
Keystone Engineering Inc.'s Disclosure Statement and Compliance Plan on Opposing Human Trafficking and Forced Labor in Federal Contracts

Keystone Engineering Inc. ("Keystone") is committed to conducting its business according to the highest ethical standards and in compliance with all applicable laws. All employees are expected to honor our commitment to integrity and ethical behavior in all matters relating to our business, at all times, everywhere in the world. We also expect our contractors, supplier, and other business partners to share our commitment to ethical and responsible business practices.

In keeping with this vital mission, we have adopted a corporate Policy on Human Trafficking and Forced Labor and are opposed to human trafficking and forced labor in any form, on any level, under any circumstance, anywhere in the world, including by our contractors and suppliers. Human trafficking is defined as the use of force, fraud, or coercion for the purpose of obtaining labor. As a federal contractor, we also are subject to Executive Order 13627 entitled, "Strengthening Protections Against Trafficking in Persons in Federal Contracts." The following are steps we take to guard against forced labor and human trafficking in our federal contracts and subcontracts and to ensure compliance with Executive Order 13627.

Recruitment of Employees

- We do not use recruiters who do not comply with local labor law or who charge employees for recruiting fees.
- We do not use misleading or fraudulent practices in recruiting employees or offering employment. All key terms and conditions of employment, including wages, benefits, the location of work, and, if applicable, living condition, housing, significant costs, and hazardous working conditions, are disclosed in a language employees can understand. All written documents provided to employees likewise are in a language they can understand.
- If any employees who are not nationals of the country where they are working were brought to that country for the purpose of working on a U.S. government contract or subcontract, we provide or reimburse the cost return transportation when their employment ends.
- If we provide or arrange for housing for employees working on U.S. government contract or subcontracts, we comply with all housing and safety standards of the host country.

Contract Certifications

All contractors and suppliers on any U.S. government contracts or subcontracts that involve the performance of services outside the United States or the provision of supplies acquired abroad (excluding commercially available, off-the-self items) and valued in excess of \$500,000 will be required to certify as a condition of doing business with us that they do not participate in, encourage, aid, or foster forced labor or human trafficking in any manner and that they comply with all applicable laws regarding human trafficking and forced labor.

Internal Accountability and Awareness Program

All Keystone employees, including those responsible for procurement and management of contractor/supplier relations, are instructed through our corporate Policy on Human Trafficking and Forced Labor and this Disclosure Statement and Compliance Plan to notify their direct supervisors or the Human Resources Department if they witness or receive credible information regarding a violation of Company policy and standards on forced labor and human trafficking by any Keystone employee or agent, by any contractor or supplier, or by any employee or agent of any contractor or supplier on any federal contract or subcontract.

Insuring Compliance

At present, we lack the resources to conduct independent, unannounced audits of contracts and suppliers regarding their compliance with our standards on human trafficking and forced labor. Thus, we rely on employee compliance with our corporate Policy on Human Trafficking and Forced Labor and the certifications we require, if applicable, from our contractors and suppliers to guard against human trafficking and forced labor in our federal contracts and subcontracts.

We will investigate any credible information regarding violations of our policy on human trafficking and forced labor that comes to our attention and take appropriate corrective action, including reporting violations to appropriate government authorities, to insure that no federal contract or subcontract we are awarded is tainted by human trafficking or forced labor.

This disclosure statement and compliance plan is intended to comply with Executive Order 13627 entitled, "Strengthening protections Against Trafficking in Persons in Federal Contracts".