

# C.H. Robinson Code of Ethics & FCPA Policy

Thank you for your interest in our ethics and compliance policies.

C.H. Robinson Worldwide, Inc. ("CHRW") maintains a comprehensive and robust internal program to eliminate the risk of transacting business that in any manner violates any worldwide anti-corruption/anti-bribery statute or program, to include the United States Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act 2010, the U.K. Antiterrorism, Crime and Security Act 2001, legislation implementing the OECD Convention on Combatting Bribery of Foreign Public Officials, and any country's equivalent statute in any country where CHRW transacts business. Additionally, CHRW prohibits any business partner, supplier, vendor, contractor, carrier, and broker to name a few, from offering, promising, or paying anything of value to a foreign government official to obtain or retain business, or gain an unfair advantage in any manner, for any business involving CHRW or its customers.

- CHRW has drafted and maintains a Code of Ethics. This document maintains and explains those policies and procedures that all CHRW employees must know, understand, and follow without exception (e.g. Conflict of Interest, Compliance with Laws, Fair Competition Policy etc.). All new CHRW employees must take computer-based Code of Ethics training upon hire and every year thereafter. Additionally, every year all employees around the globe must read the Code of Ethics and certify in writing (signature required) that they understand the Code of Ethics and its contents.
- It is important to note, the Code of Ethics is written in over eight (8) languages and is available externally at: [www.chrobinson.com](http://www.chrobinson.com).
- The Code of Ethics also contains, explains, and discusses CHRW's corporate anti-corruption/anti-bribery policy. The Code of Ethics and the anti-corruption/anti-bribery policy identify and explain what practices are acceptable and permissible. If any question or doubt exists regarding the anti-corruption/anti-bribery policy, an employee must contact the CHRW Legal Department. CHRW requires all employees to undergo computer-based anti-corruption/anti-bribery training upon hire and every year thereafter. The anti-corruption/anti-bribery computer-based training requires every employee to take and pass a test. As part of the CHRW training, CHRW has also identified certain countries where CHRW (Legal Department) has provided live and/or onsite and in person anti-corruption/anti-bribery training (e.g., Argentina, China, India, Sri Lanka, Brazil, Mexico and Indonesia).
- Before CHRW engages any worldwide global forwarding agent to perform services for it, CHRW will request a formal due diligence report on said agent from a 3<sup>rd</sup> party diligence company. CHRW also requires worldwide global forwarding agents with whom it does business to be under contract. There is certain explicit language in these contracts citing the above statutes and the worldwide anti-corruption/anti-bribery programs (e.g., FCPA, UK Bribery Act). Contracted agents must certify to CHRW as part of the agreement that they comply with these statutes and programs. Of equal importance, all contracted agents are required to undergo the same computer-based anti-corruption/anti-bribery training that CHRW employees must take.

CHRW is proud of our robust and comprehensive compliance programs, as we place a premium and priority on them. Our programs were drafted specifically for our business and industry and based on the global locations where we perform services. For these reasons, CHRW does not certify compliance with other codes or policies.

Thank you,  
CHRW Legal Department

[www.chrobinson.com](http://www.chrobinson.com)

© 2017 C.H. Robinson Worldwide Inc. All Rights Reserved.



**C.H. ROBINSON**  
ACCELERATE YOUR ADVANTAGE™