

PRECISION ENGINEERING LLC (PE) is committed to maintaining a high standard of ethics in the conduct of its business.

Accordingly, PE strives to provide fair working conditions, acknowledges human rights, and complies with the Code of Conduct mandated by our parent company (The Heico Companies LLC), as well as with applicable governmental laws and regulations. Additionally, PE is committed to a work environment that is free from human trafficking and slavery; and we explicitly reject any form of forced labor, unlawful labor, or prohibited disciplinary practices (e.g., corporal punishment).

PE expects our customers, suppliers, and other business partners to share our commitment to fair working conditions, nondiscrimination, and anti-human trafficking and will maintain our relationships with these third parties accordingly.

DEFINITIONS

- Human Trafficking: The use of force, fraud, or coercion to obtain labor or service, of any kind, which has not been offered voluntarily. (*ILO Forced Labour Convention, C29, 28 June 1930*)
- Anti-Human Trafficking (AHT): Efforts to eliminate all forms of human trafficking and forced labor.
- Anti-Human Trafficking Program: An organized approach and structure designed to detect, mitigate, and deter human trafficking and forced labor.
- Supplier(s): Any individual or entity that provides goods or services to PE – *including but not limited to third-party agents, contractors, subcontractors, service providers, and providers of goods.*

APPLICABILITY

PE maintains an Anti-Human Trafficking (AHT) program, taking a risk-based due-diligence approach to detecting and deterring human trafficking and all forms of forced or unlawful labor. This policy governs the entire PE supply chain.

PE EMPLOYEES

Our employees are responsible for complying with PE's policies and procedures, including those related to human trafficking and forced labor; and they are required to behave and operate in a manner consistent with our values. Employees found to be in violation of our policies and procedures are subject to disciplinary action.

SUPPLIERS

PE shall not do business with any Supplier (individual or entity) that it knows to have a demonstrated or reputed inability or unwillingness to comply with applicable law, this "Anti-Human Trafficking and Slavery Supplier Policy", or any of PE's Supplier requirements.

This policy requires Suppliers to ensure that human trafficking, forced (slave) labor, child labor, and/or any other type of unlawful labor is not used in the performance of work.

PROHIBITED PRACTICES

Prohibited practices include, but are not limited to:

- Transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.
- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- 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 employees or in the offering of employment/contract positions. For example:
 - Failing to disclose basic information in a format and language understood by the employee or applicant.
 - Making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment. For example:
 - wages and fringe benefits
 - the location of work
 - the living conditions, housing, and associated costs (*if provided by the employer or agent*)
 - any significant cost to be charged to the employee or applicant, and
 - if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants recruitment fees.
- If required by law or contract, failing to provide return transportation, or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.

VIOLATIONS

In addition to the potential loss of PE's business, Suppliers should be aware that violations of the US Government's policies against human trafficking and forced or unlawful labor may also result in criminal prosecution of responsible individuals by the applicable governmental authorities.