NORDAM PROPRIETARY & COMPANY CONFIDENTIAL INFORMATION
ACCESS AND USE SUBJECT TO NORDAM’S FULL WARNING AND RESTRICTION BELOW
© COPYRIGHT THE NORDAM GROUP, INC. 2015 ALL RIGHTS RESERVED

WARNING: NO TECHNICAL DATA MAY BE EXPORTED OR RE-EXPORTED TO, OR TRANSSHIPPED THROUGH, ANY COUNTRY OR DISCLOSED TO ANY PERSON EXCEPT IN COMPLIANCE WITH THE U.S. INTERNATIONAL TRAFFIC IN ARMS REGULATIONS (“ITAR”), THE U.S. EXPORT ADMINISTRATION REGULATIONS (“EAR”), THE REGULATIONS OF U.S. OFFICE OF FOREIGN ASSETS CONTROL (“OFAC”); AND ALL OTHER EXPORT CONTROL LAWS OR REGULATIONS OF THE U.S. OR OTHER COUNTRIES.

RESTRICTION: PROPRIETARY AND COMPANY CONFIDENTIAL INFORMATION OF NORDAM AND/OR ITS CUSTOMER OR SUPPLIER. THIS DOCUMENT AND ITS ATTACHMENTS (“DOCUMENT”) ARE GOVERNED BY A NON-DISCLOSURE AGREEMENT (“NDA”) BETWEEN NORDAM AND ANYONE WHO USES OR ACCESSES THIS DOCUMENT (“USER”). IF NORDAM AND USER HAVE NOT SIGNED AN NDA, THEN BY ACCESSING THE DOCUMENT, USER AGREES:

THIS DOCUMENT MAY BE USED OR DISCLOSED SOLELY FOR PURPOSE(S) PREVIOUSLY APPROVED BY NORDAM IN A SEPARATE WRITING AND ONLY IN ACCORDANCE WITH RESTRICTIVE MARKINGS ON THE DOCUMENT, AND UNDER NO CIRCUMSTANCES SHALL THE DOCUMENT OR ANY INFORMATION DERIVED FROM THE DOCUMENT BE USED OR DISCLOSED FOR ANY PURPOSE THAT DOES NOT BENEFIT NORDAM DIRECTLY. UPON NORDAM’S REQUEST, THIS DOCUMENT (AND ALL INFORMATION DERIVED FROM IT) SHALL BE RETURNED TO NORDAM. THIS DOCUMENT IS COMPANY CONFIDENTIAL COMMERCIAL INFORMATION EXEMPT FROM DISCLOSURE UNDER THE FREEDOM OF INFORMATION ACT (“FOIA”) OR SIMILAR FOREIGN LAW.
1.0 PURPOSE
This policy emphasizes NORDAM’s commitment to comply with all applicable laws and regulations prohibiting human trafficking and slavery and NORDAM’s expectation that its Stakeholders, suppliers, subcontractors and agents shall also comply with all applicable laws prohibiting such exploitation.

2.0 SCOPE
This policy applies to all NORDAM Stakeholders, suppliers, subcontractors and agents.

3.0 RESPONSIBILITIES
It is the responsibility of Stakeholders, NORDAM management, and NORDAM’s suppliers, subcontractors and agents to adhere to this policy.

It is the responsibility of NORDAM management to ensure compliance with this policy.

4.0 DEFINITIONS
U.S. Government’s Policy Prohibiting Trafficking in Persons


5.0 POLICY

5.1 NORDAM shall and NORDAM shall require its suppliers, subcontractors, and agents to comply with all applicable laws and regulations prohibiting human trafficking and slavery, including without limitation, the U.S. Government’s Policy Prohibiting Trafficking in Persons.

5.2 NORDAM will notify its Stakeholders, suppliers, subcontractors and agents of this policy and of the U.S. Government’s Policy Prohibiting Trafficking in Persons.

5.3 NORDAM will take appropriate action, up to and including termination, against Stakeholders, suppliers, subcontractors and agents who violate this policy, or when applicable, the U.S. Government’s Policy Prohibiting Trafficking in Person.

5.4 Stakeholders, suppliers, subcontractors and agents who believe there has been a violation of this policy should report it to one of the NORDAM Ethics Toll-Free Helplines:

USA 1-866-549-4983
Mexico 01-855-677-5809
Singapore 800-110-2072
United Kingdom 0808-234-6537
https://NORDAM.alertline.com

5.5 NORDAM will not tolerate any retaliatory action against anyone who reports a genuine belief that this policy or the U.S. Government’s Policy Prohibiting Trafficking in Persons has been violated. NORDAM will investigate and follow-up on reported incidents. NORDAM shall report to the Contracting Officer and the agency Inspector General immediately any credible information it receives from any source of a violation of the U.S. Government’s Policy Prohibiting Trafficking in Persons. Each Stakeholder and employee of any NORDAM supplier, subcontractor or agent also has the right to make such a report with protection from reprisal under DFARS subpart 203.9 and also to report incidents to the Global Human Trafficking Hotline number at 1-844-888-FREE (3733) and/or help@befree.org.
5.6 NORDAM will implement training on this policy to Stakeholders and NORDAM management who have direct responsibility for NORDAM’s employment practices and NORDAM’s supply chain management.

6.0 REFERENCES
None

7.0 CHANGE HISTORY

<table>
<thead>
<tr>
<th>REV DATE</th>
<th>REV LEVEL</th>
<th>DESCRIPTION OF CHANGE</th>
<th>CHANGED BY</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/01/2016</td>
<td>IR</td>
<td>Initial Release</td>
<td>Brian Schlegel</td>
</tr>
</tbody>
</table>