



1501 S. McLean Blvd.  
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## **Combating Trafficking in Persons Compliance Plan**

Harlow Aerostructures LLC, including its subsidiaries NC Dynamics LLC and Valley Tool and Manufacturing LLC ("Harlow" or "Company") is opposed to human trafficking in any form. Harlow is committed to mitigating the risk of human trafficking in all aspects of its business. The U.S. Government prohibits all forms of human trafficking by government employees, contractors, and their agents, including the types of human trafficking described below.

Harlow is a federal contractor with government contracts that are subject to the federal regulations for Combating Trafficking in Persons, which are found at Federal Acquisition Regulation ("FAR") 52.222-50. Among other things, this regulation requires Harlow to establish this Combating Trafficking in Persons Compliance Plan ("Plan"), which applies to officers, employees, agents, and subcontractors and their employees, of Harlow and its subsidiaries and joint ventures who perform work under a federal contract subject to FAR 52.222-50. Harlow's Plan complies with FAR 52.222-50, based on the size, complexity, nature, and scope of its covered government contracts, and is consistent with the Company's Ethics/Code of Conduct Policy for all its employees and agents.

This Plan is maintained by the Corporate Human Resources Office located at 1501 S. McLean Blvd., Wichita, KS 67213. Copies of the Plan are posted in Harlow's workplaces and on its website.

### **Employee Awareness Program**

Consistent with prohibitions prescribed by the federal government, Harlow prohibits its officers, employees, agents, and subcontractors from engaging in any form of human trafficking. Human trafficking specifically including any of these activities:

- Engaging in severe forms of trafficking in persons, meaning (1) sex trafficking in which a commercial sex act—any act of sex in exchange for anything of value—is induced by force, fraud, or coercion or is performed with a minor; or (2) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion;
- Procuring commercial sex acts;
- Engaging in child labor;
- Using forced labor;
- Destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents, such as passports or drivers' licenses;
- Using misleading or fraudulent practices in employee recruitment or job offers, such as failing to disclose in a format and language accessible to the employee or misrepresenting basic information 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 or arranged by the employer or its), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws where the recruiting takes place;
- Charging employees recruitment fees;

- For employees whom the employer or its agent brought into the U.S. or another country for the purpose of working on a covered government contract, failing to pay the employees' return transportation costs upon the end of employment (with some exceptions and timing requirements, *see* FAR 52.222-50(b)(7));
- Providing or arranging housing that fails to meet the host country's housing and safety standards; and
- Where required by law or contract, failing to provide—at least five days prior to an employee's relocation, when relocation is required—a written employment contract, recruitment agreement, or other legally required work document in a language the employee understands, describing the terms and conditions of employment (including the nature of the work, work location, wages, round-trip transportation and living arrangements, time off, grievance process, and the content of anti-trafficking laws, including the prohibition on charging fees).

As part of its Employee Awareness Program, Harlow makes this Plan available to all employees via postings in its facilities and its website. This Plan informs employees about the government's prohibition on human trafficking, identifies types of prohibited trafficking activities, and the consequences for participating in a prohibited act. Harlow also trains employees on these matters and directs employees who want further information about human trafficking issues to visit the website of the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons (<https://www.state.gov/j/tip/>).

### **Violation Reporting Process & Corrective Actions**

All officers, employees, agents, and subcontractors are encouraged to report any activity or condition that might violate this Plan or the requirements of FAR 52.222-50 to the Company's Human Resources Department in person or by e-mail at [HR@harlowair.com](mailto:HR@harlowair.com). The Company will fully investigate each report and, to the extent required by law, notify the appropriate government officials about the alleged violations and any corrective actions. Employees also may report their concerns directly to the Global Human Trafficking Hotline by phone (**1.844.888.FREE**) or email ([help@befree.org](mailto:help@befree.org)). Harlow will not discriminate or retaliate in any way against persons who make such reports or participate as a witness or otherwise in an investigation.

Harlow will take appropriate corrective action against any person found to violate this Plan or the accompanying government regulations. These actions may include, for example, removal from the contract, reduction in benefits, or termination of employment.

### **Recruitment and Wage Plan**

Harlow only allows the use of recruitment companies with trained employees and forbids any officer, employee, agent, or other recruiter from charging employees a recruitment fee. Harlow also ensures that employee wages meet applicable legal requirements for the work location.

### **Housing Plan**

Harlow does not intend to provide or arrange housing for employees. Prior to any such housing arrangement, Harlow will ensure that the housing meets host-country housing and safety standards.

### **Prevention, Monitoring, Detection, and Remediation Plan**

To prevent, monitor, detect, and remedy any violations of this Plan or the requirements of FAR 52.222-50(b), Harlow: informs and trains officers, employees, and agents about its prohibitions on human trafficking and this Plan; encourages the reporting of all violations and does not retaliate against those who make or investigate such reports; takes corrective action to remedy any violations; notifies the appropriate government officials of any credible alleged violations and any corrective actions, to the extent required by law; fully cooperates with government investigations; and passes these requirements to its subcontractors and agents by including them in covered subcontracts; and requires such subcontractors and agents to submit a certificate of compliance before awarding any subcontract and annually thereafter.