

<i>EAST PENN manufacturing co., inc.</i>			
EAST PENN POLICIES AND PROCEDURES MANUAL			
Revision No.: 1	Effective Date: 4/4/2016	Page 1 of 2	Change # 3033
Approved By: Robert D. Harrop	Document No.: EPPM\PERS\SEC1\ 33A.DOC		

Prohibition of Human Trafficking

East Penn Mfg, Inc., as well as its subsidiaries, (“EPM”) has a zero-tolerance policy prohibiting trafficking in persons. This includes, but is not limited to, the following trafficking-related activities:

- Engaging in any form of trafficking in persons in the performance of any work;
- Procuring commercial sex acts in the performance of any work;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates/employees or offering of employment;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants/candidates/employees recruitment fees;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (for portions of contracts performed outside the United States), unless the employee is legally permitted to remain in the country of employment and chooses to do so, or if an appropriate agency has exempted this requirement;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who is not a United States national and who was brought into the United States for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the United States), unless the employee is legally permitted to remain in the country of employment and chooses to do so, or if an appropriate agency has exempted this requirement;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or contracts, failing to provide an employment contract, recruitment agreement, or other required work document in writing and in a language the employee understands.

EPM does not and will not permit its employees, subcontractors, vendors, suppliers, or other entities doing business with EPM to engage in any form of human trafficking and the above activities.

EPM prohibits retaliation against anyone who files a complaint or reports a suspected violation of this policy. An employee or other party who violates this policy will be subject to appropriate discipline by EPM, including, but not limited to, disclosure of the violation to government officials, when required by law or contract, and/or termination.

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Reporting

Employees may report, without fear of retaliation, activity inconsistent with this policy prohibiting human trafficking by calling East Penn Mfg's Helpline at 610-641-2049 or the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org.

Record of Revisions

Revision #	Revision Date	Description
1	4/4/2016	Document #3033 New Policy