



SEKO Logistics **Antitrust Policy**

General Policy:

SEKO Logistics (“SEKO” or the “Company”) conducts its business ethically and in compliance with all laws in the countries where SEKO does business, including all state, federal and international antitrust laws such as the U.S. Sherman Act, U.S. Clayton Act, U.S. Federal Trade Commission, as amended, and EU Antitrust Laws. SEKO Representatives MAY NOT directly or indirectly communicate with the “competition” and display any form of unlawful restraints, price-fixing, price discrimination, exclusive dealing arrangements, conspiracy, monopolies, prices, profit margins, and/or discounts in any engagements. Compliance with the law requires obedience both to the letter and spirit of the law.

A basic tenant of SEKO policy is that no employee shall enter into any understanding, agreement, plan or scheme, whether express or implied, formal or informal, oral or written, with any competitor with respect to prices, terms or conditions of sale, output, production, distribution, territories or customers. SEKO absolutely prohibits any consultation with competitors relating to prices or terms and conditions of sale.

For purposes of clarity, some examples of conduct that may be construed as unlawful and contrary to Antitrust laws include, but are not limited to:

- (a) price-fixing with the competition;
- (b) rigging bids with the competition;
- (c) conspiring with the competition;
- (d) destruction of documents in an effort to achieve or hide any of the foregoing motives; and
- (e) price discrimination.

ANY INFRACTION OF THE COMPANY’S ANTITRUST POLICY OR THE ANTITRUST LAWS WILL SUBJECT ANY EMPLOYEE TO LEGAL PENALTIES AS WELL AS CORPORATE DISCIPLINE, UP TO AND INCLUDING DISMISSAL FROM EMPLOYMENT.

Complaints/Reporting:

In the event that you believe that a SEKO Representative’s business conduct or practices is in violation of this Policy, you have an obligation to do the following:



Send email to ethics@sekologistics.com. Subject line: Antitrust Alert, body of email include the senders signature. You will be contacted immediately by our Legal/Compliance department.

No Retaliation for Reporting:

SEKO will protect the confidentiality of the allegations to the extent possible and appropriate under the circumstances. If you feel uncomfortable making a complaint/reporting under your name, you may make the complaint anonymously. SEKO will actively investigate all complaints under this Policy, and if it is determined that a violation has occurred, SEKO will take appropriate disciplinary action against the offending party, up to and including discharge of the employee or termination of the agreement with such SEKO Representative. SEKO will not take or permit retaliation against any person who has complained about Antitrust Laws violations, or who otherwise participated in an investigation of such complaints.

Any SEKO Representative who receives a complaint/reporting from a member of the public should advise the person to report his or her complaint directly to email ethics@sekologistics.com

SEKO will not pay any fines, penalties or legal expenses assessed against a SEKO Representative who is found guilty of violating any Antitrust Laws and who acted contrary to this policy.

It should be noted that this brief statement is not intended to be a complete statement of all aspects of the antitrust laws or Company policy. If you should have any questions respecting antitrust policy, please contact the office of the General Counsel.