

Combating Human Trafficking and Modern Slavery



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Inglett & Stubbs International (ISI) is an engineering, procurement, construction, maintenance and project management company based in Atlanta, Georgia, USA. We operate in multiple countries and work with clients including the US Government and clients in various industries around the globe. Our supply chain consists of suppliers from many differing countries who provide materials, equipment, and services to our projects.

ISI's commitment to always do the right thing stems back to the I&S Groups founding in 1954. The principles of treating customers and employees fair and respectfully continues through today. ISI believes this commitment is critical to our ongoing success and we believe it is a positive impact on our suppliers, customers, employees, and the communities where we do business.

MODERN SLAVERY

ISI recognizes Modern Slavery as any of the four following:

- Slavery - a person over whom any of the powers attaching to the right of ownership are exercised - the key element of slavery is the behavior on the part of the offender as if he/she owns the person or deprivation of the victim's freedom
- Servitude - the obligation to provide services imposed using coercion includes the impossibility of changing the victim's condition
- Forced or compulsory labor - involves coercion, either direct threats of violence or more subtle forms of compulsion - work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily
- Human Trafficking - a person arranges or facilitates the travel of another person with a view to that person being exploited - this can be committed even where the victim consents to the travel

MODERN SLAVERY PROTECTIONS

ISI is fully committed to implementing and enforcing effective systems and controls to provide confidence that modern slavery does not exist in our business or our supply chain. ISI commits to enact the following actions to ensure this is the case:

- A process is available for employees to report activity inconsistent with this plan, without fear of retaliation.
- A clean, safe, secure, and healthy working and living environment is provided.
- Unrestricted access to ablution facilities and clean water is provided.
- Worker accommodations will be kept to local or national standards as a minimum.
- Child labor is not allowed
- Wage payments are made consistent with applicable law
- All workers are treated fairly regarding recruitment, employment, and fair employment practices.

- Workers will not be discriminated based on their nationality, gender, ethnicity, social status, race, religion, or other characteristics.
- Misleading or fraudulent actions are not tolerated during recruitment of employees, recruitment fees charged to the employee are prohibited.
- Forced, compulsory, bonded or indentured labor, other human trafficking practices, or any other violations of human and labor rights in accordance with local, national, or international standards are not permitted.
- All workers have access to personal documentation including travel papers and passports.
- Worker's dignity is always protected. Inhumane treatment, abuse and humiliating disciplinary action are not allowed.
- All workers have freedom of movement outside normal working hours, except for legitimate safety or security issues that might threaten the health, safety and well-being of the worker.

SUPPLY CHAIN

ISI assesses our operations and our procurement activities on an ongoing basis to provide confidence that modern slavery does not exist in our supply chain. Additional focus is provided in geographic regions where there is increased risk.

Our contracting practices include vendor and subcontractor compliance with ISI's policy on Combatting Human Trafficking and Modern Slavery, including training of suppliers that do not have a specific existing internal policy that is in compliance with ISI's standards.

Suppliers must meet the criteria above and provide written documentation of compliance with the requirements of this Code at the start of all contracts and once per year thereafter.

POLICIES

ISI's expectations for employee's actions are communicated in the ISI Code of Business Ethics and Conduct. Each employee is required to read and understand this material and acknowledge acceptance of these guidelines in writing. In addition to the Code, ISI provides an initial training and annual refresher training for all employees.

REPORTING

Employees who suspect or know of possible Human Trafficking or Modern Slavery misconduct should report their concerns to their manager, their Human Resources representative, or Chris Williams, the Corporate Ethics Officer. He can be reached at +1 404 214 6724 or cwilliams@inglett-stubbs.com. You can also send mail to 5200 Riverview Road, Mableton, Georgia, 30126, USA.