



Hub Group, Inc. SUPPLIER CODE OF CONDUCT

Revised as of March 2022

Hub Group, Inc. ("Hub") believes in conducting its operations honestly and ethically and expects the same from its suppliers. Suppliers and their employees, agents, and subcontractors (collectively referred to as "Suppliers") are required to comply with applicable legal and regulatory requirements in all of their activities associated with Hub business. Suppliers are further required to adhere to the standards of conduct set out in this Code of Conduct, as well as to comply with their contractual obligations to Hub. In the event a Supplier learns that they are not in compliance with this policy or with their applicable legal, regulatory, or contractual obligations, Suppliers must promptly inform their Hub relationship contact or Hub's legal team (by emailing legal@hubgroup.com).

Responsibilities of Hub Suppliers

Compliance With Laws: Comply with all applicable federal, state and local laws, rules and regulations of the U.S. and other countries in which the Supplier conducts its business or which are applicable to the Supplier's relationship with Hub, including contractual or other obligations the Supplier has to Hub (that may exceed legal requirements).

Conflicts Of Interest: Avoid improprieties and conflicts of interest (and the appearance of conflicts of interest) with Hub employees, officers and directors or their immediate family members (each, a "Hub Representative"). A "conflict of interest" exists whenever a Hub Representative's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of Hub. Conflicts of interest may also arise when a Hub Representative receives improper personal benefits from a Supplier as a result of the Hub Representative's relationship to Hub. It is almost always a conflict of interest for a Hub Representative to work simultaneously for, or have a financial interest in, or receive any direct or indirect financial benefit from, a Supplier.

Anti-Bribery; Anti-Corruption: Avoid offering or providing, whether directly or indirectly, anything of value (e.g., cash, gifts, entertainment, kickbacks, offers of employment) to any government official or employee (at any level), current or prospective Hub customer, or other Hub supplier in connection with any Hub procurement or other transaction. Hub requires strict compliance with the U.S. Foreign Corrupt Practices Act, and anti-corruption laws of other countries, which prohibit directly or indirectly offering anything of value to influence or induce action, or to secure an improper advantage. These prohibitions apply not only to commercial transactions, but to other facilitating or administrative activities (e.g., customs brokers, maritime officials, permit or licensing authorities, etc.).

Gifts and Entertainment: Business entertainment and gifts in a commercial setting intended solely to create good will and sound working relationships, and not to gain unfair advantage with Hub Representatives, may only be offered or given by a Supplier if the entertainment or gift: (1) is not a cash or cash equivalent (e.g., gift cards) gift, (2) is consistent with customary business practices in that location, (3) is not excessive in value, (4) cannot be construed as a bribe, kickback or payoff, (5) does not violate the Supplier's own policies, and (6) does not violate any laws or regulations.

Human Rights and Fair Employment Practices: Comply fully with applicable employment laws, respect human rights, and provide equal opportunities. Maintain a positive work environment and follow applicable law prohibiting discrimination or harassment based on age, race, color, religion, national origin or ancestry, gender, gender identity or expression, sexual orientation, disability, and military or veteran status, genetic information, citizenship status, marital status, or other protected classes. Suppliers shall not utilize child labor, forced labor or prison labor under any circumstances and shall follow all minimum working age and other applicable legal requirements with respect to employees in the jurisdictions in which Supplier operates. Comply with applicable legal requirements



governing wages, hours, recruitment, and similar workplace matters. Harassment of any kind against Hub employees is strictly prohibited.

Occupational Health and Safety: Provide a safe and healthy work environment for all employees. Promote employee involvement in identifying, preventing and eliminating hazardous conditions and the risks of employee injury. Ensure that Supplier employees are not under the influence of or in possession of illegal drugs or alcohol while on Hub or its customers' or suppliers' premises or while providing products or services for Hub. All forms of workplace violence, at Hub and Hub customer or vendor locations, are strictly prohibited. Follow Hub safety rules while on Hub property.

Environmental Policy: Obtain and maintain all required environmental permits, regulatory approvals and registrations and comply with all applicable environmental laws and regulations while engaged in work for or on behalf of Hub. Strive to limit adverse impact to the environment, conserve resources, limit greenhouse gas emissions, and efficiently transport customers' goods while providing products or services for Hub. Manage chemicals and hazardous materials appropriately to ensure their safe handling, movement, storage, use and disposal. Supplier must promptly notify Hub when, in the course of providing services or products to Hub, it is involved in any chemical or material release which may pose a threat to the environment.

Protection and Proper Use of Hub Assets: Hub assets shall only be used for legitimate Hub-related business purposes. Protect such assets from loss, damage, misuse, removal, and waste. Comply with the intellectual property ownership rights of Hub and others, including but not limited to copyrights, patents, trademarks, and trade secrets.

Confidentiality and Data Privacy: Maintain the confidentiality of confidential information entrusted to you by Hub, unless disclosure is authorized by Hub or required by law. Only disclose or discuss Hub confidential information with other Supplier employees who have a need to know and only for the purpose for which such information was provided to Supplier. Confidential information includes all non-public information that might be of use to competitors of Hub, or harmful to Hub or its customers if disclosed and also includes personal information such as the name, address, phone numbers, medical, personnel or identification information of individuals.

Suppliers are required to utilize best in class practices, security procedures and systems to safeguard Hub's information from loss or dissemination and maintain a measurable documented emergency response and disaster recovery plan to ensure the protection of data and intellectual property and the business continuity of the services and/or goods being provided to Hub.

Insider Trading: Federal law prohibits securities trading by individuals in possession of material nonpublic information. Suppliers' employees who learn of material nonpublic information about Hub may not trade in Hub's stock until that information has been disclosed publicly and may not "tip" or give such information to anyone.

Publicity: Do not issue press releases or other publicity related to your relationship or contracts with Hub without the prior written consent of Hub. Suppliers are prohibited from utilizing the name or trademarks of Hub for their own marketing or publicity without Hub's express written consent.

Audit: While Suppliers are expected to self-monitor and demonstrate their compliance with this Code of Conduct, Hub may, in its sole discretion, audit Suppliers or inspect Suppliers' facilities to confirm compliance at reasonable times and upon reasonable notice. Suppliers are required to cooperate in such audits or related investigations fully and candidly. Suppliers that behave in a manner that is unlawful or inconsistent with the Code, or any applicable Hub policy, risk, among other remedies, termination of their business relationship with Hub. Complying with the Code is required in addition to meeting any other contractual obligations to Hub.