



Quality Controlled Manufacturing, Inc.

Human Trafficking Compliance Plan

Purpose

Quality Controlled Manufacturing, Inc. ("QCMI") 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 QCMI's Code of Ethics 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, QCMI 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 QCMI.

QCMI does not and will not permit its employees, subcontractors, vendors, suppliers, or other entities doing business with QCMI 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 QCMI aware of our anti-trafficking policy and rules. Each employee, subcontractor, vendor, supplier and other entity doing business with QCMI is responsible for ensuring compliance within this Policy.

Employees

Upon initial adoption, all QCMI personnel were notified and given a copy of 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. QCMI will also periodically conduct specialized training on the Policy and the Plan as an as-needed basis.

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

The FAR clause is “flowed down” to our subcontractors, vendors, suppliers and other entities doing business with QCMI 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 QCMI personnel go on site, if such evidence is discovered, personnel will report their findings to management, and/or government officials. QCMI will mail a copy of our Policy and Compliance Plan to our subcontractors, vendors, suppliers and other entities doing business with QCMI 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 immediate to the HR Department or the National Human Trafficking Resource Center Hotline 1-888-373-7888. Employees may report, without fear of retaliation. QCMI prohibits retaliation against any QCMI 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

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

Housing Plan

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

Posting

QCMI will post this Plan on its external website www.qcmfginc.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.