



## Policy Against Human Trafficking & Slavery

Ultra Tool is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes all forms of forced labor and unlawful child labor. Ultra Tool will not tolerate or condone human trafficking or slavery in any part of our organization.

Ultra Tool has a zero-tolerance approach to human trafficking and slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure human trafficking and slavery are not taking place anywhere in our business or those of our suppliers.

This policy applies to all personnel employed by or engaged to provide services to Ultra Tool, including, but not limited to, employees, officers, and temporary employees of Ultra Tool, along with Ultra Tool's agents, independent contractors and subcontractors when acting within the scope of their employment or contract with Ultra Tool.

Federal and state laws prohibit trafficking in persons and slavery. "Trafficking" means recruiting, enticing, harboring, transporting, providing or obtaining, or attempting to recruit, entice, harbor, transport, provide or obtain. These laws prohibit anyone, including employers and government contractors and their employees, subcontractors, subcontractor employees, and agents from engaging in any practice that constitutes trafficking in persons or slavery.

Ultra Tool will not tolerate and will not condone the use of slavery, forced, involuntary or coerced labor, child labor, human trafficking or sex trafficking by any employee, agent, subcontractor or supplier in the operation or support of our business or the manufacture and distribution of our products. Ultra Tool strives to identify any high-risk areas within its operations and supply chains. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Knowingly using any form of forced or involuntary labor in the performance of any work, including the use of (i) threats of serious harm to, or physical restraint of, a person; (ii) any scheme plan, or pattern intended to cause a person to believe that, if the person did not perform such labor or services, that the person or another person would suffer serious harm or physical restraint; or (iii) any abuse or threatened abuse of law or the legal process.
- Engaging in or supporting the use of child labor.
- Destroying, concealing, confiscating, withholding or otherwise denying access to an employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, basic information; or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing, and associated costs (if provided by Ultra Tool or its agents), any significant cost to be charged to the employee or applicant, 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 recruitment fees.
- Preventing workers the freedom to terminate labor contracts without financial penalty, subject to providing reasonable notice.
- If required by law or contract, failing to provide return transportation, or failing to pay for the cost of return transportation upon the end of employment for workers brought to the U.S. for the purpose of working for Ultra Tool.
- If required by law or contract, failing to provide or arrange housing that meets the host country housing, sanitation, and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.
- If required by law or contract, failing to provide wages which meet applicable home country legal requirements, or the prevailing sector wage if no legal minimum wage exists.

In addition, we will verify workers' ages to confirm they are allowed to work, and to ensure that we don't take part in the exploitation of children. If we hire anyone younger than the age of 18, we're committed to following applicable state and federal law. We want to grow and thrive as a business, but we're also committed to do good by the community we belong in. We ask all of our employees and partners to follow this policy, not just because we demand it as an organization, but because securing a bright future for children is everyone's duty.

Every employee is responsible for reading, understanding, and complying with this policy. Ultra Tool managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy. If you have any questions or concerns relating to this policy, consult the Ultra Tool Human Resources department. Ultra Tool will periodically assess internal awareness of, and compliance with this policy.

Any Ultra Tool employee that is aware of or witnesses a violation of this policy or is uncertain about how to handle any matters addressed in this policy, is encouraged to immediately contact his or her supervisor and to the Human Resources department. If the issue is not resolved or the employee is not comfortable raising the issue with his or her supervisor, the employee should contact Human Resources or another member of management. In addition, employees may contact the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org). Additional information about trafficking in persons can be found at the website for the Department of State's Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip/>.

We will investigate allegations of misconduct and take appropriate steps, including corrective action, when allegations are substantiated. We will also cooperate fully with the U.S. Government and other appropriate governmental authorities in audits or investigations relating to violations of this policy. Employees are required to cooperate in any internal or external investigation of suspected violations of this policy.

Ultra Tool has a zero-tolerance approach regarding any of its employees, agents, subcontractors or suppliers who engage in or support the use of slavery, forced, involuntary or coerced labor, child labor, human trafficking or sex trafficking. Failure to comply with this policy will result in



disciplinary action up to or including termination of employment. 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.

If a subcontractor or supplier is found in violation of this policy, Ultra Tool will take prompt, remedial measures to address the violation, up to and including termination of the supplier or subcontractor. Referral to proper authorities may be taken in cases involving breaches of certain criminal laws.

Ultra Tool does not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or external audit or investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, including possible termination.

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