

LINDINGER INSPECTION ENGINEERS, INC

# MODERN SLAVERY AND HUMAN TRAFFICING POLICY

01 April 2022, Rev.0

- ▶ Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced labor, compulsory labor, and human trafficking. Lindinger Inspection Engineers, Inc (LINDINGER) has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains. LINDINGER is also committed to ensuring there is transparency in our own business and in our approach to addressing modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

# Who Must Comply with This Policy?

- ▶ This policy applies to all persons working for LINDINGER or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and LINDINGER may amend it at any time. It is reviewed regularly.

# Our Guiding Principles

- ▶ LINDINGER has made employee/contractor well-being a priority and as part of our focus on our Associates, we are committed to taking steps to address modern slavery. Our Guiding Principles influence everything we do. Modeling these behaviors and attitudes in a holistic manner helps our Associates and Business Partners navigate even the most complex situations. We believe in partnering only with others who share our values and who understand the importance of always conducting business ethically. This policy governs the activities of LINDINGER with regard to addressing forced labor, human trafficking and slavery and servitude (collectively, “modern slavery”) in our business and supply chains. This statement is published pursuant to the Modern Slavery Act 2015 (UK) and the *Modern Slavery Act 2018* (Cth) (the Australian Modern Slavery Act). We are committed to working with our global partners to create conditions so that no employee pays for their job; employees/contractors full freedom of movement; and all employees/contractors are informed of the terms of their employment.

# Our Business and Supply Chains

- ▶ LINDINGER is a global leader in Supplier Quality Surveillance and Expediting Services. We expect all of our Global Associates to operate in a responsible, ethical, open and transparent way and in compliance with all applicable laws and regulations. Based on the nature of our business, workforce, and the services we provide, we consider our business and direct supply chain to be lower risk for modern slavery. Nevertheless, LINDINGER recognizes that we have a role to play in the global effort to eliminate modern slavery and human trafficking, regardless of the level of pervasiveness across our industry. LINDINGER relies on the use of Qualified and Highly Vetted Individuals to support high quality, effective and efficient delivery of our services to Customers. Our Contractors are predominantly individuals who have Specialized Qualifications, a minimum of 10 years work experience, and manage their own time and efforts. Additionally, we have relationships with other Global SQS Companies which are global leaders in their industries, and have developed and implemented comprehensive Modern Slavery best practices and statements.

# Our Policies, Training and Principles

## ▶ Code of Business Conduct

▶ All LINDINGER employees/contractors must comply with this Policy. Violation of this Policy by an employee/contractor can result in disciplinary action, including termination of employment/contract.

## ▶ Training

▶ We understand that training is crucial to raising awareness of issues around modern slavery including how to spot signs of trafficking and where to report concerns. As part of our onboarding and on-going training process, employees and contractors are provided a copy of this Policy as included in Lindinger's Associate Manual and are asked to acknowledge receipt and understanding. This Policy is also posted to Lindinger's website.