

PROHIBITION AGAINST TRAFFICKING IN PERSONS POLICY

PURPOSE (OBJECTIVE)/SCOPE

To instill a climate of full compliance with all federal and state laws concerning the United States Government's policy prohibiting trafficking in persons.


APPLIES TO

All employees of Ducommun Incorporated and its wholly owned subsidiaries (hereinafter referred to as the "Company" or "we") as well as all applicants for regular, temporary, and part-time employment (including summer or intern positions), suppliers and contractors.

POLICY

In support of the United States Government policy prohibiting trafficking in persons, the Company is committed to complying with Executive Order 13627 "Strengthening Protections Against Trafficking in Persons in Federal Contracts" and title XVII of the National Defense Authorization Act for Fiscal Year 2013. As such, we expect our employees and suppliers to not engage in the use of forced, bonded or indentured labor, involuntary prison labor, and slavery, and to not procure commercial sex acts, or engage in trafficking of persons. Specifically, we expect employees and suppliers to not participate in the following activities or practices:

- Recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, fraud, or coercion for the purpose of subjecting them to involuntary servitude, peonage, debt bondage, or slavery;
- Inducing or engaging in a commercial sex act induced by force, fraud, or coercion, or in which the person induced to perform such act is younger than eighteen (18) years of age;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of the issuing authority;
- Using misleading or fraudulent practices during the recruitment of employees or failing to disclose, in a language accessible to the worker, information relating to the terms of employment, living conditions, housing, the hazardous nature of the work, or using recruiters who do not comply with local labor laws of the country in which the recruiting occurs;
- Charging employees recruitment fees;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment for an employee who is not a national of the country in which the work occurs, or for an employee who is not a United States national and who was brought to the United States for the purpose of working on a United States Government contract or subcontract;
- Providing or arranging for housing that fails to meet the host country's housing and safety standards; and

	Policy No.: HR 1.5	Page: 2 of 2
	Prohibition Against Trafficking in Persons Policy	
Last Reviewed Date: 05/15/17	Effective: 05/22/17	Revision No.: 1

- Failing to provide for an employment contract, recruiting agreement, or other required work document in writing, if required by law or contract.

Policy Administration

Failure to comply with this Policy will result in disciplinary action up to and including employee or supplier termination

RESPONSIBILITIES

Employee Responsibilities

All Ducommun employees, contractors, agents and suppliers are expected to be familiar with this Policy and the prohibited human trafficking activities described above and to avoid them. Failure to abide by this Policy may result in disciplinary action up to and including termination.

Individuals may report, without fear of retaliation, any suspected violations of this Policy, following the reporting guidance in Ducommun’s Code of Business Conduct and Ethics which includes contacting the Company’s Vice President, Chief Human Resources Officer, the Vice President, General Counsel and/or by filing a complaint (anonymous or otherwise) through the Company’s whistleblower hotline at (800) 735-1265 or www.ducommun.alertline.com.

Manager Responsibilities

Adhere to and administer this policy and to report any concern or violation to Human Resources.

HR Responsibilities

Administer this policy and investigate all areas of non-compliance.