



Approved: Josh Wilber

Date: 8/13/2014

122 Anti Forced Labor and Human Trafficking Policy

Effective Date: 8/13/2014

Grote Industries is committed to a work environment that is free from human trafficking, forced labor and unlawful child labor (“human trafficking and slavery”). We strongly believe that we are responsible for promoting ethical and lawful employment practices. These practices are also required to be followed by our suppliers, subcontractors or business partners (collectively referred to as “Suppliers”) worldwide.

This policy covers all employees of Grote Industries worldwide and all of its Suppliers. In the event anything in this policy conflicts with local law, local law will control the interpretation and application of this policy.

Grote Industries will not tolerate the use of unlawful child labor or forced labor in the manufacture of products it sells and will not accept products or services from Suppliers that employ or utilize child labor or forced labor in any manner. Human trafficking and slavery are crimes under state, federal and international law. These crimes exist in countries throughout the world. This Policy is to define how Grote Industries will make efforts to eradicate human trafficking and slavery from not only within its organization but also from our supply chains.

Grote Industries expects Suppliers:

- 1) Will not use forced or compulsory labor, i.e. any work or service that a worker performs involuntarily, under threat of penalty;
- 2) Will ensure that the overall terms of employment are voluntary;
- 3) Will comply with the minimum age requirements prescribed by applicable laws unless a specific contract contains stricter age requirements;
- 4) Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- 5) Will abide by applicable law concerning the maximum hours of daily labor.

Suppliers must be able to certify that materials incorporated into the products they provide complies with the laws regarding human trafficking and slavery of the county or countries in which they are doing business. Suppliers must also be able to demonstrate compliance with this Policy at the request and satisfaction of Grote Industries. Grote Industries may perform periodic audits on this Policy.

Any Supplier who engages in human trafficking, unlawful child labor, and slavery will have their supply agreements terminated.

To help with understanding of terms utilized within this Policy, the following terms are defined:

- 1) Human Trafficking: the recruitment, transportation, transfer, harboring or receipt of persons, by

means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

- 2) Forced Labor: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
- 3) Unlawful Child Labor: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

This policy is governed by the Company Policies and Guidelines disclaimer statement.