



ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

I. Purpose.

SEKO Global Logistics Network, LLC and SEKO Worldwide, LLC (collectively “SEKO”) (and all entities controlled and/or affiliated with SEKO) have a strong and unwavering commitment to prohibiting human trafficking and slavery by any of its’ business entities, employees, and other parties associated with SEKO. In compliance with the law, and to effectuate SEKO’s commitment to prohibiting these practices, this Anti-Slavery and Human Trafficking Statement (hereafter referred to as the “Anti-Slavery Statement”) serves to ensure a work environment that is free from human trafficking, forced labor and unlawful child labor (Slavery and Human Trafficking). SEKO strongly believes that it is responsible for promoting ethical and lawful employment practices amongst the SEKO group of companies. These practices are also required to be followed by our suppliers, subcontractors or business partners worldwide (collectively “Suppliers”). SEKO strongly opposes any use of slavery or human trafficking in the distribution of its own products, or its client’s products, and fully supports the promotion of ethical and lawful business practice within our workplace.

II. Scope.

This policy covers all employees of SEKO and all of its subsidiaries or entities controlled by SEKO. In the event that anything in this policy may conflict with local law, local law will control the interpretation and application of this policy statement.

III. Definitions.

Human Trafficking: The recruitment, transportation, transfer, harboring or receipt of persons by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labor: All work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labor: Consists of the employment of children that is economically exploitative, or is likely to be hazardous to or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

IV. Rationale.

SEKO will not tolerate or condone the use of unlawful child labor or forced labor in the supply of goods and services it sells, and will not accept goods or services from suppliers that utilize child labor in any manner in any part of our organization. Human trafficking and slavery are intolerable crimes. These crimes exist in countries throughout the world. This statement shall define SEKO’s



efforts and commitment to eradicate human trafficking and slavery from not only our organization but also from our own supply chains.

V. Requirements.

SEKO's suppliers are an important part of our success and our culture. We expect each of these business partners to conduct their business with the same commitment to ethical business practices as SEKO.

SEKO and its suppliers:

- Will not use forced or compulsory labor, i.e. any work or service that a worker performs involuntarily, under threat of penalty.
- Will ensure that the overall terms of employment are voluntary.
- Will not hold passports of migrant workers.
- Will not pay fees to agents other than reputable temp worker agencies where there is an opportunity for workers to engage in temporary to permanent employment.
- Will comply with the minimum age requirements prescribed by applicable laws unless a specific contract contains stricter age requirements.
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay agreements.
- Will abide by applicable law concerning the maximum hours of labor – such as the provisions of Working time Directive(s) or other applicable laws.
- Will keep records of, and be entirely transparent in complying with the above.

VI. Consequences.

Suppliers of SEKO who engage in human trafficking and slavery will have their supply agreements terminated. Suppliers must be able to demonstrate compliance with this policy at the request and satisfactions of SEKO. If a supplier to SEKO is found to be in violation of this policy statement, SEKO will take prompt, remedial measures to address the violation including but not limited to termination of the business relationship and involvement of legal authority(s).