



## **Policy Against Forced Labor and Human Trafficking**

LMI Aerospace, Inc. (“LMI” or the “Company”) is committed to ensuring that its suppliers do not use Forced Labor or engage in Human Trafficking. LMI’s Code of Ethics and Business Conduct establishes that working conditions are safe, workers are treated with respect and dignity as understood by the international community, and business operations are environmentally responsible and conducted ethically. Both LMI and its suppliers are expected to honor this commitment. This Policy forms a part of LMI’s purchase order, unless otherwise specified.

**“Forced Labor”** means coerced labor, involuntary servitude, peonage or indentured labor, involuntary prison labor, slavery, human trafficking or sex trafficking, including but not limited to transporting, harboring, recruiting, or transferring persons by means of threat (including but not limited to threat of harm or physical restraints, or threat of abuse of legal process), force, coercion, abduction or fraud.

LMI expressly prohibits suppliers from using, engaging in or facilitating Forced Labor of any kind. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. Suppliers unwilling to meet these requirements may be ineligible for LMI approved supplier status.

Supply Chain management and other LMI executives and employees receive training on LMI’s Code of Ethics and Business Conduct and this Policy.

LMI’s approved suppliers, both public and private, are required to conduct due diligence on the presence of Forced Labor in their supply chain and to comply with this Policy.

### **Suppliers shall:**

- Comply with applicable US and international laws prohibiting Forced Labor.
- Uphold the human rights of workers and treat them with dignity and respect.
- Ensure that all work is voluntary and workers are free to terminate their employment.
- Disclose to workers all terms and conditions of employment, and any hazardous nature of work, location of work, living conditions, housing and costs (if employer or agent provided or arranged), time off, round-trip transportation arrangements, grievance process, and provide information about applicable laws and regulations prohibiting Forced Labor.
- Ensure that workers are not required to pay any recruitment fees or other fees for their employment.
- Employ workers on the basis of their ability to do the job.
- Ensure all workers meet the applicable minimum legal age requirement.
- Set work hours, wages and over-time pay in compliance with all applicable laws.
- Provide or arrange housing that meets or exceeds host country housing and safety standards.
- Pay workers at least the minimum legal wage or a wage that meets local industry standards, whichever is greater, and comply with legally mandated benefits.
- Respect employees’ right to join or not join any trade unions and works councils, and comply with all applicable freedom of association and collective bargaining laws.
- Ensure workers are aware of Forced Labor prohibitions and the actions that will be taken against the employees for violations, including posting relevant information on the Supplier’s web-site, at work places, and, when such posting are impracticable, provide such information to workers in writing.
- Discipline workers and suppliers who use or facilitate Forced Labor.
- Provide workers an opportunity to report suspected violations without a fear of retaliation.
- Make available to all workers the Global Human Trafficking Hotline number 1-844-888-FREE and its email address at [help@befree.org](mailto:help@befree.org)

**Suppliers shall not:**

- Unreasonably restrict workers' freedom of movement in the company facilities.
- Hold or otherwise destroy, conceal, confiscate or deny access by workers to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.
- Use recruiters or staffing agencies that do not comply with applicable labor laws, or charge workers any recruitment fees.
- Engage in or permit corporal punishment, threats of violence, mental or physical coercion, verbal abuse of workers or other forms of harassment whether based on gender, race, color, religion, ethnicity, age, sexual orientation, national origin, disability, or any other legally protected characteristic.
- Use child labor. A "child" means any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country or locations, whichever is greatest.
- Discriminate on the basis of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy or maternity, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status.

**Due Diligence**

LMI has developed an approach driven by laws and regulations that prohibit Forced Labor and by LMI customers' expectations. In addition, LMI vets suppliers and sub-contractors that are part of the US government supply chain.

**Compliance Monitoring**

LMI reserves the right to audit supplier's compliance with this Policy. The supplier will allow LMI or any of its representatives or agents access to its facilities and all relevant records. The supplier will accommodate LMI's requests to access the supplier's records and facilities when LMI's business requires immediate access to the same. Supplier also agrees to cooperate with LMI to investigate any Forced Labor allegations against LMI or any of LMI's customers.

**Application to Sub-Contractors**

LMI extends this Policy reach to suppliers and their contractors to mitigate Forced Labor issues. Hence, this Policy also applies to the supplier's sub-contractor(s). This Policy shall be flowed down to all sub-tier subcontractors, including staffing agencies and other providers of contract labor. The supplier is fully responsible for ensuring compliance by any such sub-contractor(s) as if they were the supplier itself.

**Violations and Investigations**

LMI will investigate claims or indications that a supplier is engaging in Forced Labor, or is otherwise not complying with this Policy. LMI may hold suppliers responsible for reasonable costs of investigating non-compliance. LMI will not continue to purchase goods or services from any supplier that is found to be engaging in Forced Labor.

**Annual Certification**

LMI may mandate suppliers' adherence to this Policy in writing.

**Hotline**

Forced Labor issues and concerns should be reported to LMI by calling LMI's Ethics Hotline at 1-844-801-3786.