



Human Trafficking Compliance Plan

Purpose

Weldmac Manufacturing Company is opposed to human trafficking and forced labor in any form. We are committed to working to mitigate the risk of human trafficking and forced labor in all aspects of our business. This Policy and Plan are consistent with Weldmac's Code of Ethics and Business Conduct and our core values to protect and advance human dignity and human rights in our business practices. This plan also complies with the requirements of Federal Acquisition Regulation 52.222-50.

Policy

As part of an overall effort to eradicate Human Trafficking in connection with the United States government Weldmac Manufacturing Company (Weldmac) has adopted a zero-tolerance policy regarding trafficking in persons. This policy reflects the zero-tolerance trafficking objectives as emphasized by the United States government and within Weldmac.

Weldmac does not and will not permit its employees, subcontractors, vendors, suppliers, or other entities doing business with Weldmac to engage in any form of Human Trafficking which includes, but is not limited to, the following trafficking-related activities;

- Engage in any form of trafficking including both commercial sex trafficking and coercive labor trafficking;
- Procuring commercial sex acts;
- Use of forced labor;
- Destroying, concealing, confiscating, or otherwise denying employees access to identity or immigration documents;
- Engaging in fraudulent or misleading recruitment practices;
- Employing recruiters who violate the labor laws of the country where the recruitment takes place;
- Charging applicants/candidates/employees recruitment fees;
- Where employees are recruited from another country, fail to provide return transportation or pay for the cost of return transportation upon the end of employment;
- Housing employees, if required in conditions that violate local law;
- Failing to provide an employment contract in writing if required.

Responsibility

We will be responsible for making our employees, subcontractors, vendors, suppliers and other entities doing business with Weldmac aware of our anti-trafficking policy and rules. Each employee, subcontractor, vendor, supplier and other entity doing business with Weldmac is responsible for ensuring compliance with this Policy.

Employees

Upon initial adoption all Weldmac personnel were notified and given a copy the Policy and the Compliance Plan. All employees are required to certify that they have read and understand the Policy and the Plan, and agree to comply with the policies and principles of the plan. Human Trafficking awareness will be part of our orientation upon hiring. Weldmac will also periodically conduct specialized training on the Policy and the Plan on an as-needed basis.

Subcontractors, Vendors, Suppliers or other entities doing business with Weldmac

The FAR clause is “flowed down” to our subcontractors, vendors, suppliers and other entities doing business with Weldmac as applicable and referenced in our purchase orders. Our management team will be trained to evaluate the risk of human trafficking and slavery and when Weldmac personnel go on site, if such evidence is discovered, personnel will report their findings to management, and/or government officials. Weldmac will mail a copy of our Policy and Compliance Plan to our subcontractors, vendors, suppliers and other entities doing business with Weldmac on an annual basis to remind them of their responsibilities to ensure continued compliance.

Disciplinary Action

Any violation of the Policy could result in disciplinary action, up to and including, termination in a business relationship, or termination of employment.

Reporting and Investigations

We all have an obligation under this policy to report Human Trafficking violations. Any suspected violation should be reported immediately to the HR Department or the National Human Trafficking Resource Center Hotline 1-888-373-7888. Employees may report, without fear of retaliation. Weldmac prohibits retaliation against any Weldmac employee who reports prohibited trafficking-related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports. Anyone reporting a violation of this policy will be afforded Whistle Blower Protection. All victims and witnesses will be protected. We are all expected to cooperate in an investigation of human trafficking-related offenses.

Recruitment and Wage Plan

Weldmac will not use a recruiter that does not comply with labor laws of the country in which the recruiting takes place. Weldmac prohibits charging recruitment fees to any employee.

Housing Plan

If a situation arrives where Weldmac provides housing to employees, the housing will meet host country housing and safety standards.

Posting

Weldmac will post this Plan on its external website www.weldmac.com and will also post this Plan at the workplace, except where the work is being performed in the field or not otherwise at a fixed location.

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