



Environmental Protection Policy



ENVIRONMENTAL PROTECTION POLICY
POLICY NO. 120 B-10-2022

This Policy is final only if a First Coast Terminals approval stamp appears above. Only the most recently approved Policy is effective. All other versions are superseded.

1. PURPOSE

First Coast Terminals, LLC (the “Company”) recognizes that an integral part of its business is protecting the environment. This policy for environmental protection (this “Policy”) demonstrates the Company’s commitment to complying with environmental regulatory requirements.

2. SCOPE

This Policy applies to all employees of the Company, within the United States and globally, to the extent the application of its provisions does not violate local law.

3. POLICY

3.1 Environmental Protection

The Company is committed to protecting the environment and takes a proactive approach to complying with legal requirements.

3.2 Legal Requirements

a. U.S. Law & Enforcement

The Company complies with applicable federal, state, and local environmental laws.

b. Compliance Outside the United States

Countries outside the United States may (or may not) have similar laws. Company employees traveling, residing, or working outside the United States must comply with this Policy whether or not the country in which they travel, reside, or work has similar laws or policies regarding environmental protection.

3.3 Environmental Standards

The Company has not only complied with relevant laws; it has also exceeded environmental standards.

For example:

- The Company is a leader in the U.S. maritime industry in its use of alternative fuels,

significantly reducing emissions while complying with all, and in many cases surpassing the environmental standards in its trade routes along U.S. coastlines.

- The Company was the first in the world to build liquefied natural gas powered container ships.
- The Company established the first industrial rain garden in the Puget Sound region, which helps to eliminate heavy metals in storm water.
- For more information, please see <http://toteinc.com/about/safety-environment/> About the Company: Safety and Environment information.
- The Company has also received numerous awards and accolades for its environmental commitment.

3.4 Guiding Principles

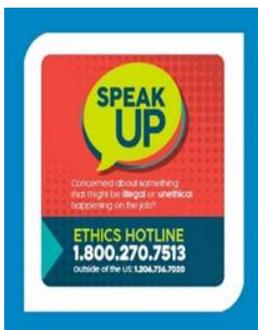
In accordance with relevant law and the desire to exceed the requirements of the law and regulations, the Company, where possible:

- Uses energy-saving products and equipment and related technologies.
- Conserves natural resources.
- Attempts to recycle and reuse materials.
- Employs systems and procedures to minimize the use of hazardous materials and waste.
- Strives to prevent the release of substances that may cause environmental harm to the air, water, or land.
- Continually seeks opportunities to improve its environmental performance.
- Attempts to assess environmental progress and make improvements when necessary.
- Promotes its pledge to environmental protection to suppliers and customers and others by informing them of its own commitment and responsibility and encouraging them to do the same.

3.5 Responsibilities of Employees

The Company expects its employees to be committed to the protection of the environment. Employees are required to comply with Company rules and guidelines in this regard, as well as any applicable federal, state, and local laws regarding environmental protection.

3.6 Reporting of Violations



Employees are obligated to report unethical or illegal behavior that they witness. If you witness a violation, tell your supervisor, the Company's Human Resources Department, or General Counsel.

You can also visit www.saltchuk.com/hotline to prepare a report that is confidential and anonymous. You may also raise the issue anonymously through the Saltchuk Resources Hotline by dialing 1-800-270-7513. The Hotline is managed 24/7 by an independent third-party reporting service.

If a matter is reported to a supervisor, the supervisor should inform the Company's Human Resources Department, or General Counsel as soon as possible. Supervisors and other responsible department executives who observe, are informed of, or reasonably suspect incidents of possible violations of this Policy must report such incidents to the Company's Human Resources Department, or General Counsel as soon as possible. Failure to report such incidents will be considered a violation of this Policy and may result in disciplinary action.

If there is a finding of a violation of this Policy at the conclusion of the investigation, the Company's Human Resources Department and/or General Counsel have the discretion to recommend several disciplinary options against the offender. The minimum disciplinary action is a verbal reprimand, and the maximum sanction is termination of employment of the offender, in accordance with the Company's Discipline and Dismissal Policy.

3.7 No Retaliation for Complaints

Company personnel, including management and Board members, may not coerce, intimidate, threaten, or interfere with any person who in good faith participates in any aspect of enforcement of this Policy. No one at the Company will suffer any adverse employment action or other form of retaliation for compliance with this Policy. For more information, please see the Speak Up: Whistleblowing and Non Retaliation Policy.

Acts of retaliation are a violation of this Policy and will result in disciplinary action, up to discharge and termination of employment. Nothing in this Policy is intended to prohibit or discourage employees from engaging in Protected Activities within the meaning of the U.S. National Labor Relations Act.

3.8 False Claims

Employees knowingly bringing false claims or accusations of potential violations of this Policy are subject to disciplinary action. If an employee knowingly brings a false charge, or knowingly provides incorrect information during an investigation, the Company will take appropriate disciplinary action up to and including termination, in accordance with the Company's Discipline and Dismissal Policy.

3.9 Administration of this Policy

Failure to follow this Policy may result in disciplinary action up to and including termination. Variances from this Policy are not permitted. All questions regarding this Policy should be directed to your supervisor, the Company's Human Resources Department, or General Counsel. This Policy is located on the Business Unit Team's channel.

3.10 Changes to Policy

The Company reserves the right to delete, modify, amend, or terminate this Policy at any time. The Company reserves the right to interpret this Policy. Employees are responsible for understanding or seeking clarification of any rules outlined in this Policy and for familiarizing themselves with the most current version of this Policy.

4. APPROVED VERSION HISTORY

	Version Date
Current Version	10/2022
Prior Versions	