

Slavery and Human Trafficking Statement

MR-F8.4 F, Revision IR., May 30, 2018

MECHANICAL RUBBER PRODUCTS CO., INC.

CONSOLIDATED DISCLOSURE STATEMENT UNDER THE:

- TRAFFICKING VICTIMS PROTECTION ACT
- U.N. PALERMO PROTOCOL
- U.N. GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS (UNGPS)
UNIVERSAL DECLARATION OF HUMAN RIGHTS
- INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHTS
- INTERNATIONAL COVENANT ON ECONOMIC, SOCIAL AND CULTURAL RIGHTS

About Mechanical Rubber

Mechanical Rubber is a manufacturer of custom rubber, plastic and metal products. Our products are used globally across many different industries. Mechanical Rubber is dedicated to combatting slavery of any kind and human trafficking.

For additional information about our business, including the wide variety of products manufactured, please visit our website at www.mechanicalrubber.com.

Powerful Purpose – Mechanical Rubber’s Policies and Governance Processes

At Mechanical Rubber, we consider how we achieve our results an important measure of success. Conducting business in an ethical manner is at the core of the Mechanical Rubber brand. Mechanical Rubber’s success as a high-performance company is tied directly to our long-standing commitment to the highest ethical standards. An important part of this commitment is ensuring that our suppliers and supply chain are not vulnerable to use by human traffickers.

Code of Ethics

Mechanical Rubber regards respect for human rights as a fundamental principle, and this is outlined in our Code of Ethics. We believe that all humans are to be treated ethically. We require all of our management, employees, and suppliers respect human rights.

Mechanical Rubber’s human rights policies are included in our Supplier Terms and Conditions. The terms and conditions are provided to all suppliers and must be agreed to before being considered to be an approved supplier.

Mechanical Rubber’s human rights policies are outlined in our employee handbook for the reference of all employees.

Supplier Code of Conduct

Mechanical Rubber’s Supplier Code of Conduct sets forth minimum workplace standards and business practices that are expected of any supplier Supplier doing business with us and is consistent with our company’s values. These requirements are applicable to Mechanical Rubber’s suppliers, their affiliates, and subsidiaries globally and includes prohibitions on the use of forced labor, slavery, and human trafficking. Our suppliers are hereby required to adhere to and certify compliance with the Supplier Code.



Slavery and Human Trafficking Statement

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Mechanical Rubber's Code of Ethics and Supplier Code of Conduct are integrated into policies, procedures and plans to ensure awareness and understanding of requirements.

Implementation responsibilities are further addressed in our employee handbook as well as this document and in the case of relevant US government contracting requirements, through a Trafficking in Persons - Compliance Plan, in accordance with Federal Acquisition Regulation human trafficking related requirements.

Anti-Human Trafficking and forced Labor Procedures

In support of all of these policies, processes and procedures Mechanical Rubber has developed detailed and effective programs to address human trafficking. This is a list of the actions Mechanical Rubber takes to combat human trafficking and forced labor in their operations, in the operations of their business partners, and elsewhere in their supply chains:

1. Involve company leadership.

Mechanical Rubber's leadership is committed to respecting human rights, including the eradication of human trafficking and forced labor. Leadership has supported the efforts and initiatives from the top down.

2. Identify business partners and geographies where the risk of human trafficking is present.

Mechanical Rubber continually monitors Governmental Agency's advisories regarding human trafficking and forced labor. We consider this information when deciding which companies and what regions of the world to do business with and in.

3. Develop and implement policies and programs to prohibit human trafficking.

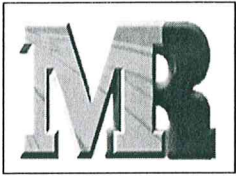
Mechanical Rubber has developed and implemented a zero-tolerance policy regarding Human Rights Violations, including Human Trafficking and Forced Labor. No human rights violation will ever be tolerated by an employee of Mechanical Rubber or one of its suppliers.

4. Implement training and awareness programs.

Mechanical Rubber has developed and implemented a training plan to increase awareness of human trafficking and forced labor. We educate our employees to help prevent human trafficking and forced labor by recognizing the signs of these criminal activities. We also encourage employees to be aware and look for these signs in their professional lives, as well as in their personal lives in their communities.

5. Require suppliers to certify compliance with company policies.

All Mechanical Rubber incoming materials are sourced through reputable organizations. All suppliers are vetted by our purchasing department before being added to our approved supplier list. Approved suppliers are continually monitored for performance as well as any type of violations that would constitute their removal from the list. All suppliers are required to agree to Mechanical Rubber's Supplier Terms and Conditions.



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6. Examine production planning and order placement practices.

Mechanical Rubber respects all human rights and aligns all operating procedures with this principle. The production and ordering procedures that are in place do not allow for any vulnerabilities to human trafficking or forced labor violations.

7. Implement policies prohibiting workers from paying recruitment fees.

Mechanical Rubber only utilizes traditional methods of attracting, recruiting, and hiring employees. No employee or perspective employees of Mechanical Rubber are required to pay any type of fees.

Cedric Glasper
President / CEO
Mechanical Rubber Products Co., Inc.

History of Anti-Human Trafficking and Forced Labor Legislation

According to the Office of the United Nations High Commissioner for Human Rights, human trafficking is prohibited as a violation of international human rights and as a type of economic crime. The most prominent of international laws prohibiting human trafficking is the U.N. Palermo Protocol. The law requires governments to implement the necessary actions to prevent trafficking, protect victims by rescuing them from traffickers, and punish and penalize traffickers. Governments are limited in their ability to investigate and combat human trafficking, which is why we believe that it is the obligation of all businesses in all industries to combat human trafficking.

In the U.S., the basis for the federal prohibition on human trafficking is the 13th Amendment to the U.S. Constitution, which abolished slavery and involuntary servitude. Pursuant to its obligations under the Palermo Protocol, the U.S. enacted the Trafficking Victims Protection Act (TVPA) of 2000. All 50 states and the District of Columbia have enacted some form of anti-trafficking legislation.

The California Transparency in Supply Chains Act requires covered companies to publicly disclose their efforts on avoiding, identifying, and eradicating forced labor from their business operations and supply chains.