

MW INDUSTRIES, INC. POLICY REGARDING HUMAN TRAFFICKING AND SLAVERY

MW Industries, Inc. ("the Company" or "MW Industries") strictly prohibits their employees, contractors and agents from engaging in any form of human trafficking or slavery. Modern slavery can take various forms to include slavery, servitude, forced and compulsory labor, and human trafficking. This policy specifically prohibits, but is not limited to, the following conduct:

- 1. 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.
- 2. 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.
- 3. Procuring commercial sex acts.
- 4. Using forced labor.
- 5. Destroying, concealing, confiscating or otherwise denying access by an employee to the employee's identity or immigration documents such as passports or drivers' licenses.
- 6. 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.
- 7. Using recruiters that do not comply with local labor laws of the country in which the recruiting occurs.
- 8. Charging employees recruitment fees.
- 9. 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.
- 10. Providing or arranging housing that fails to meet the host country's housing and safety standards.
- 11. 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 the Company's Human Resources Department.

Rick Szkorla

Director, Human Resources MW Components

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