



HUMAN TRAFFICKING POLICY

PURPOSE

The United States ("US") Government has a zero-tolerance policy relating to Trafficking in Persons and procuring Commercial Sex Acts and related behavior. RCO Engineering, Inc. and its subsidiaries ("RCO") intends to comply to the fullest extent possible with the US policy relating to Trafficking in Persons and Procuring Commercial Sex Acts and the purpose of this Policy is to implement such U S Government policy.

SCOPE

This policy applies to all Employees of RCO, Subcontractors and their employees ("Subcontractors") and Agents and their employees ("Agents") doing business with RCO, its subsidiaries and affiliated companies.

POLICY

Trafficking in persons, forced labor, and commercial sex are contrary to traditional values of dignity and respect and are illegal in many countries where RCO conducts its business. If an employee or representative of the company engages in said illegal behavior, such actions are contrary to RCO's Operating Philosophy.

RCO has adopted a zero-tolerance policy regarding RCO Employees, Subcontractors and Agents that engage in or support Severe Forms of Trafficking in Persons, procurement of Commercial Sex Acts, or use of forced labor.

RCO employees who fail to comply with this policy may be subject to disciplinary action up to or including termination of employment. For Subcontractors and Agents, failure to comply with this policy will constitute a material breach of the agreement being performed on behalf of Company and will subject the violating party to termination of the contract as well as damages relating to the breach.

In addition, conduct that involves Trafficking in Persons may also violate

- (a) a host country's Government laws and regulations relating to Severe Forms of Trafficking in Persons, procurement of Commercial Sex Acts, and use of forced labor, and
- (b) United States laws and regulations on Severe Forms of Trafficking in Persons, procurement of Commercial Sex Acts, and use of forced labor which may apply to its employees' conduct in the host nation, including those laws for which jurisdiction is established by the Military Extraterritorial Jurisdiction Act of 2000 (18 U.S.C. 3261-3267 and 18 U.S.C. 3271 Trafficking in Persons Offenses Committed by Persons Employed by or Accompanying the Federal Government Outside the United States).

ROLES AND RESPONSIBILITIES

RCO Employees, Subcontractors and Agents within the scope of their employment or contract relationship with RCO will not:

- Engage in or promote Severe Forms of Trafficking, which means (i) Sex Trafficking in which a Commercial Sex Act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age, or (ii) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to Involuntary Servitude, peonage, Debt Bondage, or slavery.
- Engage in Commercial Sex Acts, which means any sex act where anything of value is given to or received by any person.
- Use, engage in, or promote forced labor, which includes the use of coercion:
 - Threats of serious harm to or physical restraint against any person;
 - Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person;
 - The abuse or threatened abuse of the legal process; or
 - Debt bondage, which is the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for a debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

Subcontractors and agents will communicate RCO's zero-tolerance policy to its employees as well as the Company's intent to enforce same.

REPORTING AND RETALIATION

When informed of or witness to a violation of this policy, or when in doubt about the propriety of a particular course of action, RCO Employees, Subcontractors and Agents are encouraged to contact the RCO Manager of Human Resources. Communications can be made to the RCO Manager of Human Resources every day, 24 hours a day by email at cliff.veyhing@rcoeng.com. RCO will not tolerate any form of retaliation against anyone who, in good faith, communicates facts that could constitute a violation of this policy.

DEFINITIONS

Coercion means (i) threats or serious harm to or physical restraint against any person, (ii) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person, or (iii) the abuse or threatened abuse of the legal process.

Commercial Sex Act means any sex act where anything of value is given to or received by any person.

Debt Bondage means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debit, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

Involuntary Servitude means a condition of servitude induced by means of (i) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint, or (ii) the abuse or threatened abuse of the legal process.

Severe Forms of Trafficking means (i) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age, or (ii) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or Coercion for the purpose of subjection to Involuntary Servitude, peonage, Debt Bondage, or slavery.

Sex Trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

Questions regarding this policy can be directed to the RCO Manager of Human Resources (for employees) or the RCO Corporate Purchasing Manager (for Subcontractors and Agents).