

**Trailer Bridge, Inc.**  
**Code of Ethical and Professional Standards**

Trailer Bridge firmly believes in creating a work environment that cultivates imagination, innovation and productivity. We believe that all of our employees have available to them the tools and resources necessary to support our mission “to provide cost and service effective transportation that contributes to the success of both the customers and the company.” The interest of shareholders in all decisions is of paramount importance. As transportation professionals we value safety and must comply with state and federal regulations. Furthermore, Trailer Bridge wishes to advance open communication among employees because this company is dedicated to maintaining working conditions founded on mutual trust and respect as the best method to enhance shareholder value.

In order to encourage professional responsibility and to seek to remove barriers that only serve as obstacles to accomplishing our vision of enhancing shareholder value, Trailer Bridge has committed to setting ethical standards for all of our employees, agents, consultants, directors, and officers of the company with this Code of Ethics.

Nothing in this Code alters the at-will employment relationship of employees with Trailer Bridge and in no way forms an employment contract. Any employee who has a question regarding this Code or who needs to report possible violations of the Code should contact his or her supervisor, a manager within your chain of communication, or the Human Resources Department/General Manager, Corporate Administration at (904) 751-7142. Employees are subject to the provisions of the Code as long as they are employees of Trailer Bridge. Retaliation for reporting alleged violations or cooperating with an investigation of any violation of the Code will not be tolerated.

**Applicability**

This Code applies to all directors, officers, and employees of Trailer Bridge. It also applies to consultants, agents and other representatives. We must uphold these standards and hold one another accountable for ethical business conduct.

**Obey Laws and Regulations**

As a transportation company Trailer Bridge is subject to various governmental regulations. Employees must be able to manage the success of the business operation while maintaining compliance with all local, state and federal requirements. It is important that all employees know and understand the most current regulations and Trailer Bridge company policies. Employees should make every effort to ensure compliance with these rules.

**Record Keeping**

Maintaining business records is of critical importance to Trailer Bridge’s decision-making process and to the proper discharge of our financial, legal, and reporting obligations. Trailer Bridge requires employees, when documenting transactions for business-related purposes, to record them accurately. Business records, expense accounts, vouchers, bills, payroll documents, service records, reports to government

agencies, and other reports, books, and records should all be prepared with care. False or misleading entries in such reports are prohibited and may be illegal and may have an adverse effect on one's continued employment.

All Trailer Bridge's books, records, and accounts must be maintained according to the generally accepted accounting principles or standards established by applicable laws, regulations, and Trailer Bridge's accounting and internal control procedures.

It is the employee's responsibility to ensure that their integrity is above question, both within and outside the company. Positions in our organization that supervise employees, assets, cash flow or remuneration, require a responsibility to our shareholders and the organization. Employees in these positions must have a legal and/or employment record that would not bring in question the ethical practices of the person holding such positions.

#### Company Assets

As a general rule, Trailer Bridge does not allow employees to use company assets or services for their personal benefit or the personal benefit of others. If any use of assets or expenditures is not solely for the benefit of Trailer Bridge, approval in advance is required from the appropriate member of Senior Management, or supervisor. Misuse, theft or abuse of company assets will not be tolerated.

Some examples of company assets include but are not limited to:

- Company cars, tractors or trailers;
- Office space, fuel cards, or security badges;
- Unreasonable personal use of office equipment such as copy machines, fax machines and computer equipment;
- Unreasonable personal use of telephones, phone records, telephones cards, on board computers, email, and internet access.

There are some instances in which we allow employees to purchase company property. In these instances the employee must follow the defined process, and obtain proper receipts, before taking personal possession of any company assets.

#### Political Contributions and Activities

While Trailer Bridge does not wish to hamper employees' involvement in the political process as individuals, we require that this participation be in compliance with the law. For example, United States law prohibits corporate funds from being used to support political activity at the federal level both inside and outside of the United States. Some states have adopted similar laws.

The following political activities may be restricted and may not be undertaken without the approval of the Senior Management.

- Employees may not use their work time or their employee's work time for political activities.
- No employee may use company assets for political purposes.
- Trailer Bridge funds may not be used for political activity.

- Employees may make direct contributions of their own money, but such contributions may not be made in the name of Trailer Bridge. No political contributions made by the employee may be reimbursed through expense reports.
- No indirect contributions may be made through suppliers, customers or agents.
- Employees may not use their positions to coerce political contributions from other employees for the purpose of supporting a political candidates, political party, or political actions committee.

#### Antitrust Laws and Competition

The United States adopted antitrust laws to protect free enterprise by ensuring vigorous competition. These laws prohibit activities that restrain trade. Trailer Bridge requires that all employees strictly obey all applicable antitrust laws.

#### Confidential Information

Positions within Trailer Bridge require employees to handle confidential information about the company, our business, or companies and organizations with which Trailer Bridge does business. Trailer Bridge employees are required to keep all such information strictly confidential. Confidentiality standards apply to all employees and their spouses, parents, friends, children, brokers, etc. Do not disclose secrets, proprietary, or company information to anyone unless you have been authorized to do so. All employees are required to safeguard Trailer Bridge's confidential business and technical information and to use such information only for company purposes. Trailer Bridge also requires employees to secure all confidential documents.

#### Insider Trading

Until released to the public, material information concerning Trailer Bridge, including its plans, successes, or failures, is considered "inside" information and is therefore confidential. Inside information is "material" if it would likely affect a reasonable person's decision to buy, sell, or hold a company's securities, and it includes any information that could reasonably affect the price of a security. All such information is Trailer Bridge property. Inside information, either about Trailer Bridge or companies that have entrusted Trailer Bridge with proprietary information about their company may not be used for personal gain. Unauthorized disclosure of inside information, either about Trailer Bridge or about any of our business associates, is strictly prohibited.

#### Trade Secrets

Trailer Bridge has invested in the development of customers, services, and technology to makes us a leader in the transportation industry. In doing so, we have cultivated information that has given us a competitive edge. We call this information and technology our "trade secrets." All trade secrets must be kept confidential and secure. In addition to protecting its own trade secrets, it is Trailer Bridge's policy to respect the trade secrets of others. Trailer Bridge will not tolerate the violation of confidentiality or secrecy agreements or the improper acquisition of protected information.

### Disclosure of Accidents, Personnel, and Medical Records

Only those employees who are authorized to, and who have work related reasons, may access company accident, personnel, and/or medical records. These records should contain only related information. All matters related to accidents, employment, and medical conditions are confidential and should be kept secured. Trailer Bridge is dedicated to complying with the Health Insurance Portability and Accountability Act and with any other laws related to the confidentiality of records. Outside inquiries must be directed to the appropriate departments, e.g. Safety & Risk Management, or Human Resources.

### Harassment

Harassment of Trailer Bridge employees, sexual or otherwise, will not be tolerated at Trailer Bridge from anyone, including supervisors, co-workers, managers, vendors, clients, or customers. All Trailer Bridge employees are responsible for discouraging harassment in the workplace. We discourage any behavior whatsoever that can be construed to be in poor taste and/or offensive.

Trailer Bridge is committed to investigate all complaints thoroughly and promptly. All complaints and their terms or resolutions are kept as confidential as possible. Should an investigation confirm the occurrence of harassment, Trailer Bridge will take prompt disciplinary action. We reserve the right to take disciplinary action for behavior that interferes in any way with any individuals' ability to perform their job duties. Retaliation against those who reported harassment is forbidden. Please refer to Trailer Bridge's Harassment Policy or contact the General Manager, Corporate Administration at (904) 751-7142 for details of this policy.

### Discrimination

Trailer Bridge will not tolerate discrimination in employment on the basis of race, sex, sexual orientation, age, religion, lack of religion, political affiliation, veteran's status, color, national origin, disability, or other legally protected status. Trailer Bridge is committed to equal opportunity in all aspects of employment, including hiring, promoting, training, compensation, terminating, and disciplinary action.

The representatives of the customers, suppliers, and others with whom Trailer Bridge does business are required to abide by Trailer Bridge's equal opportunity and harassment/discrimination policies when they enter our facilities. Likewise, Trailer Bridge employees are expected to follow our discrimination and harassment policies in representing us with our customers, suppliers, and others.

### Fraternization

Trailer Bridge discourages fraternization between employees and/or employees of customers or vendors that interfere with employees' normal job duties, that disrupt the workplace, or that present a conflict of interest for the Company. Supervisors should not engage in romantic or intimate relationships with subordinates. To avoid misunderstandings, appearances of favoritism, morale problems and possible future sexual harassment claims, supervisors are strongly discouraged from pursuing romantic

or intimate relationships with employees they supervise either directly or indirectly. Consistent with this policy, fraternization is prohibited without prior management approval.

#### Nepotism

In order to avoid misunderstandings, appearances of favoritism, and/or morale problems Trailer Bridge does not allow the hiring of relatives. Employees who become related to one another after being employed by Trailer Bridge may both/all continue to be employed as long as there is no potential conflict of interest. In this case transfers, promotions, or hiring decisions that could result in a conflict of interest may be prohibited.

#### Dress Code and Professional Behavior

Each employee is considered a representative of the company. Trailer Bridge has the expectation that all employees will present themselves and the Company in a professional manner and in accordance with the Dress Code Policy. Unprofessional conduct such as excessive profanity at work or on a customer site; fighting or assault on a co-worker, customer, security personnel, or visitor; threatening or intimidating co-workers, security personnel, customers, or visitors; or engaging in language or behavior of lewd, violent or distasteful behavior is prohibited.

#### Substance Abuse

Trailer Bridge believes in an illegal drug free workplace. The Company prohibits any employee from using illegal drugs or alcohol in the workplace. Trailer Bridge will not tolerate substance abuse in the workplace. Employees who report to work with detectable appearance and/or odor of alcohol may be subject to a reasonable suspicion test in accordance with the Drug and Alcohol Policy. For details of our substance abuse practice, please see our Drug and Alcohol Policy.

#### Reporting Illegal/Unsafe Behavior

Any employee who receives a report of, has knowledge of, or suspects the occurrence of a felony arrest or unsafe behavior of a fellow employee during work hours, on company property or while operating company equipment should promptly report the behavior. An employee who is arrested for a felony or unsafe behavior should report the arrest to his or her supervisor so that the Company can determine whether there is any conflict with the employee's ability to do his or her job.

#### Conflicts of Interest

A conflict of interest arises when an employee has an interest in any business or property or an obligation to any person who might affect the employee's fulfillment of their job responsibilities to Trailer Bridge and/or their obligation to benefit Trailer Bridge shareholders. Any employee contemplating an activity in which personal interests could conflict or appear to conflict with the interests of Trailer Bridge, must disclose the activity to his or her immediate supervisor.

- Employees or their immediate families may not sell goods or services to Trailer Bridge without obtaining approval by the Designated Compliance Officer.

Exceptions to this provision may be made for the sale of charitable items however, Trailer Bridge reserves the right to determine whether the sale of such charitable items present a conflict of interest or presents the appearance of pressure on the employees to purchase such items.

- Employees must not own or have interest in competitors or suppliers; this restriction does not apply to a minimal ownership of stock or securities of a corporation whose shares are publicly traded.
- Employees should avoid outside employment and behaviors that would have a negative impact on their job performance for Trailer Bridge. Such employment or behavior must not conflict with their obligations to Trailer Bridge, or in any way negatively affect Trailer Bridge's reputation.
- Employees should not solicit or distribute materials without management approval during work hours or on company property. Solicitation of sales material or material that is political, religious, obscene or vulgar is prohibited.
- Employees must obtain approval before working for a Trailer Bridge customer, supplier, or competitor if such work is related to the services or assignments. The employee may not begin work until it has been determined that such work is not contrary to Trailer Bridge's interests.
- Employees may not use more than immaterial Trailer Bridge work time or any company assets for personal benefit.
- As a general rule, employees may not directly supervise the work of immediate family members including spouses or hold positions in which one position can influence the decisions of the other. Only Senior Management may make an exception to this rule.

#### Gifts, Gratuities, and Entertainment

Corporate culture in the United States has condoned giving material gifts, gifts of entertainment, and gratuities as business courtesies. Unfortunately, some gifts and gratuities have been used in an attempt to influence others. In an effort to reduce this influence, Trailer Bridge employees are not allowed to accept a gratuity other than one of immaterial value. While no strict dollar amount is observed, each such gift or gratuity should be viewed in light of all surrounding circumstances. Each employee offered such a gift or gratuity should determine whether such gift or gratuity is of significant value to be intended to influence a decision made by such employee as an employee of Trailer Bridge. Should an employee be in doubt about a gift or gratuity before it is received or receive an unsolicited gratuity of this nature that cannot be returned to the vendor, the item received should be given to the General Manager, Corporate Administration to determine appropriate action.

#### Reporting Violations of the Code of Conduct

Trailer Bridge employees are required to report any suspected violation of the law or applicable regulation of this code to their supervisor, chain of command or the General Manager, Corporate Administration. In addition, supervisors should be aware that it is their responsibility to enforce this Code of Conduct and to report any violation of the law or applicable regulations to their manager, and/or the General Manager, Corporate Administration.

Employees may also report violations of the Code of Conduct to The Network, an independent reporting service that allows employees to communicate their concerns anonymously and confidentially via Internet or telephone anytime, day or night.

Report Online: [www.reportlineweb.com/TrailerBridge](http://www.reportlineweb.com/TrailerBridge)  
Call Toll-Free: 877-350-0369

Trailer Bridge employees who in good faith report suspected wrongdoing are not subject to retaliation or discipline for having reported a violation of the Code. If an employee self reports a violation of this Code, the fact that he or she reported the violation will be given appropriate consideration in any resulting disciplinary action.

#### Disciplinary Action

Appropriate disciplinary action, up to and including termination of employment, may be taken against any employee, officer, or director whose conduct violated applicable laws or regulations including this Code. Discipline may extend to individuals responsible for the failure to prevent, detect, or report a known violation.