

VPC Human Trafficking and Anti-Slavery Policy

Purpose

Virginia Panel Corporation ("VPC") is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. VPC will not tolerate or condone human trafficking or slavery in any part of our organization. This policy is consistent with VPC's Code of Ethics and Business Conduct and our core values to protect and advance human dignity and human rights in our business practices. VPC employees, contractors, subcontractors, vendors, suppliers, partners and others through whom VPC conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

Scope

This Policy applies to all personnel employed by or engaged to provide services to VPC, including, but not limited to, VPC's employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Policy, "employees").

Every VPC employee is responsible for reading, understanding and complying with this Policy. VPC managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them. If you have any questions or concerns relating to this Policy, consult the VPC HR Department. If you learn of any conduct that you believe may violate this Policy, report it immediately by any of the means listed under the heading "Policy Compliance" below.

Policy Statement

VPC prohibits trafficking in persons and slavery. VPC employees, contractors, subcontractors, vendors, suppliers, partners and others through whom VPC conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- 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 individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by VPC), any significant cost to be charged to the candidate, 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/candidates 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;
- or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

VPC has undertaken actions, and is committed to maintaining and improving its systems and processes, to eradicate human trafficking and slavery in its direct materials supply chain.

Investigations and Audits

VPC will perform investigations and audits to verify that business is being conducted in compliance with this Policy. All VPC employees and third parties through whom VPC conducts business are required to fully and promptly cooperate with VPC's internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information, and documents. Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting email or other documents, may be grounds for disciplinary action, up to and including termination, subject to applicable law.

Policy Compliance

Report any conduct that you believe to be a violation of this Policy, either directly to a member of the HR Department, to the Chief Operations Officer, or to VPC's President. Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by applicable law.

VPC will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.