



**Policy: Human Trafficking and Slavery**

**Original Effective Date: March 7, 2017**

**Last Revision Date: March 7, 2017**

Engineered Materials Solutions (EMS) has a zero-tolerance policy prohibiting trafficking in persons and slavery. EMS employees, contractors, subcontractors, vendors, suppliers, partners and others through whom EMS conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs, any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants/candidates recruitment fees;
- Failing 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 U.S. Government contract or subcontract (for portions of contracts performed outside the United States), unless the employee is legally permitted to remain in the country of employment and chooses to do so, or if an appropriate agency has exempted this requirement;
- Failing 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 U.S. 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 performed inside the United States), unless the employee is legally permitted to remain in the country of employment and chooses to do so, or if an appropriate agency has exempted this requirement;



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- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing in a language the employee understands.

EMS does not and will not permit its employees, subcontractors, vendors, suppliers, or other entities doing business with EMS to engage in any form of human trafficking or the above activities.

EMS also prohibits retaliation against anyone who files a complaint or reports a suspected violation of this policy. An employee or other party who violates this policy will be subject to appropriate disciplinary action by EMS, including, but not limited to, disclosure of the violation to government officials when required by law or contract, termination of business relations, or termination of employment.

Any suspected violation should be reported immediately to EMS's Human Resources Office at 508-342-2196. EMS's Business Conduct/Code of Ethics Policy also upholds EMS's commitment to social responsibility and ethics.

*The content of this document is provided for informational purposes only and is not intended, and should not be construed, as legal advice or opinion. EMS reserves the right to alter or amend this policy at any time and without prior notification.*