

## **Michigan Trucking, LLC and its Subsidiaries**

### **Ethics and Fraud Policy and Procedure**

#### **Procurement**

Employees of Michigan Trucking, LLC or any or all of its subsidiaries may not solicit, demand, accept, or agree to accept any economic opportunity, future employment, gift, loan, gratuity, special discount, trip, favor, or service in connection with the following:

- approving, disapproving, recommending, or preparing any part of a program requirement or purchase request or
- awarding a contract.

If you are uncertain as to the appropriateness of accepting any such benefits, ask your supervisor. When in doubt, ask.

If you observe or suspect unethical behavior in the procurement of a good or service by an employee, you should contact any of the following individuals or offices:

- Your supervisor, or
- Another member of management in their area, or
- Michigan Trucking, LLC's Chief Compliance Officer, Daniel C. Molhoek. . Employees may also call the Compliance Hotline at 1-616-336-6908 in confidence and anonymity.
- Email Mr. Molhoek at [dcmolhoek@varnumlaw.com](mailto:dcmolhoek@varnumlaw.com)
- Write Mr. Molhoek at Daniel C. Molhoek, P.O. Box 352, Grand Rapids, Michigan 49501-0352.

Also, see Exhibit A for more details.

Any person with a concern regarding a breach of ethics or a possible compliance matter should notify the Michigan Trucking, LLC compliance officer.