

MacLean-Fogg Company Human Trafficking Policy

EFFECTIVE DATE: March 23, 2018

PURPOSE: The following policy describes MacLean-Fogg Company's commitment to prohibit all Company's officers, directors, employees, agents and third parties acting on MacLean-Fogg's behalf from engaging in human trafficking-related activities.

SCOPE: This policy applies to all MacLean-Fogg Company's officers, directors, employees, agents and third parties acting on MacLean-Fogg's behalf.

POLICY:

MacLean-Fogg strictly prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

MacLean-Fogg also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including:

- Destroying or otherwise denying access to an employee's identity or immigration documents;
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment;
- Using recruiters that do not comply with local labor laws;
- Charging employees recruitment fees;
- Failing to provide return transportation to certain employees who are brought to a country for purposes of working on a U.S. Government contract;
- Providing housing that fails to meet host country standards; and
- Failing to provide an employment contract or work document where required by law.

MacLean-Fogg operating companies will take appropriate disciplinary action for violations of these rules, up to and including discharge of employees, subcontractors, and agents.

MacLean-Fogg operating companies must cooperate fully with the U.S. Government or other appropriate governmental authorities in audits or investigations relating to such violations. Employees of MacLean-Fogg operating companies are required to cooperate in any internal or external investigation of suspected wrongdoing under this policy.

MANDATORY REPORTING REQUIREMENTS

In all countries where local laws and regulations permit, employees having knowledge of credible information concerning actual or potential violations of this policy must report them immediately in accordance with the MacLean-Fogg Whistleblower Non-Retaliation Policy. Timeliness of reporting any suspected violation is critical as the U.S. Government has imposed an especially stringent reporting obligation when there is credible information of violations.

Per the MacLean-Fogg Whistleblower Non-Retaliation Policy, employees may *report* concerns to their immediate supervisor, Local Human Resources Department, the Chief

Compliance Officer or any of the other contacts listed in the Company's Code of Business Conduct and Ethics (the "Code of Conduct"), including Internal Audit, Corporate Human Resources and the Compliance Department. When making a report, employees are encouraged to share as much information as possible so that appropriate action can be taken. Refer to the Appendix for contact information.

Any person who *receives* reports of possible violations under this policy must notify Corporate Compliance (i.e., CorporateCompliance@macleanfogg.com) immediately.

Failure to report actual or potential illegal behavior or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment.

WHISTLEBLOWER NON-RETALIATION POLICY

MacLean-Fogg Company does not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or governmental audit or investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, which could include termination of employment.

Appendix

EXHIBIT A- CONTACT INFORMATION

Chief Compliance Officer

Stephen Young (847) 837-3522

Corporate Human Resources

Kristin Malbasa 847- 837-3732

Tim White 847- 970-4639

Environmental Health & Safety

Abigail Ayers 847- 837- 3703

Ethics and Compliance Helpline

macleanfogg.com/ethicspoint

Australia 1-800-90-6792

Brazil 0800-892-0744

Canada 1-800-243-0140

China 4008427053

France 0800-90-2971

Germany 0-800-225-5288

India 000-117

Japan 0034-800-600301

00531-11-0457

0066-33-830688

Korea 00308-13-3074

Malaysia 1-800-81-8368

New Zealand 000-911

Taiwan 00-801-102-880

Thailand 1800-011-585

United States 1-800-243-0140