



4 Ash St. Extension  
Derry, NH 03038

April 25, 2019

## **Anti-slavery/Human Trafficking Policy**

### **Purpose**

PICA Manufacturing Solutions is committed to a work environment that is free from human trafficking and slavery which includes forced labor and unlawful child labor.

PICA employees, vendors, supply partners and others through whom PICA 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 PICA including our supply partners and their suppliers.

### **Policy Statement**

PICA prohibits trafficking in persons and slavery. PICA employees, vendors, supply partners and others through whom PICA 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, 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.

PICA requires supply chain partners to observe all applicable laws and conduct business in an ethical and responsible manner. PICA has adopted the Electronic Industry Citizenship Coalition (EICC) Code of Conduct, which prohibits the use of forced, bonded, indentured or involuntary prison labor. PICA expects its supply partners to adopt the same Code of Conduct.

Richard Shevelow  
President