational risk.

As a U.S. Company, C.H. Robinson employees are considered "U.S. persons" under the U.S. Department of Treasury's Office of Foreign Assets Control (OFAC) regulations, regardless of citizenship or location. That means we're all responsible for complying with U.S. laws, regulations, embargoes, and sanctions at all times. Questions or concerns must be escalated to the export compliance team prior to travel or system access. High-risk jurisdictions for purposes of system access restrictions currently include: Afghanistan, Belarus, Cuba, Guinea, Iran, North Korea, Nigeria, Russia, Somalia, Sudan, South Sudan, Syria, Ukraine, and Venezuela.

Recordkeeping

C.H. Robinson is committed to maintaining complete, accurate, and reliable records to support compliance with U.S. economic sanctions requirements (31 CFR § 501.601). Records relating to sanctions-screened transactions; customer and counterparty information; licenses or authorizations; screening results; blocked, rejected or declined transactions; and related communications must be retained for no less than ten (10) years from the date of the transaction or activity. Records associated with blocked or restricted property must be maintained for the duration of the restriction and for at least ten (10) years after the restriction is lifted. All records must be maintained in a manner that ensures timely retrieval and availability for internal review or examination by government authorities. Failure to comply with recordkeeping obligations may expose C.H. Robinson and its employees to legal, regulatory, and reputational risk.

Training

C.H. Robinson requires annual, mandatory sanctions compliance training for all global employees. This training is designed to ensure employees understand U.S. economic sanctions requirements; recognize potential sanctions risks; and know how to identify, escalate, and address sanctions-related issues in the course of their work. The training reinforces individual responsibility, promotes consistent compliance practices across the organization, and supports the Company's commitment to conducting business ethically and in full compliance with applicable sanctions laws. Training content is risk-based, role-appropriate, and may be supplemented as needed based on operational trends, escalations, or compliance findings.

If there are any questions regarding C.H. Robinson business with sanctioned or embargoed countries or our corporate screening process, or to view the Global Forwarding Sanction and Embargo Country Guide, contact the export compliance team.

Procurement Policy

Purchasing based on merit

C.H. Robinson purchases and leases billions of dollars' worth of goods and services from carriers, growers, and third-party suppliers of indirect goods and services. The integrity of our business depends, in part, on proper procurement. Responsible procurement practices have a positive effect on shareholders, customers, regulators, and team members. The C.H. Robinson policy is to make purchasing decisions based on merit, regardless of the supplier of the product or services.

C.H. Robinson prides itself on having an open-door policy with respect to potential suppliers. We will give fair and impartial consideration to every supplier and potential supplier.

Personal conflicts of interest

No business with suppliers or other third parties should be affected by a personal conflict of interest, by favoritism, or by bias of any sort. The practice of reciprocity, purchasing goods or services from another business on condition that it purchases goods or services from C.H. Robinson, is strictly prohibited.

If a supplier suggests any form of reciprocity, you should immediately make it clear to the supplier that C.H. Robinson does not and will not deal on such terms.

Group boycotts

Participating in group boycotts, which is an arrangement between C.H. Robinson and other purchasers that they will not buy from a supplier or suppliers, is prohibited. If you are approached by anyone proposing a group refusal to do business with a supplier, you should immediately reject the proposal and report the incident to the Legal Department.

Restrictive Agreements and Exclusive Dealing Agreements are against C.H. Robinson policy. We discourage any supplier contract provision that restricts the C.H. Robinson freedom of choice in the selection of a product or service or in choosing to do business with another supplier.

All contract provisions (including those arrangements that involve Exclusive Dealing or other Restrictive Agreements with suppliers and customers) should be reviewed by the Legal Department before an agreement is reached.

Personal integrity and professionalism

All individuals involved with purchasing or other procurement related activities must act, and be seen to act, with integrity and professionalism. Honesty, care, and due diligence must be integral to all procurement activities within and between C.H. Robinson, its suppliers, and other stakeholders. Purchases from third-party suppliers should follow the C.H. Robinson Procurement Policy.

Confidential information must be safeguarded. All participants must not engage in any activity that may create, or appear to create, a conflict of interest, such as accepting gifts or favors, providing preferential treatment, or publicly endorsing suppliers or products (See the conflicts of interest section of this policy).

Accountability and transparency

Procurement activities must be open and accountable. Contracting and purchasing activities must be fair, transparent, and conducted with a view to obtaining the best value for C.H. Robinson. Purchases should be competitively bid in accordance with the Procurement Policy. All contracts must be signed in compliance with the North American Contract Approval and Signature Policy, where applicable.

Supplier gifts and entertainment

C.H. Robinson team members shall not accept third-party supplier gifts (i.e., promotional items) and entertainment (including meals and beverages) over \$250 USD annually. Cash or gift cards should never be accepted for any dollar amount. Any exception to this requires senior leadership approval.

Anti-Boycott Policy

Compliance with all United States laws

At C.H. Robinson we are committed to full compliance with U.S. laws and regulations governing anti-boycott practices. We strictly prohibit participation in or support of any boycott not sanctioned by the U.S. Government, including providing information, taking actions, or making agreements that might assist such boycotts. This policy applies to all employees, divisions, controlled-in-fact subsidiaries, and controlled joint ventures C.H. Robinson, both in the United States and abroad.

Policy impacted by multiple acts, agencies, and departments

The laws referred to in this Policy include the Tax Reform Act of 1976, the Export Administration Act of 1979, as amended, and the Internal Revenue Service and Commerce Department regulations that implement these Acts (the "anti-boycott laws").

U.S. anti-boycott laws primarily target boycotts against Israel, such as those imposed by the Arab League. These laws prohibit refusing to do business with Israel, discriminating against individuals or entities based on their affiliation with Israel, or providing information that supports such boycotts.

Employees must report any requests to participate in or support a prohibited boycott to the export compliance team immediately. No further action should be taken without their authorization.

Violations of anti-boycott laws can result in severe penalties, including civil and criminal fines, denial of export privileges, and even imprisonment.

Examples of prohibited activities

The anti-boycott laws prohibit C.H. Robinson, including its divisions, controlled-in-fact subsidiaries, and controlled joint ventures anywhere in the world from engaging in the following acts:

- Agreeing to refuse business with Israel or entities associated with Israel
- Providing information about a person's or entity's business relationships with Israel
- Making discriminatory statements or agreements based on race, religion, nationality, or origin

Permissible activities (with compliance review)

C.H. Robinson may engage in the following actions without violating the anti-boycott laws:

- Complying with a boycotting country's specific import and export documentation requirements, provided they do not violate U.S. laws.
- Comply with the unilateral and specific selection by a boycotting country of carriers, insurers, and suppliers of goods or services.
- Following explicit shipping or supplier preferences outlined by a boycotting country, as long as they do not involve prohibited boycott activities.
- Comply with a request from a boycotting country that goods not be shipped on a carrier of Israel other than pursuant to a specific route of shipment.
- Comply with the boycotting country's export requirements with respect to shipments of exports from the boycotting country to Israel, a business concern organized in Israel, or any national or resident of Israel.
- Comply with the import and shipping document requirements of the boycotting country with respect to naming the country of origin of goods; the name and nationality of the carrier; the route of shipment; and the name, nationality, and address of the supplier.

Boycott reporting requirements

C.H. Robinson, its subsidiaries, affiliates, agents, and representatives must promptly report the receipt of any request to supply any information, take any action, or refrain from taking any action that could be considered in furtherance or support of a prohibited boycott (a "boycott request") to the U.S. Department of Commerce.

Because C.H. Robinson is required to report this information to the authorities in a prescribed form and within a specified time, you must immediately report any boycott request to the export compliance team. The export compliance team screens potential requests and does so on a regular basis. No further action may then be taken in response to the boycott request without specific authorization from the export compliance team.

Permitted: In shipping goods to a particular boycotting country, you select carriers only from among carriers you know call at ports in the boycotting country.

Permitted: Agreeing as a condition of a contract with a boycotting country that services rendered pursuant to the contract will not be provided by residents or nationals of Israel.

Permitted: Replacing persons to whom an Arab League Government refuses to give a work permit on the basis of such person's race, ethnicity, or nationality.

Permitted: Furnishing normal business information in a commercial context. For example, as part of a tender for a contract in a boycotting country, you may furnish copies of the C.H. Robinson annual report, which describes its business and locations of worldwide operations for the purpose of demonstrating C.H. Robinson financial fitness, technical competence, and professional experience.

Permitted: You agree to use a specifically named carrier, insurer, or supplier of goods named by the boycotting country.

Permitted: In opening a new subsidiary or office, a boycotting country requires information on the nationalities of the members of the Board of Directors of the shareholder; you can provide information on the nationalities of such persons, but not information about their race, religion, or national origin.

Penalties for violations of anti-boycott laws

Violations of the anti-boycott laws are subject to severe penalties. These penalties may include denial or suspension of export privileges, civil and criminal penalties, and even imprisonment for individuals.

Employees are encouraged to reach out to the export compliance team for clarification on anti-boycott regulations and guidance on handling potential boycott requests. Compliance is critical to safeguarding our business and reputation.

Prohibited and permissible acts under anti-boycott laws

The anti-boycott laws contain numerous specific examples of prohibited and permissible acts in relation to a prohibited boycott. Listed below are merely a few examples of prohibited and permissible acts under the anti-boycott laws.

In all cases, it is prohibited to take any action that has as its purpose, the evasion of the prohibitions set out in the anti-boycott laws. For example, you cannot sell goods to Saudi Arabia through a shell corporation that signs statements saying it will not deal with Israel.

The above examples are illustrative only and by no means intended to be complete. To the extent you have any further questions, contact the export compliance team.

Prohibited: Refusing to use a specific carrier or insurance company in respect of a shipment of goods because you know the carrier or insurance company is on the Arab League blacklist for doing business with Israel.

Prohibited: Stating the origin of goods in negative terms, such as a statement that "the goods covered by this invoice are not of Israeli origin."

Prohibited: Discriminating against any U.S. person based on race, religion, or national origin. For example, you may not discourage Israeli nationals from applying for jobs in Arab countries, even if you know they would not be able to get a work permit.

Prohibited: Furnishing any information about whether C.H. Robinson or any other person has any business relationship with or in a boycotted country. For example, you may not sign a statement stating C.H. Robinson has no dealings with Israel or is not on the Arab blacklist.

Prohibited: You choose from among a list of carriers, insurers, or suppliers of goods provided by and acceptable to the boycotting country.

Prohibited: Responding to a questionnaire from a boycotting country seeking information about the race, religion, or national origin of the members of the board of directors of any C.H. Robinson Company.

Questions or concerns relating to this section

Resources

[Human Resources](#)

[Legal Department](#)

[Anonymous Reporting Process](#)

[Privacy Department](#)

[Export Compliance Team](#)

[Procurement](#)

Additional policies associated with this section

[Insider Trading Policy](#)

[Procurement Policy](#)

[North American Contract Approval and Signature Policy](#)

Operating Responsibly

Our Robinson Operating Model strengthens our ability to uphold the commitments outlined in this section by creating clearer accountability, consistent processes, and stronger cross-functional collaboration across our global network. With shared standards and streamlined decision making, we embed our expectations and best practices into operations. This model improves visibility to risks, supports better execution, and equips our teams to operate responsibly everywhere we do business.

Human Rights

C.H. Robinson manages business with the belief that all people, regardless of their nationality, religion, place of origin, sex, language, or any other status, should be treated with integrity and respect. It is a fundamental value within our cultural integrity, and one we expect you and business partners to maintain.

Protecting others

We are committed to protecting the human rights of our team and business partners globally and the communities where we operate. For C.H. Robinson, this is reflected in issues such as equal opportunity and fair treatment, compliance with national and local regulations on wages and work hours, a safe working environment and privacy and proper handling of Personally Identifiable Information (PII).

Human rights in communities

We hope to positively impact human rights within the communities in which we operate. We do not tolerate exploitation, human trafficking, forced labor, slavery, or human rights abuses of any kind. We expect customers and suppliers to uphold their strong principles and encourage them to adopt similar practices within their own businesses. As part of our broad effort, respecting human rights and dignity is integrated and valued in all we do.

Alignment with our purpose, promise, and behaviors

We earn the trust of our team and stakeholders by acting upon The Robinson Way; our policies reflect this culture. Our policies exhibit our commitment to respecting human rights and employment practices, such as our Global Data Privacy Policy, Anti-Bribery and Anti-Corruption Policy, Anti-Money Laundering Policy, and our Non-Discrimination and Anti-Harassment Policy.

Anti-Human Trafficking Policy

C.H. Robinson does not permit child, prison, forced, or trafficked labor in our operations. C.H. Robinson employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others through whom C.H. Robinson conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery, which includes but is not limited to, the illegal movement of people, trafficking in persons, sexual exploitation, and the use of forced or child labor of any form. C.H. Robinson, its employees, contractors, subcontractors (includes suppliers and agents), contingent workers, and others performing work on behalf of C.H. Robinson are prohibited from:

- Engaging in any form of trafficking in persons.
- Procuring illegal commercial sex acts.
- Using forced labor in the performance of the contract.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents.
- Using misleading or fraudulent recruitment practices, such as failing to disclose basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, and, if applicable, the hazardous nature of the work.
- Charging employees or candidates recruitment fees.
- Employing individuals below the minimum legal age for employment. All national legislation and international agreements that specify a minimum age for employees must be complied with.

Consistent with integrity at C.H. Robinson, team members are expected to treat all people with fairness, dignity, and respect.

C.H. Robinson is committed to acting against human trafficking, child labor, and forced labor in our operations. If such activity occurs, the C.H. Robinson response may include terminating employment contracts and other such measures that will ensure no further inappropriate activity occurs. Any team member that believes they have been a victim of human trafficking, child labor, or forced labor, or has knowledge of such offenses, or is aware of possible violations should utilize the C.H. Robinson policy to report such incidents to Human Resources, the Legal Department, or through the anonymous reporting process.

Sustainability Policy

As one of the world's most-connected logistics providers, we have long been recognized as an innovative thought leader that is uniquely positioned to solve some of the most complex issues facing our industry today. We put our customers at the center of everything we do, and for decades we've helped companies improve how they transport their goods—demonstrating our commitment to reducing waste, optimizing the use of resources, and promoting efficiency. We work to improve the world's supply chains, which is not only critical to creating a more sustainable future, but important to creating long-term value for our organization and all our stakeholders.

Our policy applies to C.H. Robinson entities within operational control. As a Company, we are committed to:

- Resource efficiency: We aim to optimize the use of financial and natural resources throughout our operations, which may include lighting, water, or energy. We will promote the use of cost-effective technologies to manage resources and promote awareness of responsible practices to mitigate environmental impact of our facilities.

- Stakeholder engagement: To develop and evolve appropriate environmental standards, we engage with our employees, customers, communities, and other stakeholders to identify the most critical priorities, and foster a culture of environmental stewardship. By encouraging participation and collaboration, we leverage collective efforts to drive positive environmental outcomes.
- Compliance: We are committed to complying with all applicable environmental laws, regulations, and standards. We work to proactively identify and address potential risks and opportunities.
- Resource Efficiency: We aim to optimize the use of financial and natural resources throughout our operations, which may include lighting, water or energy. We will promote the use of cost-effective technologies to manage resources and promote awareness of responsible practices to mitigate environmental impact of our facilities.
- Continuous Improvement: We are committed to continuously improving our environmental performance through regular monitoring, measurement, and evaluation.

This policy is communicated to all employees of C.H. Robinson and its interested stakeholders herein and additionally by the vice president of ESG. Any additional sustainability commitments or environmental policies will align with this global policy, including the Warehouse Environmental, Health & Safety Policy. Any questions related to the above can be directed to the Sustainability Department.

Warehouse Environmental, Health, and Safety (EHS) Policy

C.H. Robinson is committed to providing and maintaining an environmentally friendly, healthy, safe, and secure workplace for all employees, contractors, customers, and visitors.

We shall uphold the Environmental, Health, and Safety Policy (EHS) of our warehouses consistently by incorporating The Robinson Way into our training and educational initiatives related to EHS.

Essential instruments for success are our EHS programs and educating our people. To ensure adoption of our EHS policy, it will be accessible to everyone through standardized training and a commitment to continuous improvement practices.

We will accomplish and sustain our EHS policy by various mechanisms and continuous improvement methodologies which include:

- Network and site-specific EHS communication
- Process education and training/process improvement events
- New employment orientation and monthly safety training activities

- Defined and implemented Warehouse Excellence Program at all locations
- Process risk assessments / Injury or Illness prevention investigations with root cause analysis
- Active Safety Committee involvement that drives peer to peer engagement and positive culture
- Leadership commitment and disciplines through engagement, departmental collaboration, and resource support

Commitment to report

At C.H. Robinson, we are dedicated to maintaining a safe and healthy work environment for everyone. By adhering to this policy, we ensure the wellbeing of our employees and contribute to the overall success of our organization.

C.H. Robinson requires each team member to help maintain safe and healthy practices. If you see any form of violations, report it to your leader, the office/department leader, Human Resources, the Legal Department, or through the anonymous reporting process. Any team member aware of possible violations of these policies is required to report the situation so it can be investigated and appropriately addressed.

Leaders have additional responsibilities when it comes to health and safety of our people. Not only must leaders conduct themselves in a manner consistent with the Code of Ethics and applicable policies, but they are also responsible for establishing and maintaining an atmosphere that protects the wellbeing of our employees, where all applicants and employees enjoy a safe and healthy work environment. Leaders must be alert for incidents and take prompt, corrective action in accordance with the C.H. Robinson policy.

Questions or concerns relating to this section

Resources

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[Anonymous Reporting process](#)

[Sustainability Department](#)



Compliance with the Code of Ethics

Reporting and investigating violations of the Code of Ethics

Determining if a violation occurred

Determining whether a violation occurred is perhaps the most important step in the process of enforcing the Code of Ethics. Given the variety of possible violations, and the range of circumstances in which they can occur, C.H. Robinson cannot employ a uniform procedure for the investigation and determination of violations.

In some cases, informal meetings between leaders and team members may be sufficient to address minor violations, while serious violations may merit a full and formal investigation.

There are, however, certain principles that will be constant from case to case. In all cases:

- Team members will be given advance notice and an opportunity to explain their actions and the leaders directing the investigation will carefully document all actions taken and decisions reached.
- Upon request, those involved may request the final disposition of an investigation.

Timing of investigation

We will take all reasonable steps to investigate reported violations promptly and thoroughly. All team members are expected to cooperate fully with internal investigations, which may include speaking with leaders and/or members of the Legal Department or Human Resources Department.

Outcomes of an investigation

Any employees determined to have engaged in a violation of the Codes of Ethics will be subject to appropriate corrective action, up to and including termination of employment or termination of a contract. The C.H. Robinson policy is to enforce the Code of Ethics in a reasonable and consistent fashion; however, the form of action that is appropriate will be case specific.

There are certain offenses and violations that are so serious that immediate dismissal of employment or termination of contract is appropriate. For guidance as to these particular offenses and violations, contact Human Resources of the Legal Department.

Protecting confidentiality

We take reasonable precautions to maintain the confidentiality of those who report violations of the law or the Code of Ethics and will take all necessary measures to keep the investigation as confidential as possible and share information only on a need-to-know basis. This confidentiality includes both the confidentiality of the person making the report as well as the person about whom the report is made. There may be instances, however, where we cannot assure this confidentiality for reasons beyond our control.

To uphold the integrity of the investigation, team members involved or who have made reports are asked to maintain confidentiality of the information involved in the investigation.

Non-retaliation

Team members who report violations of the law or of the Code of Ethics in good faith will not be subject to retaliation. This includes anything affecting the team member's working conditions or status, including, but not limited to compensation, schedules, and workstations. Failing to report or condoning a violation of the law or Code of Ethics may lead to corrective action up to and including termination unless such reporting is prohibited by law in the country where the team member is located.

Additional responsibilities for leaders

Leaders play a unique role in creating an open and trusting environment where team members are comfortable asking questions or talking about ethical issues. You are also responsible for preventing intimidation or retaliation against those who report suspected violations or cooperate with any investigations.

Start by setting a good example in all actions and decisions. Display your personal commitment to the ethical and legal principles in this Code of Ethics by demonstrating what it means to act with integrity and making sure all team members understand and comply with all laws and the Code of Ethics.

Team members are required to promptly report any known or suspected violations of the laws or the Code of Ethics.



Annual review

The Code of Ethics is reviewed annually to ensure its policies reflect the Company's values and applicable federal, state, and local regulatory updates.

In order to maintain an effective compliance program, C.H. Robinson has set up a Compliance Committee whose responsibility is to provide oversight of administration and enforcement of the Company's Code of Ethics.

The Compliance Committee is made up of the Chief Financial Officer, Chief Human Resources Officer, Chief Legal Officer, and one or more Vice Presidents of Operations.

Procedures for ensuring effectiveness

To ensure the effectiveness of its Code of Ethics, C.H. Robinson has procedures for:

- Verification that reprisals are not being taken against employees who report violations.
- Verification of the prompt distribution of the Code of Ethics to new and existing employees.
- Verification of the certification process by which employees affirm they have read and understand the Code of Ethics.
- Verification of training on the Code of Ethics for new team members, and periodic training on key Code of Ethics sections, as warranted.
- Verification of the internal investigation and corrective action process, including the confidentiality and thoroughness of the investigations and documentation.
- Verification of the use of the anonymous reporting system to report violations, including review of the number of reported violations as well as other information received through the system.

Team member Code of Ethics review

Upon hire/contract and annually thereafter, all team members will be required to review the Code of Ethics. All team members must certify they have received the document, read and understood its contents, and agreed to comply with both its letter and spirit.

In addition, each team member will be required annually to certify they have not committed any violations and are not aware of any violations by others. Leaders are responsible for ensuring their team members comply with the Code of Ethics.

Auditing Code of Ethics effectiveness

From time to time, C.H. Robinson will find it necessary to have auditors and investigators involved in the process of reviewing and auditing the effectiveness of our Code of Ethics. It is necessary you fully cooperate with their investigations.

Conclusion

Our Code of Ethics serves as a guide for how we conduct ourselves, make decisions, and uphold our responsibilities to one another, customers, carriers, and communities. By adhering to these principles, we reinforce a culture of integrity, accountability, and respect. Each of us is responsible for understanding and living these values every day, ensuring they remain central to our actions and our organization's success.



C.H. ROBINSON