



*Working to be a Globally Recognized Name for
Quality and Service
in the Automation & Controls Industry*

Combating Trafficking in Persons Policy & Compliance Plan

Hegwood Automation and Controls (Hegwood), does not tolerate forced or involuntary labor in any form. Further, as a supplier of goods and services to the US government, Hegwood has developed and maintains this compliance policy and plan for combating trafficking in persons in accordance with US Federal Acquisition Regulation 52.222-50 ("FAR 52.222-50"). This Plan is intended to address Hegwood's obligations in contracts and subcontracts for the supply of goods and/or services to the US government that incorporate FAR 52.222-50 and require a compliance plan ("Contracts").

Combating Trafficking in Persons Policy

The US government has adopted a policy, documented in FAR 52.222-50, prohibiting trafficking in persons including trafficking-related activities set forth below ("Policy"). Hegwood complies, and requires its employees, directors, officers, independent contractors and other individuals performing services on Hegwood's behalf (for ease of reference throughout this Plan referred to as "personnel") to comply, with the Policy.

Prohibited Conduct

Specifically, personnel shall not:

- (1) Engage in severe forms of trafficking in persons during the period of performance of any Contract;
- (2) Procure commercial sex acts during the period of performance of any Contract;
- (3) Use forced labor in the performance of any Contract;
- (4) Destroy, conceal, confiscate, or otherwise deny access by an employee who is directly engaged in the performance of work under a Contract and who has other than a minimal impact or involvement in the performance of a Contract ("Employee") to the Employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;

(5) (i) Use misleading or fraudulent practices during the recruitment of or offering of employment to Employees, such as failing to disclose basic information, in a format and language understood by the Employee or potential Employee, 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 provided or arranged by Hegwood or its agent), any significant costs to be charged to the Employee or potential Employee, and, if applicable, the hazardous nature of the work;

(ii) Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;

(6) Charge Employees or potential Employees recruitment fees;

(7) (i) Fail to provide return transportation or pay for the cost of return transportation upon the end of employment (A) 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 Contract (for portions of Contracts performed outside the United States); or (B) 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 Contract, 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 performed inside the United States); except that

(ii) Paragraph (7)(i) above shall not apply to an Employee who is: (A) legally permitted to remain in the country of employment and chooses to do so, or (B) exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation.

(iii) The requirements of paragraph (7)(i) of this clause are modified for a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons. Hegwood shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. For example, Hegwood shall not only offer return transportation to a witness at a time when the witness is still needed to testify. This paragraph does not apply when the exemptions in paragraph (7)(ii) of this clause apply.

(8) Provide or arrange housing that fails to meet the host country housing and safety standards;
or

(9) If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be 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 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.

Violations

Hegwood will take appropriate action, up to and including termination, against personnel that violate the Policy.

Reporting

All Employees are required to report any activity inconsistent with this Policy, with the assurance that there will be no retaliation or other negative consequences for persons acting in good faith. Any credible information received from any source that any Hegwood personnel has violated FAR 52.222-50 must be reported immediately to:

Donna Anglin
HR Manager
770-447-8853
donna@hegwoodcontrols.com

Alternatively, Employees may also report a violation by contacting one of the following hotlines:

- The hotline phone number of the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org.
- The Canadian Human Trafficking Hotline at 1-833-900-1010 and its email address hotline@ccteht.ca.
- The US National Human Trafficking Hotline at 1-888-373-7888 or text 233733.

Combating Trafficking in Persons Compliance Plan

Awareness

Hegwood will inform Employees about the Policy, including prohibited conduct, consequences of violations, and mechanisms to report suspected violations by posting relevant contents of this Plan, no later than the initiation of Contract performance, at its workplace, on its website, and/or on an internal Sharepoint site. Additional information about Trafficking in Persons and examples of awareness programs can be found at the website for the US Department of State's Office to Monitor and Combat Trafficking in Persons at <https://www.state.gov/bureaus-offices/under-secretary-for-civilian-security-democracy-and-human-rights/office-to-monitor-and-combat-trafficking-in-persons/>, and Public Safety Canada at <https://www.publicsafety.gc.ca/cnt/cntrng-crm/hmn-trffckng/index-en.aspx>. Hegwood will provide a copy of this Plan to an applicable contracting officer upon request.

Reporting

All Employees are required to report any activity inconsistent with this Policy, with the assurance that there will be no retaliation or other negative consequences for persons acting in good faith. Any credible information received from any source that any Hegwood personnel has violated FAR 52.222-50 must be reported immediately to Hegwood's HR Manager, or alternatively by contacting one of the following hotlines:

- The hotline phone number of the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org.
- The Canadian Human Trafficking Hotline at 1-833-900-1010 and its email address hotline@ccteht.ca.
- The US National Human Trafficking Hotline at 1-888-373-7888 or text 233733.

If the HR Manager anticipates that the event may require reporting under FAR 52.222-50, he or she shall immediately notify Hegwood's Owner and undertake steps to ensure Hegwood's compliance with its reporting obligations under FAR 52.222-50.

If a violation of FAR 52.222-50 is substantiated, the following actions shall be taken in consultation with the Owner:

- Violations by Hegwood employees: Hegwood's management, in conjunction with Human Resources, will ensure that the appropriate disciplinary action is taken up to and including dismissal or termination. The appropriate discipline depends on the nature of the violation and the circumstances surrounding the violation, among others.

- Violations by contractors or other third parties: Hegwood management will impose suitable remedies, up to and including termination, on subcontractors, agents, and external recruitment agencies who fail to comply with FAR 52.222-50.

Hegwood will inform Employees about the process to report activity inconsistent with the Policy as described in the “Awareness” section of this Plan.

Recruitment and Wage Plan

To the extent Hegwood uses recruitment companies, it will use only recruitment companies with trained employees; it will prohibit charging recruitment fees to the Employees or potential Employees; and, it will ensure that all wages meet applicable legal requirements.

Housing Plan

Whenever Hegwood will provide or arrange housing, Hegwood will ensure that the housing meets applicable housing and safety standards.

Supplier and Subcontractor Compliance

To the extent applicable, Hegwood will include the substance of FAR 52.222-50 in all subcontracts and in all contracts with agents. If any subcontractor is required by FAR 52.222-50 to submit a certification, Hegwood will require submission of the required certification prior to the award of the subcontract and annually thereafter.

Plan Assessments

Hegwood will periodically review and assess this Plan. Modifications will be implemented as required.