Anti – Human Trafficking Compliance Plan

Pacific Consolidated Industries, LLC ("PCI," "Company") is committed to prohibiting any form of human trafficking and similar conduct. This document describes the programs and processes established and implemented by PCI to comply with FAR 52.222-50, Combating Trafficking in Persons. The scope of the plan includes the operations and activities of the Company as well as those subcontractors and agents in its supply chain performing on this contract. This Plan is implemented and maintained by the PCI Human Resources department located at 12201 Magnolia Avenue, Riverside, CA 92503.

1. PCI Policy Against Human Trafficking and Similar Conduct

The Company strictly prohibits its employees, contractors, and agents from engaging in any form of human trafficking or similar conduct. The following conduct is specifically prohibited during the performance of Company business while on Company property or while otherwise performing work duties away from the Company's premises:

- Engaging in the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion for the purpose of subjecting that person to involuntary servitude, peonage, debt bondage or slavery.
- Engaging in sex trafficking, which means the recruitment, harboring, transportation, provision or obtaining of a person for the purpose of a commercial sex act, where the sex act is induced by force, fraud or coercion or involves a person under 18 years of age.
- Procuring commercial sex acts.
- Using forced labor.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents such as passports or drivers' licenses.
- Using misleading or fraudulent methods in recruiting or offering employment to persons, including making material misrepresentations regarding wages, benefits, location of the work, living conditions, housing, and associated costs (if provided by the Company or its agents), any costs to be charged to the employee and hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting occurs.
- Charging employees recruitment fees.
- Failing to provide return transportation or to pay the cost of return transportation for (a) an employee who is not a national of the country in which the work is performed and who was brought into that country to perform the work, or (b) for an employee who is not a U.S. national and who was brought into the U.S. to work on the contract or subcontract where the payment of such costs is required under a temporary worker program or an agreement with the employee. Payment of return travel costs is not required where the employee is legally permitted to remain in the country of employment and chooses to do so following the completion of work.
- Providing or arranging housing that fails to meet the host country's housing and safety standards.

- Where required by law, failing to provide an employment agreement to the employee. Such agreement must be in the language the employee understands and describe all pertinent details of the employment.

Employees, contractors, or agents of the Company who violate one or more of these prohibitions will be subject to disciplinary action, up to and including termination of employment, contract, or agency. Any Company employee, contractor or agent who becomes aware of any such violation shall report it immediately to Human Resources.

The complete PCI Code of Conduct Policy can be found on PCI's online HIRS system.

2. Employee Awareness Program

The Company has developed and implemented an awareness program to inform all employees about the FAR's prohibitions against trafficking-related activities described in FAR 52.222-50(b), the activities prohibited, and the actions that will be taken against the employee for violations. All employees are trained on:

- The Company Policy Against Human Trafficking and Similar Conduct and Code of Conduct Policy;
- consequences for violating Company Policy;
- the violation reporting process, and
- a summary of the U.S. Government's policy prohibiting trafficking related activities as contained.

3. Employee Reporting/Grievance Process

All employees of the Company or its suppliers, subcontractors and agents are encouraged to report any activity or condition that may violate the Company Policy Against Human Trafficking and Similar Conduct or the requirements of FAR 52.222-50 confidentially and without fear of retaliation, to **PCI Human Resources as follows:**

- In person at **the Human Resources Department**; or
- By telephone on our **Ethics Hotline Services at (877) 472-2110**; or
- By e-mail to the **Human Resources Department**.

The Company takes all reported concerns seriously and will not penalize or retaliate against individuals in any way for reporting unlawful activities or violations of the Company Policy Against Human Trafficking and Similar Conduct and FAR 52.222-50 in good faith. Furthermore, the Company has a zero-tolerance policy against any form of human trafficking and similar conduct.

All reported concerns will be investigated as promptly as possible by an impartial and qualified person and, upon conclusion of such investigation, appropriate corrective action will be taken where warranted. The Company prohibits employees from refusing to cooperate with internal investigations and the internal complaint procedure.

All reported concerns will be treated as confidentially as possible, consistent with the Company's need to conduct an adequate investigation.

The Company has also established a process to interview and protect from retaliation all employees suspected of being victims of or witnesses to alleged violations of the Company Policy Against Human Trafficking and Similar Conduct and FAR 52.222-50. This will be done prior to the employee returning to his or her country of origin if the employee is located outside their country of origin at the time of the incident being reported. Additionally, the Company will not interfere with employees cooperating fully with government authorities.

Employees may also report their concerns directly to:

- The Global Human Trafficking Hotline at **1-844-888-FREE (3733) or** its e-mail address **at help@befree.org;**
- The National Human Trafficking Hotline
    - In the U.S. at **1-888-373-7888** or by **texting HELP to 233733** (BEFREE)
    - Outside the U.S. at **+001-202-745-0190** or by **text 202-657-4006**
- The Company reporting process and e-mail address are available to all employees in the Employe Awareness Program and via postings in all worksites and the Company's on-line HRIS system accessible to all employees.

4. Recruitment and Wage Plan

The Company strictly prohibits misleading or fraudulent methods in recruiting or offering employment to persons, including making material misrepresentations regarding wages, benefits, location of the work, living conditions, housing, and associated costs (if provided by the Company or its agents), any costs to be charged to the employee and hazardous nature of the work.

All labor recruiters working for or with the Company and its suppliers and subcontractors must provide complete and accurate information to all employees regarding the work assignment they are being offered and train employees, prohibit charging recruitment fees to the employee and ensure that wages comply with local labor laws of the country in which the recruiting occurs or an explanation of any variance.

Any violations of FAR requirements could result in the Company terminating the contract of a subcontractor or agent. Additionally, the Company will report all identified violations of FAR 52.222-50 (b) and remedial action(s) taken, as well any credible information it receives from any source that alleges conduct in violation of FAR 52.222-50 (b) to the Contracting Officer.

5. Housing Plan

In situations where PCI and its contractors and its subcontractors provide or arrange housing for employees, the housing will at minimum meet host country housing and safety standards.

6. Supplier Compliance

PCI requires ALL contractors, consultants, vendors, subcontractors, and subrecipients ("**Suppliers**"), and their employees, consultants, interns, volunteers, and agents ("Supplier Personnel") to:

- Refrain from engaging in prohibited trafficking or trafficking related activity or similar conduct that violates PCI's Policy;
- Take steps to prevent trafficking or trafficking related activity or similar conduct by Supplier Personnel;
- Cooperate with all investigations of trafficking violations and provide truthful information to investigators.

Additional requirements apply to Suppliers with FAR-governed contracts and subcontracts that: (a) are for acquisition of supplies (other than commercially available off-the-shelf items) or performance of services outside the U.S., and (b) have an estimated value that exceeds $500,000. These Suppliers must maintain a written anti-trafficking compliance plan, and must submit pre-award, annual, and any other required certifications to PCI that:

- The Supplier has implemented a compliance plan and has complied with its plan; and
- After conducting due diligence, to the best of the Supplier's knowledge and belief, neither it nor any of its employees, or its contractors, consultants, suppliers, subcontractors, subrecipients or their employees, have engaged in any prohibited trafficking-related activities, or, if any abuses relating to prohibited trafficking-related activities have been found, Supplier has taken appropriate remedial and referral actions.

The Company will include appropriate language reflecting the applicable requirements in Supplier contracts, subcontracts, and subawards.

- If any Supplier fails to comply with applicable requirements, PCI will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:
- Requiring the Supplier to remove an employee or agent from a project;
- Requiring the Supplier to terminate its relationship with any Supplier contractor, consultant, supplier, subcontractor or subrecipient;
- Suspending payments to Supplier until violation is remedied;
- Immediately terminating the Supplier contract, subcontract, or award.

7. Violation Monitoring, Reporting and Remediation

The Company has established a performance monitoring, detection and remediation program to identify and address on an ongoing basis, any violations of the requirements of FAR 52.222-50 (b) and the Company Policy Against Human Trafficking and Similar Conduct.

In the event of the receipt of credible information alleging violations of FAR 2.222-50 (b), the Company will immediately:

- Notify the Contracting Officer and the agency Inspector General of the specific nature of the activity, including specific remedial actions taken, and
- Take appropriate corrective action, up to and including the dismissal of PCI employees and termination of contracts with subcontractors, suppliers and agents.

All subcontractors of PCI are required by contract to fully operate with PCI staff, contacting agencies and other Federal agencies to conduct audits and investigations on compliance with the provisions of FAR 52.222 (b), Combating Trafficking in Persons. Company subcontractors and agents must provide the Company with copies of their Compliance Plans prepared in accordance with PCI requirements and FAR 52.222-50(h).

The Company requires its subcontractors and agents whose subcontracts are covered by 52.222-50(i)(a) and (b) to certify prior to subcontract award and annually thereafter that they have implemented compliance plans that comply with 52.222-50 (h) and that, after having conducted due diligence, either (1) To the best of the subcontractor's knowledge and belief, neither it nor any of its agents, subcontractors, or their agents, has engaged in any such activities; or (2) If abuses relating to any of the prohibited activities identified in 52.222-50(b) have been found, the subcontractor has taken the appropriate remedial and referral actions.

Additionally, all subcontractors have agreed to on-going monitoring and random auditing by the Company or its agents for compliance with FAR 52.222-50 and the Company Policy Against Human Trafficking and Similar Conduct. Any credible indication of noncompliance will be investigated, reported and addressed accordingly.

Failure to comply with the requirements of FAR 52.222-50 is grounds for the Company to take any and all appropriate actions, up to and including immediate termination of that supplier's contract with PCI.

8. Annual Compliance Plan Certification

Annually after receiving an award, PCI will certify to the Government that:

- It has implemented a compliance plan to prevent any prohibited activities identified at paragraph (b) of the FAR clause 52.222-50 and to monitor, detect, and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities; and
- To the best of our knowledge and belief, based on ongoing compliance activities, neither the Company, nor any of its agents, subcontractors, or their agents, are engaged in prohibited trafficking-related activity as described in FAR 52.222-50 (b), or
- If there are any reported or if any credible information of abuses received from any source alleging conduct that violates FAR 52.222-50 (b), the Company will take immediate and appropriate remedial action(s) in response to the abuse(s), up to and including termination of the employee, subcontractor, subcontractor employee, or their agent involved.

A copy of the Compliance Plan is posted at the worksites for the Contract for which PCI and its subcontractors have active contract employees assigned. A copy is also posted on PCI website.

The Company's Human Trafficking Hotline Posters and Contractors Reprisal (Whistleblower Rights) Posters are also posted at Contract worksites in English and in the native languages of the employees.

If there are any identified non-compliance or credible evidence that alleges human trafficking-related activity, the Company will ensure that the pertinent details are provided to the Contracting Officer for possible imposition of remedies and to the agency.

STOP Human Trafficking

If you or someone you know is being forced to engage in any activity and cannot leave – whether it is commercial sex, housework, farm work, construction, factory, retail, or restaurant work, or any other activity –

text 233-733 (Be Free)

or call the National Human Trafficking Hotline at 1-888-373-7888 or the California Coalition to Abolish Slavery and Trafficking (CAST) at 1-888-KEY-2-FRE(EDOM) or 1-888-539-2373 to access help and services.

Victims of slavery and human trafficking are protected under United States and California law.

The hotlines are:

- Available 24 hours a day, 7 days a week
- Toll-free
- Operated by nonprofit, nongovernmental organizations
- Anonymous and confidential
- Accessible in more than 160 languages
- Able to provide help, referral to services, training, and general information