



CORPORATE HEADQUARTERS
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Anti-Trafficking Policy and Compliance Program

Tempel Steel Company (“Tempel”) strives to create a workplace that complies with all applicable employment and labor laws, including all laws concerning anti-trafficking and forced child labor. Tempel has a zero tolerance for human trafficking and forced labor and maintains robust compliance and ethics programs aligned with these values. Tempel is committed to acting ethically and with integrity in all of its business dealings and relationships and enforcing effective systems and controls to ensure human trafficking and forced child labor is not taking place anywhere in the Company’s own business or in any of its supply chains.

Policy

This Anti-Trafficking Policy and Compliance Program (“Policy”) is a key component of Tempel’s demonstrated intolerance for corruption and/or unethical behavior. Tempel is committed to the following:

1. That it will not engage in any trafficking in persons or related activities, including but not limited to the use of forced labor;
2. Maintaining hiring and subcontracting policies to protect the rights of its employees and the rights of subcontractor employees and will comply with those policies;
3. Notifying employees and subcontractors of:
 - a. The responsibility to report trafficking in persons violations by Tempel or any of its agents, subcontractors, or their agents, at any tier; and
 - b. Employee protection from reprisal for whistleblowing on trafficking in persons violations, including protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9.

Responsibilities/Enforcement

The General Counsel has overall responsibility for ensuring this Policy complies with Tempel’s legal and ethical obligations, and that all those under Tempel’s control comply with it. In addition, the General Counsel meets regularly with the Strategic Sourcing Officer and other Executive Leadership to ensure Tempel, and its suppliers and contractors, comply with this policy.

Managers have primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular education on it and the issue of human trafficking in supply chains.

Supply Chain Due Diligence and Safeguards



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In accordance with Federal Acquisition Regulation (FAR) Parts 52.222-50 and 52.222-56 and Defense Federal Acquisition Regulation Supplement (DFARS 252.222.7007, Tempel Steel Company has implemented this Compliance Plan:

1. To prevent any prohibited activities identified in paragraph (b) of the clause FAR 52.222-50, *Combating Trafficking in Persons*, and
2. To monitor, detect, and terminate any contracts with subcontractors engaging in prohibited activities identified at paragraph (b) of the clause FAR 52.222-50, *Combating Trafficking in Persons*, and
3. To perform our due diligence, to the best of our knowledge and belief, neither we nor any of our proposed agents, subcontractors, or their agents:
 - a. Is engaged in any such activities; or
 - b. If abuses to any of the prohibited activities identified in 52.222-50(b) have been founded, Tempel or any of its agents, subcontractors, or their agents has taken the appropriate remedial and referral actions.

Tempel's Strategic Sourcing Officer is responsible for making Tempel's anti-trafficking policies known to suppliers and requiring agents. Where applicable, Tempel includes the Federal Acquisition Clauses regarding Human Trafficking (52.222-50 and 52.222-56) in all subcontracts and in all contracts with requiring agents. Whenever subcontractors are required under these clauses to submit a certification, Tempel shall require submission prior to the award of the subcontract and annually thereafter.

At the proposal stage, anti-trafficking and other human rights-related vetting of third parties will be completed by Tempel's Strategic Sourcing team. Tempel follows the guidance in the United Nations Guiding Principles on Business and Human Rights, and prioritizes for attention those supplies with a profile presenting the most significant risks of adverse human rights impacts, whether based on the particular operations or operating context, the goods or services involved, or other factors. Based on the results of this risk assessment, certain providers may require heightened pre-contract due diligence, as well as post-contract monitoring.

For certain projects believed to be a high risk, additionally vetting of subcontracts may include requesting and reviewing subcontractor compliance plans prior to subcontract award to ensure they include adequate monitoring procedures. During contract performance, any indication that vendors or suppliers are potentially engaged in trafficking-related activities will be investigated. Periodic audits may also be implemented for projects of goods and services that are not susceptible to trafficking and forced labor.

Tempel is not responsible for the compliance of its vendors and subcontractors.

Compliance with this Policy



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The prevention, detection and reporting of human trafficking and forced child labor in any part of Tempel's business or supply chains is the responsibility of all those working for the Company or under the Company's control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

All reports of suspected ethics violations are investigated and, if a violation is confirmed, appropriate action is taken. That action may include disciplinary action, up to and including termination of employment with Tempel and disclosure to the relevant authorities. In addition, if an employee fails to report a suspected violation, he or she could be subject to disciplinary action, up to and including termination of employment. Tempel will follow all legal requirements regarding the reporting of suspected trafficking or other violations of the law, including, where applicable, disclosures to contracting officers, the Office of Inspector General, or law enforcement.

An employee must notify his or her manager as soon as possible if he or she believes or suspects that a conflict with this Policy has occurred or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of human trafficking or forced child labor in any parts of Tempel's business or supply chains of any supplier tier at the earliest possible stage.

If an employee believes or suspects a breach of this Policy has occurred or that it may occur the employee must notify his or her manager as soon as possible. Where appropriate, and with the welfare and safety of local workers as a priority, Tempel will give support and guidance to its suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Tempel's supply chains constitutes any of the various forms of human trafficking or whether forced child labor may be occurring, raise it with your manager. If the matter is not remedied, report the matter to Tempel's General Counsel (773-250-8017). An employee also may make an anonymous report to Tempel's compliance hotline at 1-844-280-5338.

Where misconduct is uncovered through an internal investigation, third party audit, or otherwise, the misconduct will be remedied through corrective action, and preventative measures will be implemented to reduce the risk of reoccurrence.

Tempel aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. Tempel is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that human trafficking or forced child labor of whatever form is or may be taking place in any part of the Company's own business or in any of the Company's supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If an employee believes he or she has suffered any such treatment, the employee should inform his or her manager or the General Counsel immediately.



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Acknowledgment

I have read, understand, and agree to comply with this Policy.

Signature

Date

Print Name