

Maersk Services USA Inc. is committed to ensuring accessibility of this policy to all applicants, employees and other covered individuals as stated in this policy. If you need assistance accessing or understanding this policy statement, or know of an applicant or employee who may need assistance, please call our HR department at 844-616-4396.

January 2017

TO: All Employees and Applicants of Maersk Services USA Inc.

FROM: James P. Philbin, Chief Executive Officer and General Counsel, Maersk Services USA Inc.

SUBJECT: Equal Employment Opportunity and Affirmative Action Policies

EEO Statement

Maersk Services USA Inc. believes all persons are entitled to equal employment opportunities. In furtherance of our policy of equal employment opportunity, Maersk is committed to maintaining a work environment free of any form of discrimination or harassment against applicants for employment, employees, vendors, contractors, or customers on the basis of race, color, religion and religious creed, age, sex, gender, sexual orientation, gender identity, gender expression, national origin, ancestry, physical and mental disability, medical condition, genetic information, pregnancy, military and veteran status, citizenship status, marital status, or any other basis protected by law (the "Protected Classification(s)").

As a federal contractor subject to Executive Order 11246 (E.O. 11246), Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA), and Section 503 of the Rehabilitation Act of 1973, as amended (Section 503), Maersk has implemented the following policies and procedures as part of our commitment to compliance with equal employment opportunity and affirmative action requirements. These policies apply whenever and wherever a Maersk employee is performing a function of his or her job, including at all Maersk locations, client worksites, and company-sponsored or client-sponsored business and social functions.

It is Maersk's policy to take affirmative action to employ and advance in employment qualified minorities, women, protected veterans, and individuals with disabilities. We will provide reasonable accommodations to the known physical or mental limitations of an otherwise qualified applicant for employment or employee, unless the accommodation would impose an undue hardship on the operation of our business.

Maersk's equal employment opportunity and affirmative action policies require that employment decisions be based only on valid job requirements, and extend to all terms, conditions, and privileges of employment at all levels including, but not limited to, recruitment, selection, compensation, benefits, training, promotion, and disciplinary actions.

Maersk is also committed to ensuring a professional and safe working environment for all people. Workplace harassment of any kind, based on, or because of, any Protected Classification, or any other reason prohibited by law will not be tolerated, whether committed by Maersk personnel or by clients,

customers, vendors, or other individuals doing business with Maersk. Prohibited harassment occurs when a supervisor, co-worker, or even a non-employee behaves or acts in such a way that creates a hostile work environment for another employee based on an individual's Protected Classification or other protected characteristic.

Maersk encourages anyone who becomes aware of discrimination or harassment to report it immediately to the HR department, a manager or supervisor. We will promptly and thoroughly investigate the alleged misconduct and, if a violation of this policy is found, will take immediate and appropriate corrective action.

We will also take all necessary steps to ensure that no applicant for employment, employee or other covered individual is subjected to harassment, intimidation, threats, coercion or discrimination because he or she has engaged in or may engage in the filing of a complaint; assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of E.O. 11246, VEVRAA, Section 503, or any other federal, state, or local law requiring equal employment opportunity for individuals with disabilities or protected veterans; opposing any act or practice made unlawful by E.O. 11246, VEVRAA or Section 503 and their implementing regulations, or any other federal, state, or local law requiring equal employment opportunity for individuals with disabilities or protected veterans; or exercising any other right protected by E.O. 11246, VEVRAA or Section 503 or their implementing regulations.

Maersk's equal employment opportunity and affirmative action policies also prohibit any and all forms of retaliation against anyone who in good faith complains that these policies are not being followed, or who otherwise participates in a company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been subjected to retaliation, your complaint should be directed to one of the individuals identified below. After receiving a complaint involving a violation of the company's equal employment opportunity or affirmative action policy, the company will investigate and take corrective action, as appropriate. Complaints and investigations will be kept strictly confidential to the maximum extent possible. No one, regardless of position or length of service, is exempt from these policies.

As the Chief Executive Officer and General Counsel of Maersk Services USA Inc., I fully support our affirmative action program and am committed to implementation of Maersk's equal employment opportunity and affirmative action policies. I have designated overall responsibility for these policies to the HR department, which is responsible for the implementation and auditing of these policies for Maersk at each of our individual facilities. Complaints should be directed to your HR department.

Maersk recognizes that commitment to equal employment opportunity goes beyond formal programs; it requires the individual commitment of all Maersk people. Please join me in ensuring that every Maersk person is treated with dignity and respect for individual differences and that Maersk is a company where all people can truly excel.

The non-confidential portions of our affirmative action programs are available for inspection by any applicant for employment or employee in the Company's HR office during regular business hours. Please contact the HR department for additional information.



James P. Philbin III

Chief Executive Officer and General Counsel, Maersk Services USA Inc.