



MBP

POLICY PROHIBITING HUMAN TRAFFICKING

April 2025

MBP'S POLICY PROHIBITING HUMAN TRAFFICKING

McDonough Bolyard Peck, Inc. (“MBP” or “Company”) operates with honesty, integrity, dignity, and respect, complying with all laws and regulations. MBP has a zero-tolerance policy and prohibits illegal child labor, forced labor, coercion, fraud, and exploitation. The Company upholds international human rights principles, such as the United Nations Declaration of Human Rights, the Trafficking Victims Protection Act, the United Kingdom Modern Slavery Act, and the California Supply Chain Transparency Act.

MBP adheres to local labor laws and expects its business partners to do the same. For this reason, MBP adopted a Code of Business Ethics and Compliance for Subcontractors and Suppliers (“Subcontractor Code”) for our vendors, subcontractors, and service providers. MBP’s Policy Prohibiting Human Trafficking (“Policy”) outlines MBP’s commitments and sets standards for our stakeholders and partners.



PROHIBITIONS

Certain actions are strictly prohibited for MBP employees and external parties, including subcontractors, suppliers, and agents. Following is a non-inclusive list:

- Engaging in or using any forms of human trafficking and forced labor.
- Withholding, destroying, concealing, or denying employees access to their identity or immigration documents.
- Using recruiters that do not comply with the labor laws of the country where the recruiting occurs.
- Charging employees recruitment fees.
- Requiring deposits from employees unless required by applicable law.
- Restricting freedom of movement or right to terminate employment.
- Granting loans to workers that may be construed as debt bondage or forced labor.
- Enforcing disciplinary measures for declining overtime that exceeds the limits established, mandated, or allowed under a binding and enforceable collective bargaining agreement.
- Setting production quotas so high that employees must work extra hours to earn the minimum or industry wage.
- Having access to employees' bank accounts for purposes other than making direct deposits of their compensation.
- Procuring commercial sex acts.
- Not paying legally required or industry-standard wages.

QUALIFICATION

MBP has a supplier qualification process to identify, assess, and manage supplier risks. MBP asks suppliers to accept and comply with this Policy when appropriate.

AUDITING

MBP may audit subcontractors and suppliers to confirm adherence to contractual requirements and this Policy.



CERTIFICATION

MBP requires subcontractors and suppliers to adhere to MBP's Subcontractor Code, policies, and all applicable laws. Subcontractors and suppliers must also ensure their own subcontractors and suppliers comply at the same level, in writing. MBP does not obtain third-party auditor certifications.

ACCOUNTABILITY

Everyone in MBP's business community, whether employees, subcontractors, or suppliers, must conduct business ethically. Employees must follow host country laws, Company policies, and the Code of Business Ethics and Conduct. Violations can lead to disciplinary actions, including termination. Subcontractors and suppliers must adhere to host country laws, purchase orders or subcontracts, and the Subcontractor Code. Non-compliance may lead to termination.

MBP's policies may be stricter than laws; in that case, compliance with MBP's requirements is mandatory. For clarification, contact Julie Coolbaugh, MBP's Compliance Officer, at jcoolbaugh@mbpce.com or 703-969-3480.

RECRUITMENT FEES

MBP and its employees and agents will not charge recruitment fees or use deceptive hiring practices. Recruitment fees include costs imposed on employees or candidates during the recruiting process for:

- Soliciting, identifying, considering, interviewing, referring, retaining, transferring, selecting, testing, training, providing new-hire orientation, recommending, or placing employees or job candidates.
- Advertising expenses.
- Activities related to obtaining permanent or temporary labor certification.
- Processing petitions.
- Visa costs, including appointment and application fees.
- Government fees, such as border crossing charges.
- Fees for photographs, identity documentation, medical exams, immunizations, and background checks required for job access.



- Additional certifications.
- Recruiters, agents, attorneys, or notary/legal fees of the employer.
- Language interpreters or translators.

A recruitment fee can be any financial obligation, whether paid in money or property, deducted from wages, repaid through wages or benefits, given as a kickback, bribe, in-kind payment, free labor, tip, or tribute.

REPORTING

MBP employees, agents, suppliers, and subcontractors must report any known or suspected violations of the policies. They may report these in good faith without fear of retaliation to the Compliance Officer or the HOTLINE:

- MBP's Compliance Officer: Julie Coolbaugh, Senior VP, Human Resources
 - Phone: 703-969-3480
 - Email: jcoolbaugh@mbpce.com
- MBP's Anonymous Ethics HOTLINE: 1-833-274-5059 or <https://faceup.com/c/Ofb84yzx>
- Global Human Trafficking Hotline: 1-844-888-FREE or email at help@befree.org

MBP strictly prohibits retaliation against any individual who, in good faith, reports a concern regarding suspected illegal or unethical conduct or who honestly participates in investigation efforts. Any form of retaliation is a breach of MBP's Code of Conduct, policies, and applicable laws and may result in disciplinary measures, including termination of employment.

TRAINING AND AWARENESS

MBP trains employees annually on ethical standards, policies, procedures, legal requirements, and human trafficking prevention. Through its Subcontractor Code, MBP also affirms these expectations to subcontractors and suppliers.

DISCLOSURE AND COOPERATION

MBP is obligated to inform the U.S. Government if it receives credible evidence or becomes aware of employees violating the human trafficking and inhumane living conditions provisions stated herein. MBP will cooperate with the U.S. Government during their investigative efforts.

