



## Anti-Trafficking and Forced Labor Compliance Plan

Precision Castparts Corp., including each PCC subsidiary company, ("PCC") is committed to compliance with all laws and ensuring the safety and proper treatment of all employees, suppliers, contractors, agents and consultants. This commitment is explained in the PCC Code of Conduct available on the PCC Portal [here](#) and externally at:

[http://www.precast.com/web/user\\_content/files/code\\_of\\_conduct\\_-\\_english.pdf](http://www.precast.com/web/user_content/files/code_of_conduct_-_english.pdf). Training on the Code of Conduct is provided and audits are conducted annually.

Further to that commitment and as a subcontractor subject to the U.S. Government's Federal Acquisition Regulations ("FAR"), PCC undertakes the following efforts targeted at ensuring compliance with anti-trafficking and forced labor laws in the United States, Europe and at all facilities and sites located around the world:

- (1) PCC informs all employees and contractors about the U.S. Government's and other applicable national or local government's policies prohibiting trafficking-related activities, the activities that are prohibited and the actions that will be taken against the employee or contractor for violations of such prohibitions. Additional information about Trafficking in Persons and forced labor and examples of awareness programs can be found at the website for the Department of State's Office to Monitor and Combat Trafficking in Persons at: <http://www.state.gov/j/tip/>, and at other national and local government or information websites.
- (2) Employees and contractors at all PCC facilities are invited and expected to report, without fear of retaliation, any activity inconsistent with the policy prohibiting trafficking in persons and forced labor, through PCC's ethics hotline, available at <http://www.ethicspoint.com/>. Posters and information about this hotline (including local hotline telephone numbers) are prominently posted at all PCC Company sites. In the U.S. and Canada, the hotline telephone number is 1-800-261-8651.

Employees may also address any concerns to the U.S. Government's Global Human Trafficking Hotline at 1-844-888-FREE or via email at [help@befree.org](mailto:help@befree.org), or any other national or local hotline or help desk offered by other government bodies.

Reports are also welcomed by local operational management, any Human Resources ("HR") representative and the PCC Legal Department.

- (3) PCC has HR policies and procedures in place to ensure that PCC and PCC companies use only recruitment companies with trained employees who operate consistent with PCC's Code of Conduct.

In addition, PCC prohibits charging employer recruitment fees to the employee and ensures that wages and benefits meet applicable host-country legal requirements.

HR will also ensure that any contractor or subcontractor engaged by PCC or a PCC Company directly who needs temporary housing to complete a job will be provided a safe and secure place to live.

Please contact your local HR representative if you have any questions or concerns.

- (4) PCC prohibits agents and subcontractors at any tier and at any monetary value from engaging in trafficking in persons and forced labor. This requirement is expressly included in representative and agent agreements and explained in PCC's Integrity Guide, published at:  
[http://www.precastcorp.com/web/user\\_content/files/pcc\\_supplier\\_integrity\\_guide.pdf](http://www.precastcorp.com/web/user_content/files/pcc_supplier_integrity_guide.pdf).
- (5) PCC monitors its agents and subcontractors to ensure that they are complying with the PCC Code of Conduct and acting in the company's best interests while the agent or subcontractor is working on PCC's behalf. Any agent or subcontractor that does not comply with the terms of their agreement with PCC or a PCC Company, including participation in human trafficking or forced labor, will be immediately terminated for cause.
- (6) PCC will review any reports or witnessed examples of trafficking or forced labor and will report identified violations to the prime contractor on any U.S. government contract in accordance with its obligations under that subcontract, the relevant FAR and U.S. Executive Order 13627, and as otherwise required by any other national or local law.
- (7) PCC has published a statement confirming this commitment on its website at:  
[http://www.precastcorp.com/web/user\\_content/files/slavery\\_and\\_human\\_trafficking\\_statement\\_for\\_the\\_financial\\_year\\_2015-2016.pdf](http://www.precastcorp.com/web/user_content/files/slavery_and_human_trafficking_statement_for_the_financial_year_2015-2016.pdf).

PCC expects its employees and representatives to "think before we act." Ensuring our reputation as a company committed to ethics and integrity is only possible with the conscientious actions of all who work for and on behalf of PCC.