

# **CURTISS-WRIGHT CORPORATION**

## **Human Trafficking and Slavery**

**(Amended and Updated 2019)**

For purposes of this Policy, "Curtiss-Wright" shall mean both Curtiss-Wright Corporation and its wholly owned subsidiaries, and the word "employee" shall mean an officer or other employee of Curtiss-Wright Corporation or of any of its wholly owned subsidiaries.

### **I. PURPOSE**

To outline the policy and procedures to be followed to combat the use of slave labor and/or human trafficking in the supply chain of goods produced by Curtiss-Wright. Policy No. 1, "Code of Conduct" prohibits Curtiss-Wright and its employees from using child or slave labor or doing business with any supplier or subcontractor who does so. Curtiss-Wright also maintains a Supplier Code of Conduct that is published on our website. Child labor is defined in our Codes of Conduct as labor involving children who are younger than sixteen. This policy reinforces the Corporation's commitment to combating child and slave labor in response to global legislation on this issue.

### **II. SCOPE**

The Corporation is committed to adopting procedures that are appropriate for the nature of the child and slave labor risk faced in the production of Curtiss-Wright products. An assessment of the extent of child or slave labor is set forth in annual reports published by the U.S. Department of Labor pursuant to the Trafficking Victims Protection Reauthorization Act of 2005. The most recent report (2018) lists materials that are produced with child or slave labor. This policy will also be used to produce further transparency into our supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA). Procurement professionals within the major Curtiss-Wright businesses have reviewed the list and determined that the Corporation uses only an insignificant number of materials that have traditionally been produced with child or slave labor. Accordingly, the Corporation faces little risk of using materials produced by child or forced labor and is adopting the measures set forth below that are reasonable in light of this insignificant risk.

### **III. PROCEDURES**

- A. All Curtiss-Wright employees involved in the procurement of materials must be given a copy of this policy to provide training on the Corporation's commitment to fighting child and slave labor and the procedures to be followed to contain the risk of child and slave labor.
- B. The Corporation's contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy. We will request from our supplier where we have concern a certification from the supplier in the following form:

*I, the \_\_\_\_\_ of [NAME OF SUPPLIER/SUBCONTRACTOR], do hereby certify that the production of materials incorporated into any product sold or otherwise provided to Curtiss-Wright Corporation and/or its subsidiaries complies with laws regarding slavery and human trafficking of the country or countries in which my firm does business.*

- C. The relevant supply chain personnel will maintain records reflecting the identity of any supplier/subcontractor who refuses to sign the above-described certification or as to whom the personnel receive reasonable evidence of the use of child or forced labor. Supply Chain personnel will confer with the Law Department to develop a recommendation on the continued use of the supplier/subcontractor for decision by senior management.

### **IV. RESPONSIBILITY AND ACCOUNTABILITY**

- A. Each Subsidiary Board of Directors shall have overall responsibility for this policy and in ensuring that their business complies with all its legal and ethical obligations.
- B. The Vice President and General Managers will have the primary responsibility for the implementation of this policy and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure effectiveness.
- C. All General Managers are responsible for ensuring that their facilities comply with the provisions of this policy in the day-to-day performance of their roles.

### **V. COMMUNICATION AND EMPLOYEE AWARENESS TRAINING**

- A. Line Managers will ensure that relevant staff receive adequate training on this policy and any supporting processes applicable to their role.

## **VI. BREACHES OF THIS POLICY**

- B.** Any breaches of this policy will be taken seriously and dealt with on a case-by-case basis.
- C.** The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be considered gross misconduct and subject to immediate termination.
- D.** Everybody to whom this policy applies will be expected to co-operate fully with any investigation into suspected breaches of this policy or any related processes or procedures.
- E.** If any part of this policy is unclear, clarification should be sought from the local HR Manager.

## **VII. STATUS OF THIS POLICY**

- F.** This Anti-slavery policy will be reviewed by the Company's senior management on a regular basis.
- G.** This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes that may affect them.