



**Equal Employment Opportunity Statement, from William E. Woodhour, President and CEO of Maersk Line, Limited. ("MLL")**

***MLL 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 757-531-7860.***

*MLL believes all persons are entitled to equal employment opportunities. In furtherance of our policy of equal employment opportunity, MLL 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), MLL has implemented the following policies and procedures as part of our commitment to compliance with equal opportunity and affirmative action requirements.*

*These policies apply whenever and wherever a MLL employee is performing a function of his or her job, including at all MLL locations, client worksites, and company-sponsored or client-sponsored business and social functions.*

*It is MLL'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.*

*MLL'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.*

*MLL 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 MLL personnel or by clients, customers, vendors, or other individuals doing business with MLL. 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.*

*MLL 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.*

*MLL's equal 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 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 President of MLL, I fully support our affirmative action program and am committed to implementation of MLL'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 MLL at each of our individual facilities. Complaints should be directed to your local HR business partner.*

*MLL recognizes that commitment to equal employment opportunity goes beyond formal programs; it requires the individual commitment of all MLL people. Please join me in ensuring that every MLL person is treated with dignity and respect for individual differences and that MLL 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 your local HR office during regular business hours. Please contact your local HR business partner for additional information.*

### **Discrimination and Harassment**

Unlawful discrimination and harassment, including sexual harassment, discriminatory harassment, and other workplace conduct prohibited by law will not be tolerated by the Company. This prohibition applies to all unlawful discrimination and harassment occurring in the work environment, including at all

Company locations, client worksites, and Company-sponsored or client-sponsored business and social functions, or in the use of Company resources, including electronic mail, voicemail and the Internet.

Unlawful discrimination and harassment by non-employees or other third parties (e.g., customers, clients, independent contractors, vendors, applicants, paid and/or unpaid interns, volunteers, and/or other third parties over whom the Company has control (regardless of their status)) is also prohibited. If a colleague informs the Company that he or she has been subject to or has witnessed discrimination or other harassment in the workplace by a non-employee, that individual will be informed of the Company's policy and appropriate investigation, corrective action and preventive steps will be taken, as set forth below.

### **Sexual Harassment**

For purposes of this Guide and this Sexual Harassment Policy, "sexual harassment" is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

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

Sexual harassment is prohibited, whether directed toward men or women, and regardless of whether the employee accepts or rejects the advance. Sexual harassment can happen between same-sex individuals as well as between opposite-sex individuals, and does not require that the harassing conduct be motivated by sexual desire. Colleagues should be aware that, in addition to being contrary to Company policy, sexual harassment can violate the law and result in personal liability for the harasser.

Abusive conduct and/or bullying on any protected basis is also prohibited. Examples of what may constitute sexual harassment include: threatening or taking adverse employment actions if sexual favors are not granted; demands for sexual favors in exchange for favorable or preferential treatment; unwelcome or repeated flirtations; propositions or advances; unwelcome physical contact; whistling, leering, improper gestures or offensive remarks, including unwelcome comments about appearance; sexual jokes or inappropriate use of sexually explicit or offensive language; and the display in the workplace of sexually suggestive objects or pictures. The above list is not intended to be all-inclusive.

### **Other Forms of Discriminatory Harassment**

"Other discriminatory harassment" includes verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her Protected Classification or any other basis protected by law, and that:

- has the purpose or effect of creating an intimidating, hostile or offensive work environment; or
- has the purpose or effect of unreasonably interfering with an individual's work performance.

Examples of what may constitute such harassment include: using epithets or slurs; threatening, intimidating or engaging in hostile acts that focus on a protected characteristic, including jokes or

pranks; and placing or circulating anywhere on the Company's premises, or using Company resources (including electronic mail, voice mail or the Internet) to create, send, receive or store, written or graphic material that denigrates or shows hostility, bias against or aversion toward a person or group because of a protected characteristic. The above list is not intended to be all-inclusive.

*What should I do if I believe I have experienced unlawful discrimination or harassment or retaliation?*

If you believe that you have been subject to unlawful workplace discrimination or harassment of any kind, or have observed discrimination or harassment or retaliation of another colleague, you should report the matter, whether verbally or in writing, as soon as possible. Such complaints should be brought to the attention of any supervisor or department manager or the HR department. You are not required to report the matter to your direct supervisor, particularly if that individual is the source of the concern. While the Company will address all such concerns, whether raised orally or in writing, the Company requests that, if possible, the specific concerns be addressed in writing to allow the Company to properly address any issues. Key contact information regarding making a report is provided at the end of this Guide for your reference.

The Company understands that reporting discrimination, harassment or retaliation can be extremely sensitive and the Company will maintain confidentiality with respect to such reports and communications and throughout the investigative process to the extent possible, but cannot maintain complete confidentiality, consistent with the Company's need to comply with applicable law and to undertake a prompt, full and thorough investigation.

When a colleague or other covered individual reports harassment or other misconduct under this policy, the Company will use qualified personnel to conduct a fair, impartial, prompt, timely and thorough investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The steps of an appropriate investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations. The Company will utilize appropriate documentation and tracking to ensure reasonable progress and timely closure of the investigation.

If the Company determines that unlawful discrimination or harassment, or retaliation, has occurred, appropriate remedial and corrective action and/or disciplinary action will be taken if misconduct is found and as warranted by the circumstances. Remedial actions may include, but are not necessarily limited to, oral or written counseling, referral to formal counseling, disciplinary suspension or probation, and/or discharge from the Company.

*What should I do to comply with the Company's prohibition against unlawful discrimination and harassment?*

The Company expects its colleagues to immediately report any suspected or actual violations. In addition, **all supervisors** and management must immediately report to the HR department any reports they receive concerning discrimination or harassment or retaliation of any kind.

## **Non-Retaliation**

The Company respects the right of each colleague to report in good faith possible unlawful discrimination or harassment, including sexual or other discriminatory harassment, or to provide information and/or participate in any investigation in connection with any such report. *Retaliation against any colleague for engaging in these protected activities is contrary to Company policy and will not be tolerated.*

Any retaliation is a serious violation of this policy and colleagues should report it immediately. The report and investigation of allegations of retaliation will follow the procedures set forth in this policy. Any individual found to have retaliated against an individual for reporting discriminatory harassment or participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action.

## **Communication**

This policy is part of the Company's overall commitment to open communication. The Company encourages any colleague with workplace concerns of any nature (including, but not limited to, any alleged discrimination, harassment or retaliation) to bring those concerns to the attention of the HR Department.

If 10 percent or more of the workforce at any Company facility or establishment uses a spoken language other than English, then the Company will make translated versions of this policy available in every language that is spoken by at least 10 percent of the workforce. Please direct any translation requests to the HR Department.



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