



**SEKO Logistics**  
**Anonymous Hotline Policy**

**General Policy:**

SEKO Logistics (“SEKO” “We” 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 laws. In short, we are committed to always doing the right thing. For that reason, we have adopted a Code of Conduct and Ethics Policy as well as introduced an anonymous hotline specifically designed to be part of an effective program to prevent and detect, as well as report, possible violations of law and conduct. SEKO encourages its employees, agents, and worldwide partners to raise concerns that will help us with our commitment to ethical, moral and legal business conduct. This policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee feels that their anonymity is not required then they should follow our existing grievance procedure.

**Scope:**

The anonymous reporting hotline is intended to cover serious concerns and/or sensitive issues that could have a large impact on SEKO Logistics, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with company policy, including the Code of Conduct and Ethics Policy; or
- Otherwise amount to serious improper conduct.

**Reporting a Complaint:**

**Toll-Free Telephone:**

- English speaking USA and Canada: (844) 510-0059
- Spanish speaking North America: (800) 216-1288
- French speaking Canada: (855) 725-0002
- Spanish speaking Mexico: 01-800-681-5340
- All Other Countries: 800-603-2869 (must dial country access code first)

**Website Reporting:** [www.lighthouse-services.com/sekologistics](http://www.lighthouse-services.com/sekologistics)

**Reports can be filed in a number of languages which can be selected from the website, or the direct url can be found below:**

Language Abbreviation	Language Name	Direct URL
ara	Arabic	<a href="http://www.lighthousegoto.com/sekologistics/ara">www.lighthousegoto.com/sekologistics/ara</a>
ben	Bengali	<a href="http://www.lighthousegoto.com/sekologistics/ben">www.lighthousegoto.com/sekologistics/ben</a>
csm	Chinese (Simplified)	<a href="http://www.lighthousegoto.com/sekologistics/csm">www.lighthousegoto.com/sekologistics/csm</a>
ctr	Chinese (Traditional)	<a href="http://www.lighthousegoto.com/sekologistics/ctr">www.lighthousegoto.com/sekologistics/ctr</a>

cze	Czech	<a href="http://www.lighthousegoto.com/sekologistics/cze">www.lighthousegoto.com/sekologistics/cze</a>
dan	Danish	<a href="http://www.lighthousegoto.com/sekologistics/dan">www.lighthousegoto.com/sekologistics/dan</a>
dut	Dutch	<a href="http://www.lighthousegoto.com/sekologistics/dut">www.lighthousegoto.com/sekologistics/dut</a>
eng	English	<a href="http://www.lighthousegoto.com/sekologistics/eng">www.lighthousegoto.com/sekologistics/eng</a>
fil	Filipino	<a href="http://www.lighthousegoto.com/sekologistics/fil">www.lighthousegoto.com/sekologistics/fil</a>
fin	Finnish	<a href="http://www.lighthousegoto.com/sekologistics/fin">www.lighthousegoto.com/sekologistics/fin</a>
fre	French	<a href="http://www.lighthousegoto.com/sekologistics/fre">www.lighthousegoto.com/sekologistics/fre</a>
geo	Georgian	<a href="http://www.lighthousegoto.com/sekologistics/geo">www.lighthousegoto.com/sekologistics/geo</a>
ger	German	<a href="http://www.lighthousegoto.com/sekologistics/ger">www.lighthousegoto.com/sekologistics/ger</a>
gre	Greek	<a href="http://www.lighthousegoto.com/sekologistics/gre">www.lighthousegoto.com/sekologistics/gre</a>
heb	Hebrew	<a href="http://www.lighthousegoto.com/sekologistics/heb">www.lighthousegoto.com/sekologistics/heb</a>
hin	Hindi	<a href="http://www.lighthousegoto.com/sekologistics/hin">www.lighthousegoto.com/sekologistics/hin</a>
hun	Hungarian	<a href="http://www.lighthousegoto.com/sekologistics/hun">www.lighthousegoto.com/sekologistics/hun</a>
ind	Indonesian	<a href="http://www.lighthousegoto.com/sekologistics/ind">www.lighthousegoto.com/sekologistics/ind</a>
ita	Italian	<a href="http://www.lighthousegoto.com/sekologistics/ita">www.lighthousegoto.com/sekologistics/ita</a>
jpn	Japanese	<a href="http://www.lighthousegoto.com/sekologistics/jpn">www.lighthousegoto.com/sekologistics/jpn</a>
kor	Korean	<a href="http://www.lighthousegoto.com/sekologistics/kor">www.lighthousegoto.com/sekologistics/kor</a>
lav	Latvian	<a href="http://www.lighthousegoto.com/sekologistics/lav">www.lighthousegoto.com/sekologistics/lav</a>
may	Malay	<a href="http://www.lighthousegoto.com/sekologistics/may">www.lighthousegoto.com/sekologistics/may</a>
nor	Norwegian	<a href="http://www.lighthousegoto.com/sekologistics/nor">www.lighthousegoto.com/sekologistics/nor</a>
pol	Polish	<a href="http://www.lighthousegoto.com/sekologistics/pol">www.lighthousegoto.com/sekologistics/pol</a>
por	Portuguese	<a href="http://www.lighthousegoto.com/sekologistics/por">www.lighthousegoto.com/sekologistics/por</a>
rum	Romanian	<a href="http://www.lighthousegoto.com/sekologistics/rum">www.lighthousegoto.com/sekologistics/rum</a>
rus	Russian	<a href="http://www.lighthousegoto.com/sekologistics/rus">www.lighthousegoto.com/sekologistics/rus</a>
slo	Slovak	<a href="http://www.lighthousegoto.com/sekologistics/slo">www.lighthousegoto.com/sekologistics/slo</a>
som	Somali	<a href="http://www.lighthousegoto.com/sekologistics/som">www.lighthousegoto.com/sekologistics/som</a>
spa	Spanish	<a href="http://www.lighthousegoto.com/sekologistics/spa">www.lighthousegoto.com/sekologistics/spa</a>
swe	Swedish	<a href="http://www.lighthousegoto.com/sekologistics/swe">www.lighthousegoto.com/sekologistics/swe</a>
tha	Thai	<a href="http://www.lighthousegoto.com/sekologistics/tha">www.lighthousegoto.com/sekologistics/tha</a>
tur	Turkish	<a href="http://www.lighthousegoto.com/sekologistics/tur">www.lighthousegoto.com/sekologistics/tur</a>
ukr	Ukrainian	<a href="http://www.lighthousegoto.com/sekologistics/ukr">www.lighthousegoto.com/sekologistics/ukr</a>
vie	Vietnamese	<a href="http://www.lighthousegoto.com/sekologistics/vie">www.lighthousegoto.com/sekologistics/vie</a>

**E-Mail:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)

**Fax:** Fax alternative for written documents: 215-689-3885 (must include company name with report)

## **Safeguards:**

**Confidentiality.** Reporters to the hotline will have the ability to remain anonymous if they choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. However, your identity may become known during the course of the investigation because of the information you have provided. Reports are submitted by Lighthouse, the anonymous hotline reporting service, to SEKO Logistics or its designee, and all reports will be investigated at the sole discretion of our company.

Harassment or victimization of individuals submitting hotline reports will not be tolerated.

Malicious allegations may result in disciplinary action.

## **Timing.**

Keep in mind that the earlier a concern is expressed, the easier it is for us to take action.

## **Evidence.**

Although you are not expected to prove the truth of an allegation, the employee submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern.

## **How Reports will be Handled:**

The action taken will depend on the nature of the concern. A number of SEKO Logistics nominated individuals or designees will each receive a copy of the report and follow-up reports on actions taken by the company. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

## **Feedback to Reporter.**

Whether reported directly to SEKO Logistics personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made;
- Telling them whether further investigations will follow, and if not, why not.

## **Further Information.**

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

## **Outcome of an Investigation.**

At the discretion of the company and subject to legal and other constraints the reporter may be entitled to receive information about the outcome of an investigation.