

## Willington Nameplate Human Trafficking, Child Labor, and Forced Labor Policy

**Purpose** - Willington Nameplate is committed to ensuring that all business operations are conducted ethically and in compliance with all applicable laws and regulations. This policy outlines our stance against human trafficking, child labor, and forced labor.

**Scope** - This policy applies to all employees, contractors, suppliers, and business partners of Willington Nameplate.

### Policies

#### Human Trafficking

Willington Nameplate strictly prohibits any form of human trafficking within its operations and supply chain.

Willington Nameplate, Inc. is committed to full compliance with the U.S. Government's laws, regulations, and policies that prohibit trafficking in persons, including Executive Order 13627, "Strengthening Protections Against Trafficking in Persons in Federal Contracts"; FAR Subpart 22.17; FAR 52.222-50; FAR 52.222-56; USAID's Standard Provisions regarding Trafficking in Persons and any other regulations from other agencies and governments, as applicable.

#### **Willington Nameplate, Inc. Prohibits:**

- Engaging in any form of human trafficking
- Engaging in commercial sex acts that may be directly associated with Pact, which includes during work hours, while attending off-site functions, and any time in work travel status
- Using forced labor of any kind for any reason
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents
- Using misleading or fraudulent recruiting practices
- Charging employee candidates recruitment fees for employment

- Failing to pay contractually agreed return transportation costs for certain employees who have finished employment outside that employee's nation of residence
- Providing or arranging housing that fails to meet the host country's housing and safety standards
- Failing to provide proof of employment or similar work document in writing prior to the employee departing from his or her country of origin

Any employee or contractor found to be involved in human trafficking will face immediate termination and legal action.

### **Child Labor**

Willington Nameplate does not employ individuals under the age of 18.

We require all suppliers and business partners to adhere to the same standard and will terminate relationships with those found to be in violation.

### **Forced Labor**

Willington Nameplate prohibits the use of forced labor, including bonded labor, involuntary prison labor, and indentured labor.

We will ensure that all work is voluntary and that employees are free to leave their employment at any time.

Suppliers and business partners will be held to the same ethical standards.

## **Reporting and Compliance**

Employees and contractors are encouraged to report any suspected violations of this policy to their supervisor or the Human Resources department.

Willington Nameplate will investigate all reports promptly and thoroughly.

Retaliation against individuals who report violations in good faith is strictly prohibited.

## **Training and Awareness**

Willington Nameplate will provide regular training to employees and contractors on the importance of this policy and how to identify and report violations.

Suppliers and business partners will be informed of this policy and required to comply as a condition of their contract.



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### **Review and Updates**

This policy will be reviewed annually and updated as necessary to ensure continued compliance with legal requirements and best practices.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

