KIRBY CORPORATION
BUSINESS ETHICS GUIDELINES

October 2026

Effective, October 26, 2026, Kirby Corporation updated the Guidelines. There were no substantive changes to the policies in the Guidelines to reflect its updated Artificial Intelligence Use Policy.

Following are the Business Ethics Guidelines as revised.

Instructions For Viewing Policies Within This Document

As you read through the Business Ethic Guidelines there will be links to policies throughout the document. To view the policy click the link highlighted in blue. You will then be asked to sign into your Kirby email account.



Once your logged in, the policy will open, after reading the policy click the red “X” in the top corner of your screen, to return to the Business Ethic Guidelines.

A Word from the CEO



David Grzebinski
CEO

The reputation of Kirby Corporation and its subsidiaries is critical to our success. We have a longstanding reputation as the premier marine transportation company in the United States and a full service distributor of parts & equipment to the oil and gas industry, commercial and industrial companies as well as the leading manufacturer and remanufacturer of pressure pumping equipment. This reputation is built not only on the excellence of our service and safety record, but also on our high ethical standards and firm commitment to honesty, integrity and fair dealing. Kirby is committed to complying with all applicable laws, both in letter and in spirit and continuously improving our safety record.

Our Company has established certain values that were deemed essential to preserve the Kirby culture. Those core values are **"THE KIRBY WAY"** and are memorialized as follows:

Safety	Our guiding principle is **No Harm** to people, the environment or equipment. Safety is at the core of everything we do and always guides our decision making.
People	**Our people make the difference.** We invest in the tools and resources to empower our employees and we promote a workplace that values mutual respect, knowledge sharing and teamwork.
Integrity	**Do the right thing** by having the highest ethical standards while always being transparent and accountable for your actions.
Excellence	**Creating value** for our customers and shareholders by providing the highest quality service and products.
Community	**Sharing our success** with each other and the communities where we live and work by protecting the environment and encouraging volunteerism.

While our goals and priorities change over time, our Core Values remain the same. We share these values across our businesses worldwide.

Upholding legal standards of conduct, while mandatory for every employee, is not enough. We are also responsible for maintaining the ethical standards of these Guidelines. These standards govern how we treat and value all employees. These are standards of integrity... honesty... trust... respect... fair play... and teamwork. These are the standards we want Kirby to continue to uphold in the years to come. Your company believes that its behavior as a business should reflect the commitment to the values set forth in these "Business Ethics Guidelines".

While it is important that each of you read the Guidelines, I also would like to share a test that I apply when I am confronted with a difficult ethical situation. I call it "the Thanksgiving Test." If you can't comfortably explain your conduct or actions to your family and loved ones at the Thanksgiving dinner table, then you probably shouldn't be doing it.

The actions of a single employee can undo the reputation that Kirby has built over more than 130 years. Consequently, each of us must take responsibility to act in a safe, legal and ethical manner at all times.

Your actions every day help make us the safest, most respected company in the marine and distribution and services businesses.

Thank you for your commitment to Kirby, our Business Ethics Guidelines and to "Always Doing the Right Thing."

David Grzebinski

Kirby ESI United Holdings LLC MSI Stewart & Stevenson

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Purpose of the Guidelines

The purpose of these Business Ethics Guidelines ("Guidelines") is to help you understand how Kirby Corporation, its divisions, subsidiaries and affiliates worldwide (individually and collectively, "Kirby" or the "Company") is committed to doing business.

The Guidelines sets forth general guidelines of business practices, but does not endeavor to cover every law or policy that applies to each of us. It is intended to:

- ***Educate*** you about the laws that affect our business
- ***Serve as a guide*** to help you understand the type of behavior we expect from you
- Explain ***where to go for advice and to report possible misconduct***

Who must follow the Guidelines?

All employees, officers, directors, contractor, third party and business partner acting in connection with or on behalf of Kirby and any other person or entity acting on behalf of Kirby (collectively referred to as "employees" in the Guidelines) ***must follow the Guidelines.***

Obey the Law

Kirby employees are required to comply with all applicable laws and governmental regulations wherever we do business. The local laws of one country may affect how we do business in another country. It is important that you understand not only the local laws that apply to you in your home country, but also how you might be affected by the laws of other countries. If a law conflicts with a policy in the Guidelines, you must comply with the law; *however*, if a local custom or practice conflicts with this Guidelines, you ***must*** comply with the Guidelines. If you have any doubts, contact your supervisor or the Legal Department.

What is expected of me?

We expect you to lead by example.

As an employee, you are obligated to:

- *Read, know and comply with these Guidelines*

Duty to Report Violations

- If you observe any unethical or unlawful conduct or conduct that you believe creates a potential conflict of interest, ***you have a duty to report it.***

- ***Promptly*** report any suspected violations of the Guidelines or the law to your supervisor or to any of the individuals identified throughout the Guidelines,

Remember, you should not fear retaliation for reporting suspected misconduct.

Kirby will not tolerate any retaliation against you for reporting a violation of law, rule, regulation or the Guidelines.

The law may also prohibit retaliation against employees who report a concern or complaint about unlawful conduct.

Your failure to bring violations to the attention of appropriate Company personnel could result in very serious harm to the Company.

Guidelines Questions and Concerns

This section of these Guidelines provides details to help you get answers and advice on the Guidelines and explains how to report any concerns.

Expectations of Compliance

We all have an individual responsibility to live up to the standards that are set forth in the Guidelines. Failure to adhere to the values and compliance standards may result in disciplinary action, which could include termination for serious offenses.

If you are not an employee, violations of the Guidelines can result in termination of your business arrangement with the Company, and you may be barred from our facilities.

Did You KNOW?

Your responsibilities to uphold these Guidelines extend to some off-duty circumstances as well. Conduct that occurs off-work may violate the Guidelines if the conduct is unlawful, could damage the Company's reputation, business interests or operations or could impact your qualification to do your job.

Questions and Concerns

You are encouraged to speak up if you suspect misconduct so we can investigate it.

See Section "Guidelines Questions and Concerns" for guidance on:

- Who to talk to about questions you may have about the Guidelines
- How to report a concern or a violation of the Guidelines or applicable law



Safety Policy

Safety

Our Goal: NO HARM to People, to the Environment or to Equipment

You and everyone you work with or supervise are responsible for adhering to our Safety Policy.

Safety Policy

The Company is committed to creating and maintaining a safe work environment. It is the responsibility of **every employee**, both ashore and afloat, **every contractor and consultant** to be familiar with and adhere to this safety policy:

ALL EMPLOYEES HAVE THE DUTY TO EXERCISE STOP WORK RESPONSIBILITY FOR THEIR SAFETY AND THE SAFETY OF THOSE AROUND THEM

- All injuries and accidents can be prevented. ***Our goal is zero injuries.*** This goal is considered realistic and attainable but only you can make it happen.
- Management will **comply** with all applicable federal, state and local requirements or appropriate industry standards.
- All levels of supervision have the **responsibility** for the safety of the employee.
- It is possible for you to guard against workplace conditions that may result in an occupational health risk, accident or injury. When the source of risk cannot be eliminated, special work processes, safety devices, personal protective equipment, or other protective measures must be used to safeguard employees.
- It is the responsibility of managers and supervisors to provide adequate training and supervision for employees. It is the responsibility of the employee to think, to use common sense and to work safely.
- Adherence to safety rules and safety instructions from supervisors is a requirement for employment.

All employees, contractors and consultants are required to follow our Safety Policy.

Equal Opportunity

Company Values - Equal Opportunity

The Company is an equal opportunity employer. The Company is **committed** to recruiting, hiring, promoting, retaining, and compensating all individuals on the basis of their qualifications and performance, without regard to race, color, ethnicity, national origin, religion, age, sex, sexual orientation, gender, gender identity, disability, veteran status or any other characteristic protected by law. Our goal is to provide a workplace free from offensive conduct including oral or written comments, postings on social media, email or while using Company electronic devices, in addition to conduct physical or suggestive in nature. Comments and conduct directed to or referencing an individual's color, race, age, ethnicity, national origin, gender, religion, or disability, even if innocently intended, do not further the Company's business and may, in fact, undermine the professional, respectful, and cooperative work environment that is a Company corporate value.

Open Door Policy.

The Company is committed to its Open-Door Policy where an employee with a concern must **communicate** that concern up the chain of command, including to the Chief Executive Officer if necessary, if a concern is not resolved to an employee's satisfaction. Employees **commit** to follow the procedures of the Open-Door Policy to ensure that no concern is left unaddressed.

Applicable Policies and Helpful Information

- Safety and Occupational Health

Discrimination and Sexual Harassment

We do not tolerate discrimination against any individual based upon ***race, color, religion, sex, national origin, age, disability, sexual orientation, marital or family status, military status, or other factors unrelated to our business interests.*** The use of racial or religious slurs or any other remarks, jokes, or conduct that encourages or permits an offensive work environment will not be tolerated.

We do not tolerate harassment against employees because of their race, religion, national origin, sex (including pregnancy) gender (including sexual orientation), gender identity and gender status) age, physical or mental disability, citizenship, genetic information and military service.

Sexual harassment is not always overt or deliberate. Even innocent or unintentional behavior may constitute harassment and may have a negative effect on others. To minimize the risk of discrimination or sexual harassment, employees should refrain from intimate relationships with co-workers that could interfere with work performance or make other employees uncomfortable.

We will not tolerate sexual advances, actions, comments or any other conduct in the workplace that creates an intimidating or otherwise offensive environment.

Violence in the Workplace

Safety is our number-one priority.

Acts or threats of violence in physical, written, electronic or verbal form are not conducive to a safe and secure work environment, and any such behavior will not be tolerated.

Employees and non-employees are prohibited from bringing guns or other weapons onto our property (which includes but is not limited to guns and weapons in our parking lots), unless local law prevents us from enforcing this policy.

Applicable Policies and Helpful Information

- MARINE- U.S.
  - Equal Employment Opportunity Policy
  - Discrimination and Harassment Policy
- DISTRIBUTION & SERVICES
  - US
  - U.K./Europe
  - South America/Colombia
    - Personal Harassment Policy
    - Equality Policy
- WORKPLACE VIOLENCE POLICIES
  - U.S.- U.K./Europe Work Place Violence Policy

Drugs and Alcohol

Anyone under the influence of drugs or alcohol at work is a safety risk. Therefore, the use, possession, sale, distribution or purchase of alcohol or illegal drugs or any other controlled substance (except for approved medical purposes) while on Company business (except for approved social events), or while operating Company equipment, machinery or vehicles, is strictly prohibited.

You may not enter Company property for any reason under the influence of alcohol or illegal drugs or with detectable levels of alcohol or illegal drugs in your system.

We have a zero-tolerance policy concerning the use of drugs or alcohol in the workplace.

Applicable Policies and Helpful Information

- Drug and Alcohol Policy
  - U.S./Europe Drug and Alcohol Policy
- Distribution & Services- South America/Columbia Drug and Alcohol Policy Drug and Alcohol Policy- Spanish
- Social Media Policy
  - Social Media Policy

Be aware that all social media accounts created or used by employees or contractors on behalf of the Company, including all log-in information, passwords and contact associated with each account remain solely owned by the Company.

Social Media

Changes in technology are influencing the way that employees communicate, both internally and externally. Social media and other online tools empower us to reach a wide range of audiences, and it is important to take certain steps when making references to the Company in these settings.

Employees must not post anything online that may be construed as representing the Company.

Do not use the Company logo or trademarks on a personal website, blog or social media page in a way that suggests Company sponsorship.

Any postings that appear on Facebook, Twitter, LinkedIn, a personal website or blog, or other social media can potentially be seen by customers, shareholders and other audiences with a direct interest in the Company. If you use these tools, you should:

- Not post comments or photos of customers or suppliers without their permission
- Never post information about Company earnings, business dealings or other details
- Inappropriate postings may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct and they will not be tolerated. You are subject to disciplinary action up to and including termination.
- Not comment in any manner on pending legal matters, responding to news media, financial analysts, or industry analysts to discuss any matters relating to Company strategy or business.

Any and all media inquiries or requests for commentary should be immediately referred to the Vice President - Public and Governmental Affairs. Questions concerning this policy should be directed to the Executive Vice President and General Counsel or the Chief Human Resources Officer.

Public Disclosure

It is our practice to disclose material information about the Company publicly, accurately, completely and consistently - not selectively.

As a public company, Kirby Corporation is required to disclose certain information to the Securities and Exchange Commission (SEC) and the public. It is important to Kirby Corporation that all disclosure in reports and documents that are filed with, or submitted to, the SEC, and in other public communications by Kirby Corporation, is full, fair, accurate, timely and understandable.
The Company is committed to **fair disclosure** of information about the Company without advantage to any particular analyst or investor, consistent with securities laws. **All information** disclosed outside of the Company (for example, to the media, investors or the general public) must be accurate, complete and consistent, and disseminated in a manner intended to ensure broad and contemporaneous distribution.

Only authorized spokespersons should speak with the news media or publicly discuss Company business.

If anyone outside the Company asks you to provide information or participate in surveys, you should refer them to the Vice President - Investor Relations or Vice President - Public and Governmental Affairs and they will handle the inquiry.

Applicable Policies and Helpful Information

- Securities Law and Insider Trading Policy
  - Securities Law and Insider Trading Policy
  - Media Relations Policy
- Respecting Human Rights
  - Anti Human Trafficking Policy

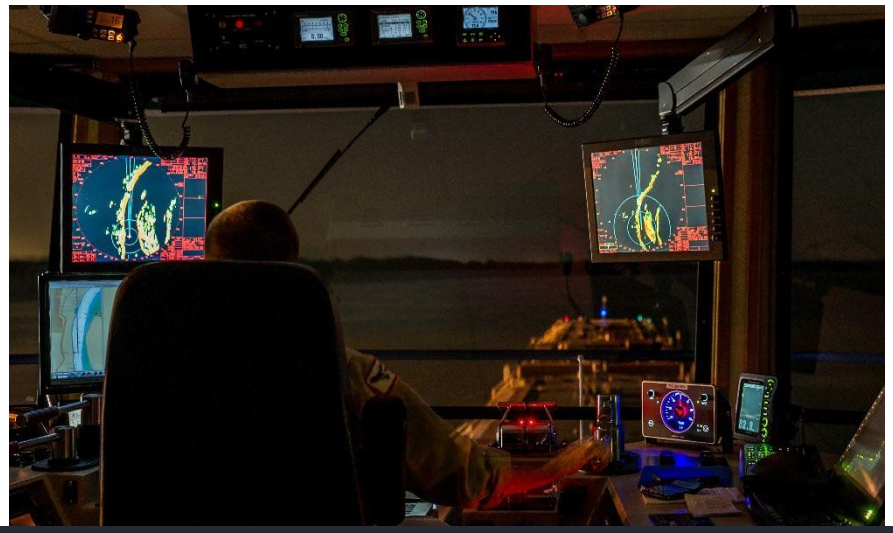
Respecting Human Rights

Our Guidelines, along with other Kirby policies, establish practices and standards that address a broad range of human rights and workplace issues.

Kirby is committed to making a positive contribution to human rights and society.

You should:

- Always respect the human rights of those with whom you work and come into contact as a Kirby employee.
- Never knowingly work with anyone known or suspected to be acting in a way that infringes basic human rights, such as not complying with wage and hour laws, or permitting exploitation of children, or not respecting a choice to join or not join a trade union.
- Encourage partners, suppliers and other third parties to adopt similar standards with respect to human rights.



Relationships with Stakeholders

Our Business Ethics Guidelines outline our commitment to stakeholders who have an interest in our activities or are affected by them. It informs these stakeholders of what they can expect from us and provides reassurance that our Company is well-managed and maintains high standards. We have structured our Guidelines to clearly identify the key groups affected by our activities.

Relations with our customers, investors, suppliers and contractors

We operate in an environment of trust, and we do not tolerate any fraudulent or dishonest behavior by our employees either within the Company or in dealing with our customers, investors, suppliers or contractors. You must always adhere to ethical business conduct in your dealings with other Company employees and our stakeholders.

Relations with governments and communities

Success in business depends on compliance with laws, together with sensitivity to local customs and conventions governing business relationships. The communities in which we operate, and from which we draw our employees, are the core of our business franchise.

We are committed to making a positive contribution to the sustainable development of the communities in which we operate.

We take into account the concerns of the entire community – including national and local interests – in all our operations. We use our expertise to contribute to the well being of the community in a manner appropriate to our business objectives.

Our success is driven by our commitment to our stakeholders

Fair Competition

You are expected to act in a manner that will enhance the Company's reputation for honesty, integrity, and faithful performance in support of long-term, mutually beneficial business relationships.

You may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

Remember the following when you deal with others:

- You must **be truthful** in your representation of the Company. If there is a mistake or misunderstanding, you must correct it immediately.
- You must accurately represent Company services in all public statements and advertising, promotional materials, sales representations, warranties and guarantees**. Never** provide misleading information.
- You must sell Company services on their merits. **Do not** make false or misleading remarks about a competitor's organization, its employees, or its services. When comparisons are made between a competitor and Kirby, they must be accurate and factual.
- You must strive to select suppliers who provide the highest quality at the lowest total cost. Prospective suppliers should have a chance to compete fairly for our business, just as we wish to **compete fairly** for our customers' business.

Fair Competition (cont'd)

Unfair methods of competition and unfair or deceptive acts and practices will not be tolerated and many jurisdictions have laws designed to protect customers and competitors. While it is impossible to list all types of prohibited conduct under these laws, **some examples** include:

- *Commercial bribery or payoffs to induce business or breaches of contracts by others*
- *Acquiring a competitor's trade secrets through bribery or theft*
- *Making claims concerning our services without a reasonable basis for doing so*
- *Making false or deceptive claims or comparisons regarding competitors or their services*

You should always be mindful of these guidelines when dealing with others, and you should govern yourself accordingly. ***Remember, your actions create our reputation.***

Antitrust

Antitrust laws are intended to preserve a free and competitive marketplace. Some violations of antitrust laws are felonies, and individuals as well as companies can be convicted, with jail terms as a possible result. In addition, substantial damages can arise from any antitrust violation.

You should remember that discussion of any of the following subjects with competitors, whether relating to our products or theirs, may be **prohibited** by antitrust laws:

- Past, present or future prices or pricing policies
- Lease rates
- Bids, discounts, promotions, profits, costs, terms or conditions of sales, royalties, warranties, choice of customers, territorial markets, production capacities or plans and inventories

Any discussion of these topics or an agreement that could limit competition in a specific market may be a violation of antitrust laws and must be reviewed by the Executive Vice President and General Counsel.

Trade association meetings have the potential to give rise to antitrust issues. At any trade association meeting, you should not participate in any formal or informal discussion regarding the following topics:

- Prices
- Discounts
- Terms and conditions of sales
- Allocating or prioritizing geographic markets or products
- Bidding on specific contracts or customers
- Standardization of terms among competitors
- Conspiring to exclude competitors

If you become aware of any formal or informal discussion of the topics in the lists above, then you should immediately report your concerns to the Legal Department.

Conflicts of Interest

Conflicts of interest can happen when your personal interests or activities (or those of a member of your family) interfere with, or even appear to interfere with, those of the Company or its subsidiaries. This includes when you are in position to influence a transaction or decision in such a way that it will, or might appear to, benefit you or your family member.

Personal interests and activities should not influence decisions made on the Company's behalf

Conflicts of interest are prohibited. To protect the best interests of the Company, any potential conflict of interest must be discussed with the Human Resources Department so that it can be resolved in an ethical manner. Potential conflicts involving Executive Officers or members of the Company's Board of Directors must be reviewed by the Company's Governance Committee.

The following situations have potential for a conflict of interest:

- Ownership (by you or a family member) of a material financial interest in, or provision of services to, any outside enterprise that does or seeks to do business with, or is a competitor of, the Company.
- Acting as a broker, finder or intermediary for the benefit of a third party in transactions involving the Company or its interests.
- Becoming indebted to any concern whose business may be affected by your actions on behalf of the Company.
- Voting, influencing, or making recommendations regarding a Company transaction or decision when you have (or a family member has) a material interest in an entity or property involved in the transaction or decision.
- Participating in activities outside the Company that interfere with your ability to serve the Company.
- Using knowledge, confidential information or influence gained as a result of your employment for personal profit or financial gain for you or a family member.
- Any arrangement or circumstance, including family or other personal relationships, that might cause you not to act in the best interest of the Company. All relationships must be disclosed to the Company under the Employment of Relatives Policy.

Trade Controls

In the course of doing business, the Company **must** comply with import and export trade laws and restrictions issued by recognized authorities, including the United Nations, the European Union and the United States, which are designed to prevent or limit trading with certain countries or their nationals. ***Note: Export controls govern many types of exchanges of information across national borders, including e-mail transmissions and web access to different servers that could contain certain controlled data.***

If you are involved in the transfer of goods or services across national borders on behalf of the Company or our customers, you should:

- Be familiar and comply with these laws, regardless of your location.
- Maintain accurate information on the commodity, commercial value and country of origin of imported goods.
- Always consult with the Legal Department for guidance on this topic should you have questions.

Applicable Policies and Helpful Information

- Trade & Export Control Policy
- Conflict of Interest
- Employment of Relatives

Cooperate Fully and Honestly in Investigations

There may be occasions when the Company may be the subject of an outside investigation by law enforcement or other government agencies with oversight of the Company's operations in your geography. During the course of these investigations, officials may need to access and review Company documents, e-mails or other written materials.

If you are questioned by a Company or external official in an investigation, you must be truthful and forthcoming. Destruction or falsification of any document that is potentially relevant to a violation of law, a government investigation or a legal proceeding may lead to prosecution for obstruction of justice.

If you have questions regarding destruction or retention of documents, or about speaking with an external investigator, please ask the Legal Department.

In the course of an investigation by law enforcement or a government agency, the investigators may seek access to a Company-owned location, either through a request or by presenting a search warrant. In the event of any such request, please contact the Legal Department immediately.

Business Travel

The Company requires employees to use good judgment in incurring expenses. Personal or excessive use of an expense account without permission could subject you to disciplinary action, up to and including termination.

By submitting an expense report either in writing or electronically, each employee certifies that all expenditures are true and correct, clearly and accurately described, and supported by receipts as required. The employee and the person authorizing the expense report is responsible for the propriety of the contents.

Necessary and reasonable expenses are allowable when properly described and documented with legible explanations. Tax regulations require that each expenditure be supported by an explanation of the business purpose of the expenditure.

Exceptions to the policy will be reviewed with the employee and his/her supervisor and/or department head and may require:

- Further explanation or substantiation for questionable expenses.
- Repayment of reimbursements previously made for expenses incurred in violation of applicable policies.
- Removal of company-sponsored payment privileges (credit cards, etc.).

Applicable Policies and Helpful Information

- Travel & Entertainment Policy
- Employee Travel and Entertainment Expenses

Gifts and Entertainment

You should not accept gifts, meals or entertainment that may influence, or may give the appearance of influencing, your ability to make decisions in the best interest of the Company. You also should not give, offer or promise gifts, meals or entertainment that are intended to influence (or that may appear to influence) or place a third party under an obligation to you or the Company.

You may give or receive nominal gifts, meals or entertainment from third parties that are unlikely to influence and will not be viewed as a bribe, kickback or payoff. Care should be taken to ensure that gifts, meals or entertainment do not violate any:

- Laws
- Generally accepted ethical standards
- Standards of the recipient's organization

Cash or cash equivalents are never acceptable forms of gifts or entertainment. As an example, gift cards are a cash equivalent and accepting gift cards from vendors is a violation of this policy.

Frequent Gifts or Business Courtesies.
You should avoid a pattern of accepting frequent gifts or business courtesies from the same persons or companies as it may give the appearance of impropriety or preferential treatment.

In the context of giving or receiving gifts, meals or entertainment, the following are examples of activities that are generally permissible, provided they are bona fide, business-related and freely offered:

- A reasonably priced golf outing, sporting event or entertainment ticket in the local area on an occasional basis may be reasonable. Accepting a fully paid trip out of the local area to attend a golf outing, sporting event or entertainment event **requires** approval in accordance with the Reporting and Approval requirements of this policy.

- Accepting an offer for an expense paid trip for pleasure with a customer or supplier is **not permitted**. Work-related transportation, lodging and expenses are paid by the Company directly or on a pro-rated basis for if the expenses are incurred on a combined work and personal trip consistent with the Company's existing travel and entertainment policy.

Compensation.

No Company employee nor any member of his/her family should solicit or accept payment of a commission, fee, salary or other form of compensation from an existing or potential Company supplier or customer.

Special Restrictions with Respect to Government Employees and Public Officials.

What is acceptable practice when dealing with other private businesses may be entirely unacceptable, and even illegal, when dealing with public officials or other government employees. The Company requires strict compliance with laws and regulations relating to gifts and business entertainment. If you have any questions concerning dealing with government employees or public officials, contact the Company's Executive Vice President and General Counsel. See also Anti-Corruption section below.

Applicable Policies and Helpful Information

- Anti Corruption Policy and Procedures
- Anti Corruption Policy and Procedures- Spanish Version
- Employee Travel and Entertainment Expense

Gifts and Entertainment Reporting and Approval

All employees who either give or receive gifts or business courtesies are required to follow the below reporting and approval schedule:

Gifts or business courtesies with a value of **$100 or more** should be reported to the employee's immediate supervisor.

Gifts or business courtesies with a value of **$250 or more** require prior approval from the employee's immediate supervisor.

Gifts or business courtesies with a value of **$500 or more** require prior approval from the President of Kirby Inland Marine, the President of Kirby Offshore Marine or the President of Kirby Distribution & Services, as applicable.

Gifts or business courtesies with a value **of $1,000 per person or $3,000 per event** or more require prior approval from the Company's President.

Gifts or business courtesies with a value of $2,000 per person or $5,000 per event require prior approval from the Company's Chief Executive Officer.

Expenditures in connection with **use of Company entertainment venues or offers to fly private aircraft** require the advance approval of the President and the Chief Executive Officer.

Government & Political Activities

You are encouraged to support the political parties and candidates that advocate your views.

However, unless you are acting in an official capacity on behalf of the Company, all political activities must take place outside of your employment hours and must not reference Kirby Corporation or any of its affiliates. You may not use Company resources in such activities, unless you have first obtained approval from the Vice President - Public and Governmental Affairs.

You are encouraged to participate in trade and professional associations that promote the Company's goals, individual skills development and professional recognition. Participation must not conflict with the Company's interests.

If you seek elective office or accept an appointive office, you must notify your manager and indicate how the duties of the office will affect your job performance. If you have any questions, please contact the Vice President - Public and Governmental Affairs.

Dealing with Suppliers

Kirby expects its suppliers to abide by the Company's Business Ethics Guidelines. Our suppliers are expected to "live like we do" in regard to safety, ethics and high standards of business conduct.

All purchasing decisions must be based on the best total value received by Kirby. In all dealings with current or potential suppliers, be sure to work through the appropriate Company contacts. **No Company employee** nor any member of his/her family should solicit or accept payment of a commission, fee, salary or other form of compensation from an existing or potential Company supplier.

Any attempt by a supplier to improperly influence a purchasing decision should be reported to the Legal Department. If you have any questions when dealing with a supplier, contact the Supply Chain Department.

Employees should never participate in price fixing, customer or market allocation, bid rigging or any related practices

These laws also require all books, records and accounts of the Company, domestic and foreign, to accurately and fairly reflect business transactions and dispositions of Company assets.

Applicable Policies and Helpful Information

- Government and Political Activities

Anti-Corruption

The United States Foreign Corrupt Practices Act of 1977 (and amendments) (FCPA) prohibits the Company and its shareholders, agents, officers and employees from making or authorizing payment of money or anything of value, directly or indirectly, to non-United States government officials, political parties or candidates for political office outside the United States to win or retain business or influence any act or decision of such officials.

The FCPA prohibits offering or promising to make a gift or any other payment to any non-U.S. government official, (including employees or agents of government bureaus or departments, or state-owned or controlled companies), or to any political party (or employee or representative thereof) or political candidate outside the United States for the purpose of obtaining or retaining business or obtaining any unfair advantage. The FCPA also requires publicly traded US companies like the Company to make and keep accurate books and records, and effective internal accounting controls.

This U.S. law applies throughout the world to actions by the Company, all Company personnel and representatives, and all Kirby subsidiaries, affiliates, and joint ventures. The FCPA imposes severe criminal and civil penalties against both the individual involved and his or her employer.

The United Kingdom Bribery Act (UK Bribery Act) and other local Anti-bribery laws prohibit similar payments to any person or corporation, not just to non-United States government officials. Facilitating payments seeking to ensure approval of business activities or transactions are also prohibited under Anti-Bribery laws.

Because of the broad coverage and severe penalty provisions of the FCPA and UK Bribery Act, it is imperative that you **immediately report** to the Company's Chief Financial Officer and Executive Vice President and General Counsel, any transaction that appears to violate Anti-Corruption laws.

Books and Records

These laws also require all books, records and accounts of the Company, domestic and foreign, to accurately and fairly reflect business transactions and dispositions of Company assets.

Third Party Representatives, Distributors, Agents and Consultants

The Company will not authorize any distributor, agent, or consultant to do any act that is prohibited by these Business Ethics Guidelines or the Company's Anti-Corruption Compliance Policy and Procedures.

Third Party Representatives must be adequately screened and approved before they are permitted to act on the Company's behalf.

If there is a conflict between this summary and the Policy, the language in the Policy applies.

Outside Board Service

To avoid conflicts of interest, prior to accepting a position on a public company Board of Directors, all employees are required to obtain approval from Kirby's Chief Executive Officer and Board of Directors. Further, all employees are required to obtain approval from their supervisor and notify Kirby's Executive Vice President, General Counsel and Secretary prior accepting a compensated position as an officer, director or consultant outside the Company.

Applicable Policies and Helpful Information

- Anti Corruption Policy and Procedures
- Anti Corruption Policy and Procedures- Spanish Version

Engaging Third Parties, Consultants

Consultants and agents retained by the Company must adhere to the Guidelines in the course of their work on our behalf.

Special care should be taken to ensure that:

- No conflict of interest exists between the Company and the consultant or agent, or any such conflict is disclosed and managed
- The consultant or agent is genuinely qualified in the business for which retained
- The compensation being paid is reasonable
- There is written agreement outlining the statement of work under which the consultant or agent agrees to abide, and the written agreement requires compliance with all applicable laws and the Guidelines
- As applicable, the third party is vetted and approved consistent with the ***Company's Anti-Corruption Policies and Procedures*** before they are retained.

Consultants and agents may not be retained to do anything illegal or improper. **Do not attempt to engage a consultant to do anything that you are prevented by law or the Guidelines from doing yourself.**

For additional guidance, contact your local Human Resources Department or the Legal Department.



Applicable Policies and Helpful Information

- Anti Corruption Policy and Procedures
- Anti Corruption Policy and Procedures- Spanish Version

Financial Records, Accounting and Internal Controls

Any dishonest reporting of information to organizations or people outside the Company is also strictly prohibited and could lead to civil or even criminal liability for you and the Company. This includes not only reporting information inaccurately but also organizing it in a way that is intended to mislead or misinform those who receive it.

Our financial and accounting records and supporting information must be maintained properly to comply with legal requirements and our internal controls. All individuals who are responsible for recording or reporting this information shall do so promptly, accurately, completely and honestly.

Company policy prohibits:

- Knowingly making or causing others to make a materially misleading, incomplete or false statement to an accountant or an attorney in connection with an audit or any filing with any governmental or regulatory entity (such as the New York Stock Exchange or the U.S. Securities and Exchange Commission)
- Directly or indirectly falsifying or causing others to falsify any Company or client documentation
- Omitting, or causing others to omit, any material fact that is necessary to prevent a misleading statement in connection with any audit, filing or examination of the Company's financial statements
- Opening or maintaining any undisclosed or unrecorded corporate account, fund or asset or any account with a misleading purpose
- Using reports or records to mislead those who receive them or to conceal anything that is improper
- Any action to fraudulently influence, coerce, manipulate or mislead the accountant or auditor engaged in the performance of an audit of the Company's financial statements

Financial Accountability

We must always provide stakeholders with financial information that is accurate, complete, objective, fair, relevant, timely and understandable, including in our filings and other submissions to the U.S. Securities and Exchange Commission, tax regulators and other public bodies.

The Company's success in the marketplace is built upon the trust and confidence of those who invest in us, and we are dedicated to protecting their long-term interests.

- We aim to generate an attractive rate of return on a long-term basis, through the responsible use of assets entrusted to us.
- We are committed to a high standard of corporate governance and accountability.
- Our accounting statements will be true, timely, complete and available in an easily understandable form.

We give confidence to our shareholders through relevant and timely communications.

If you believe that the Company's records are not being maintained in accordance with these requirements, then you should report the matter directly to a Company officer, to an Ethics Compliance Committee member, or to the Company's ***Compliance and Ethics Hotline.***



Purchasing Cards and Expense Accounts

If you have been issued a Company credit card, ***then you must use that card only for the legitimate purchase of Company materials and permissible services.***

You are fully responsible for the use of your card, and you must report lost or stolen cards immediately.

If you have a corporate expense account, then you are entitled to reimbursement for reasonable expenses, but only if those expenses are actually incurred. Submitting an expense account for meals not eaten, miles not driven, airline tickets not used or for any other expense not incurred is against the law and against Company policies.

Anti-Money Laundering

Kirby complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. “Money laundering” is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the source of their illegal funds look legitimate.

You should always ensure that you are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. **Check for “red flags”** such as requests from a potential customer or supplier for cash payments or other unusual payment terms.

If you suspect money laundering activities, you need to report your concerns immediately.

Applicable Policies and Helpful Information

- Purchasing and Accounting Policies
- Employee Travel and Entertainment Expenses

Use of Corporate Assets

You are responsible for protecting Company assets. These include cash and cash equivalent investments, physical assets, trade secrets, technology and other proprietary information. Managers are responsible for establishing and maintaining controls to protect assets from loss or unauthorized use. We are all responsible for assisting in the prevention of waste and theft of corporate assets and assuring the integrity of our controls.

The Company's computer resources, telephones and electronic resources are considered Company assets. Limited personal use of the Company's computer resources (including the Internet and Intranet) and telephones and other related equipment is permitted so long as the use:

- Is authorized by a Company officer
- Is within reason and not abused
- Does not interfere with job performance

Corporate business opportunities are also corporate assets and should only be used to advance the legitimate interests of the Company. You may not take personal advantage of corporate business opportunities that come to you through the use of corporate property, corporate information or your position at the Company. *All contents of the Company's IT resources and communication systems are the property of the Company.*

You may not use corporate property, corporate information or your position at the Company for personal gain, and you may not compete with the Company.

Applicable Policies and Helpful Information

- Corporate Assets
  - All Corporate, Marine, and Distribution & Services – Information Technology Policies and Procedures

Artificial Intelligence Use Policy

Today's technology includes artificial intelligence ("AI Tools"). AI Tools may be used for Kirby business only where permitted by the Company's Artificial Intelligence Use Policy and with the advance approval of Kirby's Chief Information Officer. Use of unapproved or personal AI accounts for Company work is prohibited. The Company's Artificial Intelligence Policy which requires:

- **Approved tools and licensing.** Use only Company – approved AI Tools consistent with applicable licensing requirements, information security requirements and any required authorization or approval.
- **Protect Company, customer and personal information.** Follow Kirby's data-classification, security, privacy and records-management requirements. Safeguard, retain and share AI-generated sensitive information only as permitted by Kirby policy and law.
- **Compliance with law and Kirby policies.** Never use AI Tools in violation of any law or Kirby policy, including the Business Ethics Guidelines, Insider Trading Policy, Supplemental Insider Trading Policy (where applicable), Information Technology Policies and Procedures. Do not use AI Tools to trade on inside information, commit fraud, manipulate markets, fix prices or engage in other anti-competitive – alone or with others - whether for Kirby, yourself or anyone else. For example, never use AI Tool output as a basis to trade in shares or commodities, including shares of Kirby Corporation, its customers or competitors.
- **Transparency and records.** Treat prompts, outputs and related materials as Company records under the Records Management Policy; use of Company systems may be monitored.
- **Employee review and accountability.** You are responsible for AI-assisted work and must verify outputs before use or external sharing.
- To the extent AI Tools generate personal sensitive information, such information should be protected and not disseminated further except in the course of scope of the individual's employment or engagement by Kirby and in accordance with Kirby policy and applicable law. Such information could include, for example, individual tax identification or banking information.

Artificial Intelligence Use Policy

Confidential Information

From time to time, you may become aware of Company confidential information. Confidential information is information not generally known to the public that, if disclosed, might be of use to competitors or be harmful to the Company, its competitive position or its customers.

You may not disclose or use any confidential information gained during Company employment or any other Company relationship for personal profit or advantage, and you must maintain the confidentiality of this information except when disclosure is authorized or legally mandated.

Examples of confidential information include, but are not limited to:

- Computer programs, data, formulas, software and compositions
- Customer and supplier information, including pricing and costs
- Non-public financial data
- Freight rates, routes and division structures
- Marketing and sales programs
- Employee personal information and compensation information
- Possible acquisition or divestiture activity
- Regulatory approval strategies
- Strategic business plans or transactions

Confidential Information (cont'd)

Except as specifically authorized or legally mandated, you are expected to maintain the confidentiality of information entrusted to you by the Company or its suppliers or customers. This requirement applies both during and after your employment or service to the Company.

Confidential information should not be:

- Discussed within hearing range of unauthorized persons, such as in elevators (even on Company property), restaurants, taxis, airplanes or other public areas
- Left where it is accessible to unauthorized persons or in other areas that are not secure (i.e. on printers, faxes or openly visible on a desk)
- Disclosed to family, relatives, or business or social acquaintances

In instances where it is appropriate for business reasons to disclose Company confidential information to third parties, the Legal Department must be contacted before the disclosure and, when deemed necessary, an appropriate agreement that includes the necessary safeguards may be entered into.

Securities Law and Insider Trading

Securities laws and Company policy prohibit the buying or selling of securities while in the possession of "material, non-public information."

Material, non-public information is information that:

- Has not been released to the public, and
- A reasonable investor would consider important in deciding whether to buy, sell or hold securities

Examples of material, non-public information include:

- Acquisitions and divestitures
- Changes in key management
- Changes to significant contracts or customers
- Financial earnings figures and trends
- Important information on litigation, contracts or joint ventures

Material, non-public information does not have to relate to the Company's business. For example, it could include information about the contents of a forthcoming story in the financial press that is expected to affect the market price of a security, or information about a transaction.

It is against the law for you to:

Buy or sell securities while in the possession of material, non-public information

Disclose material, non-public information to any unauthorized recipient (including relatives, friends or business associates), regardless of the purpose for which the disclosure is made

Have anyone else purchase or sell securities on your behalf, or for their own benefit, based on material non-public information. Any such purchases or sales made by another person, or on their behalf, could be attributable to you and are illegal

For any questions on whether certain information fits the definition of material, non-public information, please consult with your supervisor or the Legal Department.

Short-term investment activity in the Company's securities, such as trading in or writing options, arbitrage trading or "day trading," as well as hedging transactions related to Company securities, is not appropriate under any circumstances and are prohibited.

In addition, employees should not take "short" positions in the Company's securities or engage in transactions involving puts, calls and other derivative securities related to Company stock.

If you are notified by the Finance Department that you are a Key Employee, you are subject to stricter standards than those described above, including prohibitions on securities trading during certain times and pre-clearance requirements as set out in the **Company's *Securities Law and Insider Trading Policy.***

Applicable Policies and Helpful Information

- Securities Law and Insider Trading
  - Securities Law and Insider Trading Policy
- Records Management Policy
  - Records Management Policy

Records and Document Retention

Destruction or falsification of any document that is potentially relevant to a violation of law, a government investigation or legal proceeding may lead to prosecution for obstruction of justice.

All entries in the Company's books, records, and accounts and all documents created must be accurate, complete, and fairly reflect our business transactions. The recording of all financial transactions must conform with generally accepted accounting practices. False or misleading data supplied in connection with any aspect of the Company's business, whether for internal Company purposes or external use by a supplier, customer or the government, is not tolerated.

If you have been notified that you should retain documents, or if you believe that a violation of the law has been committed or that a Company or government investigation is underway or is about to commence, then you must retain all records (including documents, computer records and other files) that could be relevant to an investigation of the matter.

We keep documents and records in forms that enable efficient retrieval. All Company records will be kept for the shortest time needed to comply with applicable laws, regulations, policies and the Company's records and documents retention program. We keep documents and records that describe our business activities for enough time to ensure that we have fulfilled our obligations and promises.

Documents and records include any medium, regardless of physical format, which memorializes information created or used by the Company. (i.e., paper documents, audio or video tapes, magnetic or optical media, microfilm or microfiche, voice mail and computer-based information such as electronic mail, computer files on disk, servers or tape, and any other medium) Employees are prohibited from tampering with these documents or removing or destroying them prior to the dates



Copyright Protection and Use Policy

Copyright is a type of intellectual property that ***protects*** original works of authorship. Under the US Copyright Act, copyright arises automatically when an author creates an expressive work if the work is both ***original and fixed form.*** ***Examples of fixed forms*** **include,** written materials, newsletters, publications, website content, computer software programs, photographs, artwork, songs**.** Copyright **does not** protect ideas, systems, methods of operation, titles, general layouts, formats, common symbols and designs.

A copyright provides its owner with a bundle of exclusive rights in a protected work. The primary **exclusive rights** are as follows:

- **Reproduction** (making copies of a work).
- **Distribution** (transferring ownership of a copy of a work, or transferring custody, but not ownership, of a tangible copy, for example, through rental or lending).
- **Public performance**.
- **Public display** (showing a copy of a work in a place open to the public or where a substantial number of people other than family members and acquaintances are gathered).
- **Derivative works** (making adaptions of a work, for example, translations, art reproductions, or a motion picture based on a book).

Protecting Kirby's Copyrights

Kirby employees must protect Kirby Corporation copyrights and the value of these assets from infringement by others.

In general, works created by Kirby employees in the scope of their employment are owned exclusively by Kirby as works made for hire under the US Copyright Act. Materials created by third-party independent contractors for Kirby may, in some cases, also be works made for hire. Contact the Legal Department prior to engaging any third-party independent contractors to confirm and secure copyright ownership in contractor work product.

Proper Use of Third-Party Copyrights

Employees may need to use third-party copyrighted works in their work for Kirby, including, for example, software, photographs, images, professional publications, journals, reports or published data.

It is against Kirby policy for any employee to copy, scan, digitize, distribute, broadcast, perform, excerpt, modify, translate, distribute, transfer or otherwise use any third-party copyrighted works, whether for personal use, internal or external Kirby use, or use by others, in violation of copyright laws.

Use of third-party copyrighted works generally requires permission or a license. If a work was created by a third-party contractor, **confirm** the terms of the written agreement. If there are questions or if the contractor has entered into a written agreement, contact the Legal Department.

Providing information regarding the source, author, or owner of a work does not eliminate the need to obtain permission or a license for use of the work. If there are any questions regarding the permissibility of using third-party copyrighted works, please contact the Legal Department for additional guidance.

Kirby also respects the copyrights of others. Improper use of copyrighted materials by Kirby employees could expose the employees and Kirby to substantial civil and criminal penalties.

All employees are required to comply with federal copyright law and this policy.

Applicable Policies and Helpful Information

- Copyright Protection and Use Policy

Environmental Regulations

Kirby is committed to environmental excellence.

We live and work in the communities where we do business, and we expect you to support our responsible environmental practices and initiatives. We strive to avoid negative effects on the environment of the communities where we operate.

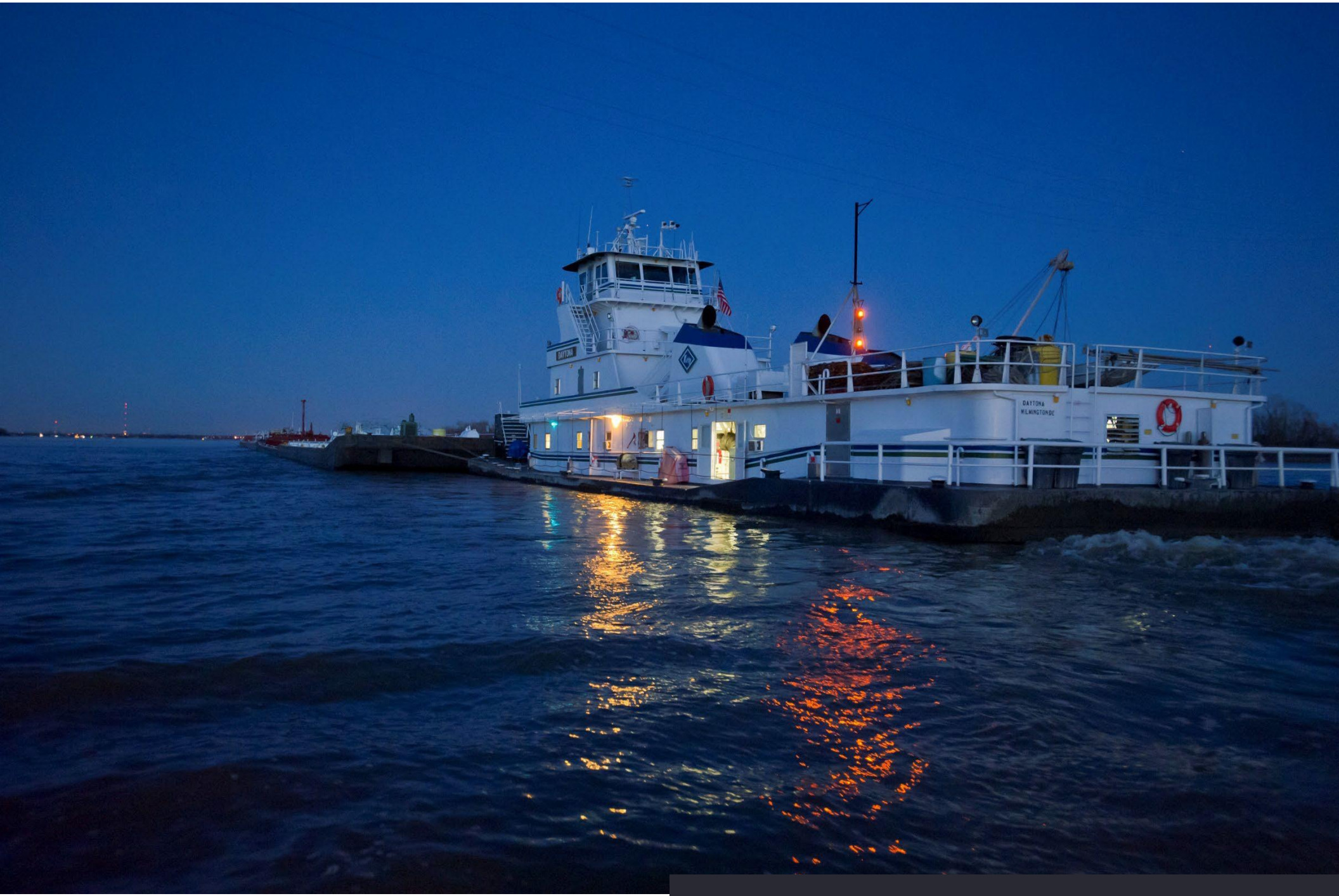
We require strict adherence to environmental laws. All vessels and facilities must have the required environmental permits, approvals, plans and controls in place.

You are expected to **understand** the requirements for your area of responsibility and to report accidents and unsafe practices or conditions to your supervisors or other designated people.

Applicable Policies and Helpful Information

- All Kirby Companies Worldwide
  - Environmental Policy




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Guidelines *Questions* and Concerns

Who to Contact with Questions?

If you have ***any questions*** on a particular situation, the following options are available:

- **Review** any additional policies that may apply and contact the appropriate departmental resource;
- **Ask** your supervisor or local Human Resources representative for guidance;
- **Contact** a member local senior leadership; or
- **Ask** the Legal Department if you have questions about applicable laws.



Human Resources Contacts

Jenny McCauley
Chief Human Resources Officer
(713)435-1024
Jenny.McCauley@kirbycorp.com

Legal Department Contacts

Amy Husted
Executive Vice President, General Counsel & Secretary
(713)435-1068
Amy.Husted@kirbycorp.com

Guidelines Questions and *Concerns*

Compliance and Ethics Hotline

Kirby implemented a Compliance and Ethics Hotline to allow for **anonymous** reporting of any concerns. The toll-free phone numbers below allow anyone to **call 24 hours a day**, **any day of the week**, and speak with a third party in his or her local language.

There are **several avenues** for reporting conduct or situations that you believe to be illegal, unethical or in violation of these Guidelines. The Company takes very seriously allegations of non-compliance and will take appropriate steps to investigate such allegations. Company personnel are expected to cooperate if contacted in connection with an investigation.

We all have an obligation to:

- Read, know and comply with the Guidelines
- Adhere to the Guidelines and ask questions if you are concerned about actions not compliant or lawful
- ***Promptly report any suspected violations of the Guidelines or applicable law***

U.S.	**1-800-565-0389**
Colombia	**01-800-5191202**

Outside the United States, go online at www.KirbyCorpEthicsHotline.com, select your desired country from the list and use the telephone number displayed. Multiple languages are supported by both the website and telephone service.

As a rule, you should report violations, suspected violations, or concerns to your immediate supervisor or Company contact, or to a more senior member of your management chain.

- Any matters alleging material financial impropriety, including those involving a financial position of finance director or controller (or a direct report to the finance director or controller), or officer-level position or higher;
- Any material matters alleging non-compliance with applicable federal, state or local laws or regulations;
- Any matters alleging or threatening a collective or class action;
- Any material matters alleging deliberate non-compliance with written company policies; or
- Any matters alleging inappropriate action by senior leadership.

However, if you believe the sensitivity of an issue so warrants, you should contact:

Chief Human Resources Officer	(713) 435-1024
Executive Vice President, General Counsel & Secretary	(713) 435-1068
Company's Chief Executive Officer	(713) 435-1432

Guidelines *Questions , Concerns, or Waiver of Policies*

Compliance and Ethics Hotline

Anonymous Reporting

HOTLINE

If you prefer to remain anonymous when reporting a violation or suspected violation you may call **1-800-565-0389 (U.S.) or 01-800-5191202 (Colombia)** to leave a confidential voice-mail message. Reports to the hotline are confidential and provide each employee with the opportunity to voice concerns for the Company's further handling. Multiple languages are supported by both the website and telephone service.

WRITTEN COMMUNICATION

You may also submit ***anonymous reports*** by sending an unsigned written communication to the following address or to www.KirbyCorpEthicsHotline.com for further handling:

Counsel &

Kirby Corporation
c/o Legal Department
Attn: Executive Vice President, General Secretary
55 Waugh Drive, Suite 1100
Houston, Texas 77007
***Please mark the envelope as confidential;**
To be opened by recipient only;

The hotline reports as well as all written complaints are monitored by the Executive Vice President, and General Counsel who reports matters to the Director of Internal Audit, Chief Human Resources Officer , Chief Financial Officer and the Chief Executive Officer of the Company. To the extent that any officer is alleged to be engaged in suspected activity, the investigation will be limited to ensure that the report or the integrity of the investigation is not compromised.

The Company has a **zero-tolerance** approach to retaliatory acts taken against individuals who make reports in good faith. If you become aware of a retaliatory act, report it immediately. Individuals engaging in retaliation are subject to appropriate disciplinary actions, including possible termination

Kirby Corporation will not tolerate any retaliation against you for reporting a violation of law, rule, regulation or these Guidelines.

WAIVER OF POLICIES

Any waiver of these Business Ethics Guidelines for executive officers or directors requires approval by Kirby's Board of Directors, or a designated Board Committee, and shall be promptly disclosed to stockholders.