

CODE OF CONDUCT POLICIES

HUMAN TRAFFICKING POLICY AND COMPLIANCE PLAN

Purpose

To state the Company's policy regarding combating human trafficking.

Scope

This Policy applies to all team members of Amerex Corporation and its divisions ("Amerex" or "Company") and all subcontractors and agents, performing work subject to Federal Acquisition Regulation ("FAR") 52.222-50, Combating Trafficking in Persons.

Policy Statement

Amerex complies with the requirements of FAR 52.222-50, Combating Trafficking in Persons, which prohibits contractors on certain government work from engaging in human trafficking, the use of forced labor or the procurement of commercial sex acts during contract performance. For work performed subject to that FAR, the following will apply:

- A.** If applicable under the laws of the location where the work is to be performed, the Company will provide an employment contract or employee agreement in writing to team members performing the work, containing the wages they are to be paid while on the assignment, in the team member's native language prior to their departing from their country of origin. The Company will also provide all team members assigned to Department of Defense contracts a copy of this Policy and plan prior to the commencement of their assignment. The Policy explains the consequences for violating the Policy, as well as mechanisms for reporting violations.
- B.** Team members will be required to confirm that they are aware of and understand each of these items prior to the commencement of their assignment.
- C.** All Company team members are required to promptly report any suspected human trafficking-related activity to the McWane Access Line at 1-877-231-0904 in the United States, its territories or Canada or to the McWane, Inc. legal department by mail, fax, email or phone.

- 1. By Mail: Amerex Corporation
c/o McWane, Inc.
2900 Highway 280, Suite 250
Birmingham, AL 35223
ATTN: Legal Department
- 2. By Fax: 205-578-3897 ATTN: Legal Department

AMEREX CORPORATION

Issue Date: 10/23/2015

Page 2 of 3

CODE OF CONDUCT POLICIES

3. By Email: jim.proctor@mcwane.com or bill.marshall@mcwane.com or teri.lavette@mcwane.com or matt.pasulka@mcwane.com or kristi.caradonna@mcwane.com
4. By Phone: 205-578-3811
- D.** The Company will protect and interview all team members suspected of being victims of or witnesses to prohibited activities. This will occur prior to the team member returning to their country of origin if the team member is located outside their country of origin at the time of the incident being reported. The Company will not prevent or hinder team members from cooperating fully with government authorities.
- E.** In the event of any suspected human trafficking-related activity, the Company will notify, as necessary, the Inspector General of the applicable government agency, the official responsible for suspension or debarment actions, and, if necessary, law enforcement.
- F.** Amerex strictly prohibits destroying, concealing, confiscating or otherwise denying access to team member identity or immigration documents.
- G.** Amerex strictly prohibits misleading or fraudulent recruiting practices during the recruitment of team members. Recruiters are required to provide accurate information to all team members in regards to the assignment they are being offered.
- H.** Recruiters are subject to corrective actions, up to and including termination, if it is determined they charged any team member a recruitment fee, or intentionally provided inaccurate information to a team member regarding assignment details, such as wages, living conditions, and/or work location.
- I.** On contracts in which the Company is to provide housing to team members, the provision of housing will be, at a minimum, in compliance with the host country's safety standards.
- J.** Amerex will provide return transportation costs for team members who have finished employment outside that team member's nation of residence.
- K.** Each subcontractor of Amerex will be required to agree in its contract for work performed subject to FAR 52.222-50 to (a) fully cooperate with enforcement agencies to conduct audits and investigations on anti-trafficking compliance; (b) provide the Company with a copy of its Human Trafficking Policy and Compliance Plan in accordance with Amerex and U.S. Government policy; (c) certify annually that neither the subcontractor, nor any of its agents, have engaged in human trafficking, the use of forced labor or the procurement of commercial sex acts during contract performance; and (d) be subject to on-going monitoring for human trafficking-related activities and random audit by Amerex. Any red flags will be investigated and reported accordingly. Failure to comply with the requirements of the FAR and/or this Policy by a subcontractor will be grounds for the Company to take any and all appropriate actions, up to and including immediate termination of that subcontractor's contract with the Company.

AMEREX CORPORATION

Issue Date: 10/23/2015

Page 3 of 3

CODE OF CONDUCT POLICIES

- L.** The Company will remedy all violations of this Policy of which the Company is made aware, promptly in such a way as to correct the violation and ensure that preventative measures are in place to prevent future violations, including but not limited to termination of employment and contract suspension or termination for repeat violations.
- M.** Any agents, subcontractor or subcontractor employees that are determined to have engaged in human trafficking-related activities will be terminated immediately from providing work for the Company.
- N.** A copy of this Policy and Compliance Plan will be posted at the worksite of all U.S. Government contracts for work performed outside the U.S. and for all U.S. Government contracts exceeding \$500,000 in which the Company has active team members assigned. A copy will also be posted on the Company websites.
- O.** If requested, a copy will also be provided to the applicable contracting officer.
- P.** If there are any substantiated allegations of human trafficking, the Company will ensure they are included in the Federal Awardee Performance and Integrity Information System (FAPIIS).
- Q.** The Company will cooperate with all legal requirements regarding policy transparency (including, for example, any future anti-trafficking initiatives similar to the California Transparency in Supply Chains Act) that call for companies to disclose their efforts to ensure that their supply chains are free of forced labor and other human trafficking-related activities.

CERTIFICATION

The Company must certify annually during performance of any covered contract that:

- This Policy and Compliance Plan is currently in place and actively adhered to at all times;
- To the best of the Company's knowledge and belief, neither the Company nor any of its team members are engaged in any human trafficking-related activities, including human trafficking, the use of forced labor, or the procurement of commercial sex acts during contract performance.
- No abuses have been found to date; however, if any abuses are reported, the Company will take appropriate action(s) in response to the abuse(s).