

HUMAN TRAFFICKING & SLAVERY POLICY

I. Purpose

RCD Components (dba Gowanda RCD, LLC) 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 also complies with the California Transparency in Supply Chains Act.

II. Scope

This policy covers all employees of Gowanda RCD, LLC and all of its subsidiaries (collectively referred to as “RCD”) and all of its Suppliers.

In the event anything in this policy may conflict with local law, local law will control the interpretation and application of this policy.

III. Definitions

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.

Forced Labor: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful 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.

IV. Rationale

RCD 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 RCD will make efforts to eradicate human trafficking and slavery from not only within its organization but also from our supply chains

V. Requirements

Suppliers:

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

VI. Certification

Suppliers will certify that materials incorporated into the products they provide complies with the laws regarding human trafficking and slavery of the countries in which they are doing business.

VII. Audits

Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of RCD. RCD may perform periodic random audits on this Policy.

VIII. Consequences

Suppliers who engage in human trafficking and slavery will have their supply agreements terminated. If a Supplier to RCD is found in violation of this policy, RCD will take prompt, remedial measures to address the violation and contact the appropriate authorities.