

MODERN SLAVERY, FORCED LABOR & HUMAN TRAFFICKING POLICY

1. PURPOSE

Optimas is committed to conducting business in a manner that respects human dignity and prohibits modern slavery, forced or compulsory labor, human trafficking, and unlawful child labor. This Policy establishes the Company's principles and responsibilities for preventing, identifying, escalating, and responding to these risks in its operations and supply chain and supports compliance with applicable employment, import, supply-chain transparency, and reporting requirements.

2. SCOPE

This Policy applies to Optimas OE Solutions, LLC ("Optimas") and its operations, employees, officers, and directors. It also establishes expectations for suppliers, contractors, service providers, staffing agencies, recruiters, labor providers, and other business partners, as appropriate to the nature and risk of the relationship.

This Policy should be applied together with applicable local law and other Optimas policies and procedures. Where applicable law imposes additional or more specific requirements, those requirements must also be followed.

3. PROHIBITED PRACTICES

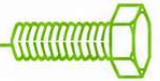
Optimas prohibits the knowing use of, participation in, or benefit from modern slavery, forced or compulsory labor, human trafficking, or unlawful child labor in its operations. Optimas also expects suppliers and other business partners to comply with applicable laws addressing these practices, and to abide by the following:

- Employment must be freely chosen. Forced, bonded, indentured, involuntary prison, slave, trafficked, or other involuntary labor is prohibited.
- Workers must be free to terminate their employment in accordance with applicable law and agreed employment terms.
- Workers must not be required to pay unlawful recruitment or placement fees as a condition of obtaining or retaining employment.
- Workers must not be required to surrender passports, government-issued identification, work permits, immigration documents, or similar personal documents as a condition of employment, except where temporary possession is lawfully required for a legitimate administrative purpose.
- Unreasonable restrictions on freedom of movement, physical confinement, threats, coercion, deception, or abuse intended to compel labor are prohibited.
- Unlawful child labor is prohibited. Employment of minors must comply with applicable minimum-age, education, working-hour, and hazardous-work restrictions and the Optimas Child Labor Policy.
- Workers must be treated humanely and must not be subjected to physical abuse, threats, unlawful harassment, intimidation, or other coercive or abusive treatment.

4. RESPONSIBLE RECRUITMENT & EMPLOYMENT PRACTICES

Optimas will maintain employment and recruitment practices designed to support lawful and voluntary employment in each country in which it operates. Human Resources and responsible business leaders will address employment eligibility, recruitment practices, working conditions, worker documentation, and other labor requirements in accordance with applicable law and Company procedures.

This Policy applies to Optimas' workforce and labor arrangements in every jurisdiction in which Optimas operates, including the use of staffing agencies, recruiters, contractors, or other labor providers. Particular attention should be given, as appropriate, to recruitment fees, worker documentation, freedom of movement, coercive practices, lawful employment of minors, and other indicators of forced or involuntary labor.



5. SUPPLIERS & RESPONSIBLE SOURCING

Optimas seeks to conduct business with suppliers and other business partners that operate lawfully, ethically, and responsibly. In determining whether to initiate or continue a business relationship with a supplier, Optimas will consider the following:

- Compliance with applicable laws concerning forced labor, human trafficking, child labor, wages, working hours, recruitment, and worker treatment;
- Policies and practices concerning responsible recruitment, labor providers, recruitment fees, worker documentation, freedom of movement, and grievance mechanisms;
- Countries, regions, commodities, materials, production processes, and tiers of the supply chain associated with the goods or services provided;
- Known government restrictions, enforcement actions, sanctions, forced-labor findings, entity lists, determinations, or other credible risk indicators relevant to the supplier or its supply chain;
- Ability and willingness to provide information reasonably requested by Optimas concerning origin, production, labor practices, manufacturing locations, or supply-chain traceability;
- Response to identified concerns and willingness and ability to implement appropriate corrective action; and
- Other legal, regulatory, customer, reputational, operational, or responsible-sourcing considerations relevant to the relationship.

The significance of any particular factor will depend on the circumstances, and no single factor necessarily determines whether Optimas will initiate, continue, restrict, suspend, or terminate a supplier relationship.

6. RISK BASED DUE DILIGENCE

Optimas will use a risk-based approach to forced-labor and human-trafficking due diligence. The nature and scope of due diligence may vary based on geography, commodity, supplier, product, manufacturing location, import activity, customer requirements, government guidance, identified concerns, and other relevant risk factors. Depending on the circumstances, due diligence may include:

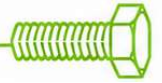
- Supplier questionnaires, certifications, contractual requirements, or acknowledgments;
- Review of supplier, product, country-of-origin, manufacturing-location, and supply-chain information;
- Screening against applicable government forced-labor restrictions, findings, entity lists, determinations, or other relevant compliance sources;
- Requests for supporting documentation concerning production, material origin, labor practices, or traceability;
- Supplier assessments or audits, where appropriate based on risk and available resources;
- Corrective-action plans, enhanced monitoring, or other risk-mitigation measures; and
- Escalation to Procurement/Sourcing, International Trade, Legal, Human Resources, EHS, Operations, or executive leadership, as appropriate.

This Policy does not represent that Optimas audits or independently verifies every supplier, business partner, product, facility, or tier of its supply chain. Due diligence measures will be selected based on applicable requirements and the circumstances of the identified risk.

7. IMPORT COMPLIANCE – UNITED STATES, CANADA & MEXICO

Optimas will comply with applicable laws restricting or prohibiting the importation of goods produced wholly or in part with forced or compulsory labor. Because Optimas imports goods into the United States, Canada, and Mexico, forced-labor risk is an import-compliance responsibility as well as a responsible-sourcing concern.

Procurement/Sourcing, working with Legal, International Trade, Operations, customs brokers, and other appropriate functions, will maintain processes reasonably designed to identify and respond to forced-labor import risks. Depending on the jurisdiction and risk, these processes may include supply-chain traceability, origin and manufacturer information, government-list or determination screening, supporting-document requirements, shipment review, escalation, and record retention.



For imports into Mexico, International Trade will account for applicable Mexican restrictions on goods produced wholly or in part through forced or compulsory labor, including forced child labor, and will monitor relevant determinations or restrictions issued by the Secretaría del Trabajo y Previsión Social (STPS). Appropriate Mexican personnel must promptly escalate any notice, inquiry, investigation, determination, or other communication from STPS, the Secretaría de Economía, customs authorities, or another governmental authority concerning forced-labor import restrictions.

Employees must promptly escalate information suggesting that goods imported or proposed for import by Optimas may be subject to a forced-labor restriction, detention, exclusion, seizure, denial of entry, or other government action.

8. RESPONSE & REMEDIATION

Where Optimas identifies or reasonably suspects a material forced-labor, human-trafficking, or unlawful child-labor concern involving its operations or supply chain, the Company will evaluate the concern and determine an appropriate response based on the circumstances.

- Requesting additional information, documentation, or supply-chain traceability;
- Conducting or requesting enhanced due diligence or an assessment;
- Requiring corrective action or an appropriate remediation plan;
- Restricting new business, suspending purchases or shipments, or changing sourcing arrangements while the matter is evaluated;
- Coordinating with customs authorities, labor authorities, regulators, customers, or other parties where legally required or appropriate;
- Considering impacts on affected workers when evaluating corrective or remediation measures; and
- Terminating a business relationship where warranted by the severity of the concern, the response of the party involved, contractual rights, and applicable law.

Optimas does not require automatic termination of a supplier relationship for every identified concern. The Company may consider whether corrective action or remediation can appropriately address the issue without creating additional harm to affected workers.

9. TRAINING & INTERNAL ACCOUNTABILITY

Optimas will provide training or awareness appropriate to employees and management whose responsibilities may materially affect forced-labor, human-trafficking, child-labor, sourcing, recruitment, or import-compliance risks. The nature, frequency, and audience for training may vary based on role, jurisdiction, risk, legal requirements, and Company program development.

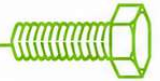
Employees and contractors acting on behalf of Optimas are expected to comply with applicable Company requirements. Violations may result in corrective or disciplinary action, up to and including termination of employment or engagement, consistent with applicable law and Company procedures.

10. SUPPLY CHAIN TRANSPARENCY & REPORTING

Optimas will comply with applicable supply-chain transparency and forced-labor reporting requirements, including requirements applicable to its business in California, Mexico and Canada.

Legal will coordinate with Procurement/Sourcing, International Trade, Finance, Human Resources, EHS, Operations, and other appropriate functions to determine required disclosures and to collect and validate information used in public reports or statements.

Public disclosures must accurately describe the Company's actual practices during the applicable reporting period. No employee should represent that Optimas conducts supplier audits, certifications, verification, training, remediation, or other due-diligence activities unless the statement is supported by the Company's actual practices and records.



Where required, Optimas will make applicable reports or disclosures publicly available and obtain governing-body approval, attestation, signature, or other authorization required by law. Statutory reports and disclosures will be addressed separately from this evergreen Policy.

11. PROGRAM EVALUATION & EFFECTIVENESS

Optimas will periodically evaluate its forced-labor and responsible-sourcing processes and may use appropriate measures to assess program effectiveness. Evaluation may consider identified risks, supplier responses, due-diligence results, import activity, government enforcement developments, training completion, corrective actions, reported concerns, and other relevant indicators.

The Company's processes may be revised as legal requirements, government guidance, supply-chain risks, customer expectations, and Company capabilities evolve.

12. RESPONSIBILITIES

- Executive Leadership supports the Company's commitment to preventing modern slavery, forced labor, human trafficking, and unlawful child labor and provides appropriate oversight and resources.
- Procurement/Sourcing incorporates appropriate responsible-sourcing considerations into supplier selection, contracting, due diligence, and supplier relationship management and escalates identified concerns.
- International Trade supports compliance with forced-labor import restrictions in the United States, Canada, Mexico, and other applicable jurisdictions, including government screening, supply-chain traceability, customs inquiries, and related import controls.
- Human Resources supports lawful recruitment and employment practices and addresses concerns involving Optimas employees, staffing agencies, recruiters, and labor providers within its area of responsibility.
- EHS supports relevant worker-health, safety, and responsible-business matters within its area of responsibility.
- Legal advises on applicable laws, disclosure and reporting requirements, investigations, contractual requirements, remediation, and escalation of material concerns.
- Business and Operations leaders support implementation of applicable controls within their areas of responsibility.
- All employees must comply with this Policy and promptly report known or suspected violations or material concerns.

13. REPORTING & NON-RETALIATION

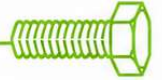
Employees who become aware of or reasonably suspect modern slavery, forced labor, human trafficking, unlawful child labor, or a related supply-chain concern should promptly report the matter to their manager, Human Resources, Legal, Trade Compliance, EHS, Procurement/Sourcing, or another available Company reporting channel, as appropriate. Employees should not independently investigate or confront a supplier, worker, recruiter, or other person regarding a suspected violation unless directed to do so by the appropriate Company function.

Optimas prohibits retaliation against any person who raises a good-faith concern, reports a suspected violation, or participates in an investigation.

14. RELATED POLICIES

This Policy should be read together with applicable Optimas policies and requirements, including, as applicable:

- Human Rights Policy;
- Child Labor Policy;
- Responsible Business & Sustainability Policy;
- Health & Safety Policy;
- Code of Conduct;
- Supplier and responsible-sourcing requirements;
- International Trade policies and procedures; and



- Applicable employment, anti-retaliation, and reporting policies.

15. QUESTIONS

Questions regarding this Policy should be directed to the Legal Department, International Trade, Human Resources, EHS, or Procurement/Sourcing, as appropriate.