

PIONEER INDUSTRIES

A DIVISION OF



Pioneer Industries is committed to reducing the possibility of complicity in human rights violations relating to our supply chain operations by asking our supplier / contractors to conduct anti-trafficking due diligence to verify that:

1. To the best of the supplier / contractor's knowledge or belief, neither it, nor its agents or subcontractors, has engaged in any of the prohibited practices, or
2. If any violations have been found, the supplier / contractor has taken appropriate remedial and referral actions.

In fulfillment of Government Prime Contract orders suppliers must include the substance of Federal Acquisition Regulations (FAR) clause 52.222-50 in all contracts with agents and any subcontracts that have an estimated value that exceeds \$500,000 and that will be acquired or performed outside the United States.

In addition, we ask suppliers to develop a compliance plan based on the nature and scope of activities performed as well as the size and complexity of contracts applicable.

Compliance plans include:

- a. An employee awareness program about trafficking in persons, policies, activities prohibited, and remedies when violations occur;
- b. A process for employees to report violations without fear of retaliation;
- c. Recruitment and wage plans, including the requirement to only use bona fide recruitment companies and/or trained employees;
- d. Housing plans that meet host country housing and safety standards; and
- e. Procedures to place the same requirements on subcontractors at any tier.