

## **RTC AEROSPACE HUMAN TRAFFICKING POLICY**

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JANUARY 1, 2016

TO: EMPLOYEES, SUBCONTRACTORS, AND AGENTS

FROM: JASON DARLEY, PRESIDENT & CEO

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RTC Aerospace 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. This policy is intended to assist in complying with SUBPART 222.17—Combating Trafficking In Person Procedures and to establish procedures and provide information necessary to educate employees in the recognition and prevention of Human Trafficking.

RTC Aerospace 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 the purpose 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.

RTC Aerospace will take appropriate disciplinary action for violations of these rules, up to and including discharge of employees, subcontractors, and agents.

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

### **Mandatory Reporting Requirements**

Employees having knowledge of credible information concerning actual or potential violations of this policy must report them immediately in accordance with the RTC Aerospace Procedure. 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. 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.

RTC Aerospace has many channels available to receive reports of possible violations of policy. However, given the immediacy of our notification requirements to the U.S. Government, possible violations of this policy should be reported directly to the HR Department, in accordance with the RTC Aerospace Procedure. When making a report, employees are encouraged to share as much information as possible so that appropriate action can be taken.

In addition to the reporting requirements described above, it is possible for RTC Aerospace employees to report activity inconsistent with this policy to a third-party hotline. Such reporting does not satisfy an employee's obligation to report to RTC Aerospace credible information concerning actual or potential violations of this policy immediately, in accordance with the RTC Aerospace Procedure.

## Non-Retaliation Policy

RTC Aerospace 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.