

Anti-Human Trafficking and Slavery (AHTS) Policy

November 2023

Overview

Loeb Electric and the United States government prohibit trafficking in persons and slavery.

Loeb Electric is committed to a work environment and supply chain that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. Loeb Electric will not tolerate or condone human trafficking or slavery in any part of our organization.

For ease of understanding and brevity—and only for the purpose of this document—any reference to:

- Loeb Electric employees, temporary employees, subsidiaries, contractors, subcontractors, and independent contractors shall be collectively referred to as "employees."
- Vendors, suppliers, partners, agents, and others through whom Loeb Electric conducts business shall be collectively referred to as "vendors."

The use of these terms, whether in the singular or plural, is intended solely for convenience and does not alter or affect the legal status or responsibilities of the individuals, entities, or parties involved.

Scope

Employees and vendors must avoid complicity 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 employee to the employee's identity or immigration documents, such as passports or driver's licenses, regardless of issuing authority.

(continued next page)

Scope (continued)

- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, basic information; or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing, and associated costs (if provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.

Expectations

Internal

Loeb Electric will ensure that its employees are of legal working age for their position and will comply with local laws for student employment or student work, such as internships or apprenticeships.

Loeb Electric shall respect its employees' rights to agree to terms and conditions of employment voluntarily without coercion.

Loeb Electric asks that all employees report any conduct believed to be in violation of this policy to Loeb Electric's Human Resources department or any member of management.

Loeb Electric 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.

External

Vendors must operate in full compliance with all applicable local, regional, and national laws and regulations.

Vendors are required to provide a safe and healthy working environment for their employees. This includes compliance with occupational health and safety regulations, proper training, and the provision of necessary safety equipment.

Vendors must not employ individuals below the legal working age in their respective jurisdictions. Age verification processes must be in place during the hiring process, and records of age verification should be made available upon request.

Vendors are expected to continually assess and improve their practices to align with evolving ethical, social, and legal standards.



Conclusion

Loeb Electric will communicate this Anti-Human Trafficking and Slavery (AHTS) policy internally and externally, as appropriate, to ensure all stakeholders are aware of our commitment to combat human trafficking and slavery.

By implementing this AHTS policy, Loeb Electric reaffirms its commitment to ethical conduct, responsible business practices, and its dedication to eradicating these crimes from our operations and supply chains.