Reporting of Any Illegal or Unethical Behavior; Whistleblower Policy

Any individual who is aware of any illegal or unethical behavior or who believes that an applicable law, rule or regulation or the Employee Compliance Code (the “Code”) has been violated, must promptly report the matter to the Chief Compliance Officer or the General Counsel. In addition, an individual who has a concern about Landstar’s accounting practices, internal controls or auditing matters, should either report his or her concerns to the Chief Compliance Officer or the General Counsel or submit an anonymous written complainant in accordance with the following instructions. Individuals wishing to make an anonymous report with respect to Landstar’s accounting practices, internal controls or auditing matters may submit anonymous written complaints to the following address: Landstar System, Inc., Attention: Audit Committee, P.O. Box 16921, Jacksonville, FL 32245. Individuals should take care to report violations to a person who they believe is not involved in the matter giving rise to the violation. All reports of violations will be promptly investigated and, if appropriate, remedied, and if legally required, immediately reported to the proper governmental authority.

Individuals will be expected to cooperate in assuring that violations of the Code are promptly addressed. Landstar, if requested, will take all reasonable steps to protect the identity of anyone reporting a possible violation. However, complete anonymity cannot be guaranteed other than with respect to anonymous written complaints submitted in accordance with the instructions described above. In no event will there be any retaliation against someone for reporting an activity that he or she in good faith believes to be a violation of any law, rule, regulation or the Code. Any supervisor or other individual intimidating or imposing sanctions on an Individual for reporting a matter will be disciplined, up to and including termination.

Individuals are advised that it is a crime to retaliate against a person, including with respect to their employment, for providing truthful information to a law enforcement officer relating to the possible commission of any federal offense. Individuals who believe that they have been retaliated against by Landstar, any Landstar employees, or any Landstar agents or business capacity owners, for providing information to or assisting in an investigation conducted by a federal agency, Congress or a person with supervisory authority over the individual (or another individual who has the authority to investigate or terminate misconduct) in connection with conduct that the individual reasonably believes constitutes a violation of federal criminal fraud statutes or any rule or regulation of the Securities and Exchange Commission, may file a complaint with the Secretary of Labor, or in federal court if the Secretary does not take action in a timely manner.