

Anti-Trafficking in Persons Policy and Compliance Plan

Hendrickson Holdings, L.L.C., including its subsidiaries, divisions, affiliates and related entities (the “Company”), expects its service providers and suppliers (each a “Vendor”) and their employees, agents and subcontractors (“Representatives”) to share and embrace the Company's desire to conduct business in full compliance with all applicable laws and with high ethical standards. The Company is opposed to human trafficking and forced labor in any form.

In an effort to address the crime of human trafficking, the United States Government (“Government”) has adopted a zero-tolerance policy prohibiting trafficking in persons and trafficking-related activities by any Government employees, contractor personnel and their agents. As a supplier/subcontractor to the Government, the Company and its Vendors and Representatives are required to comply with the Federal Acquisition Regulation 52.222-50, Combatting Trafficking in Persons.

Vendor and its Representatives shall not at any time:

- Engage in any form of trafficking in persons
- Procure commercial sex acts
- Use forced labor in performance of the contract
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language understood by the employee or potential employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee or potential employee, and if applicable, the hazardous nature of the work
- Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place
- Charge employees or potential employees recruitment fees
- Fail to provide return transportation or pay for the cost of return transportation upon the end of employment for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a Government contract, subcontract, or portions thereof performed outside the United States
- Fail to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who is not a United States national and who was brought into the United States for the purpose of working on a Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee for portions of contracts or subcontracts performed inside the United States
- Provide or arrange housing that fails to meet the applicable host country’s housing and safety standards
- If required by law or contract, fail to provide an employment contract, recruitment agreement, or any other required work document in writing in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five (5) days prior to the employee relocating. The employee’s work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

Any violations of this Policy by Vendor or its Representatives may result in disciplinary action which may include but is not limited to, Vendor’s and its Representatives’ removal from the contract and/or termination of the contract.

Additional information about Trafficking in Persons can be found at the website for the Department of State’s Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip>.

Vendors and its Representatives have a responsibility to report, without fear of retaliation, any trafficking in persons violations or activities that may violate this Policy, to their primary contact at the Company. Alternatively, suspected or actual violations of this policy may be reported to the Company through the Company’s Code of Conduct Hotline or to the Global Human Trafficking Hotline at 1-844-888-FREE or its email address at help@befree.org.

COUNTRY	HOTLINE NUMBER	COUNTRY ACCESS NUMBER
United States and Canada	866.630.7399	N/A
Australia	1.800.20.8932	N/A
Australia	1.800.14.1924	N/A
Austria	855.299.8603	0.800.200.288
China: North-Beijing CNGC	855.299.8603	108.888
China: North-Beijing CNGC (in Mandarin)	855.299.8603	108.710
China: South-Shanghai China Telecom	855.299.8603	108.11
China: South-Shanghai China Telecom (in Mandarin)	855.299.8603	108.10
France	0800.90.2418	N/A
Germany	855.299.8601	0.800.225.5288
India	855.299.8601	000.117
Mexico	001.800.613.2737	N/A
Romania	855.299.8601	0808.03.4288
United Kingdom	0808.234.7051	N/A
Poland	00.800.151.0316	N/A