To: Financial and Administrative employees and management of Rand Logistics, Inc., including the Lower Lakes Towing, Lower Lakes Transportation, and Grand River Navigation subsidiaries:

We realize that every manager and employee in our financial and administrative departments bring unique talents and skills to Rand Logistics, Inc. ("Rand") or its subsidiaries. We encourage you to openly share your questions and concerns with your management. However, we also understand that there may be times when you may not feel comfortable voicing any issues directly. To this end, we decided to establish a system to enhance communication within Rand, and provide you with a means to anonymously communicate your knowledge of any possible unethical behavior or fraud, particularly relating to accounting for our revenues, expenses, assets and liabilities (e.g our Financial Statements). This communication system, called SilentWhistle, is hosted by a third-party company - Allegiance, Inc. The anonymous information communicated through this web site or toll-free phone number goes directly to the Audit Committee, which is comprised of outside members of our Board of Directors. You can reach this web site by going to http://rand.silentwhistle.com. or you may call 1-877-874-8416, which is a toll free number.

We encourage employees to anonymously submit information regarding questionable, unethical or illegal activities within the organization. Examples include violations of Rand's (or one of its subsidiary's) ethical conduct policies, internal control policies, violations of laws, or other possible fraudulent activities. With more than a dozen customized alerts, SilentAlert will extract the most information possible from the person submitting the alert. This unique process also helps Rand quickly distinguish between serious threats and minor alerts. I am confident that SilentWhistle will be an effective means to provide valuable feedback if you become aware of any serious incidents involving fellow employees, management, suppliers, or customers. I sincerely respect and value each of your opinions, and hope you will feel comfortable using this system to communicate such problems and concerns. However, please respect our intentions of establishing an

anonymous feedback system by not abusing it. Remember, this site is not meant to be a complaint line.

The purpose of this Whistleblower Program is to maintain a workplace where concerns regarding questionable business practices can be raised without fear of any discrimination, retaliation or harassment. The Whistleblower Policy encourages all directors, officers, employees and consultants to promptly report either orally or in writing any activity that may constitute questionable accounting or auditing practices; inadequate internal accounting controls; misleading or coercion of auditors; disclosure of fraudulent or misleading financial information; instances of corporate fraud; a material misrepresentation in any written or oral disclosure made by or on behalf of the Company; breaches of the Company's policy on trading in securities; and other activities which may violate laws or the Company's Code of Ethical Conduct.
Please note that, unless you select otherwise, your comments will remain completely confidential and anonymous. Your comments and valuable feedback have a direct result to the success of Rand Logistics, Inc. and its subsidiaries.

If you have any questions, please feel free to contact me directly at any time.

Joe McHugh

Joseph W. McHugh, Jr. Chief Financial Officer Rand Logistics, Inc. c/o Lower Lakes Towing 517 Main Street PO Box 1149 Port Dover Ontario Canada N0A 1N0 519-583-0982 617-513-4243 (Cell)