

Effective: December 13, 2018; amended March 28, 2019

Anti-Slavery and Human Trafficking Policy

Purpose

To establish requirements for compliance with the United States Government’s policy prohibiting trafficking in persons and trafficking-related activities.

Applicability

Triumph Group Inc. (“Triumph”) employees, the Board of Directors, others who represent or act for us (collectively “Representatives”), must comply with this policy and FAR 52.222-50 as applicable by contract. In addition to complying with this Global Policy, entities within Triumph which are incorporated in the UK or which carry on business in the UK are required to comply with the Anti-Slavery and Human Trafficking Policy contained in Annex 1 to this Global Policy.

United States policy

The United States has adopted a policy prohibiting trafficking in persons including trafficking-related activities. The United States implements this policy, in part, via its procurement practices. The United States includes in certain contracts the clause at Federal Acquisition Regulation 52.222-50, Combatting Trafficking in Persons. That clause imposes various requirements on Triumph and its Representatives.

The Federal Acquisition Regulation requires that this clause be included in all prime contracts with Federal agencies and in subcontracts thereunder. Regardless of whether the clause is, in fact, included in a particular contract, Triumph has determined to comply with the requirements, and to require Representatives to comply with the requirements.

Requirements on Triumph Representatives:

Triumph Representatives shall not:

- i. Engage in trafficking in which a commercial sex act is induced by force, fraud or coercion, or in which the person induced to perform such act is younger than 18 years of age. (Triumph Representatives shall not engage in such trafficking regardless of whether the activity is legal in the country in which the activity takes place.)
- ii. Procure a sex act in return for money or other things of value. (Triumph Representatives shall not engage in such activity regardless of whether the activity is legal in the country in which the activity takes place.)
- iii. Recruit, harbor, transport or obtain a person for labor or services through force, fraud or coercion.
- iv. Employ the services of any person who has been induced to work via threats of serious harm or physical restraint.
- v. Destroy or confiscate any employee’s identification or immigration documents.
- vi. Recruit employees via misleading or fraudulent practices.
- vii. Charge applicants for employment or employees’ recruitment fees.
- viii. Fail to provide return transportation to employees who Triumph has transported from remote sites to work for Triumph.

ix. If Triumph provides housing for employees, provide substandard housing.

Triumph Representatives shall immediately notify the Triumph Hotline if they become aware of any violation of the above prohibitions.

Triumph Representatives failing to adhere to the above requirements will be subject to disciplinary action up to and including termination of employment, contract or other association.

Requirements on Triumph procurement personnel

Procurement personnel shall:

- i. Include the clause at FAR 52.222-50, Combatting Trafficking in Persons in all subcontracts under Federal prime contracts.
- ii. Not execute any agreement for the recruitment of employees with any company, agency, etc. without the prior approval of the Triumph General Counsel.

Requirements on Hotline Manager

The Hotline Manager shall advise the Triumph General Counsel of any reports of violations of the above requirements so that such reports can be properly investigated.

ANNEX 1

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. Policy Statement

- 1.1. The crime of modern slavery, which takes many forms including servitude, forced labour and human trafficking, is a fundamental violation of human rights and Triumph Group, Inc. and all of its subsidiaries (“Triumph Group”) take a zero tolerance approach to this abhorrent crime in all its various forms.
- 1.2. Modern slavery is a global issue which is notoriously difficult to detect and which can affect any business in any sector. Triumph Group recognises and takes very seriously the risk of modern slavery and is committed to implementing and enforcing effective systems and controls in an attempt to ensure that these criminal practices are not taking place anywhere in its own business or supply chain. Triumph Group is engaged in an ongoing process of reviewing, improving and strengthening its systems and controls in this regard.
- 1.3. Triumph Group endeavours to act ethically and with integrity in its business dealings and relationships and is striving to ensure that there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chain, consistent with its disclosure obligations under the Modern Slavery Act 2015.
- 1.4. In respect of the issues of modern slavery, Triumph Group expects its contractors, suppliers and other partners to meet the same high standards by which Triumph Group operates and to conduct their businesses in accordance with Triumph Group's core values in this respect. Triumph Group expects its suppliers to hold their own suppliers to the same high standards.
- 1.5. This policy applies to all persons working for, on behalf of or in association with Triumph Group in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners.
- 1.6. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the Policy

- 2.1. The board of directors of Triumph Group, Inc. has overall responsibility for endorsing and supporting this policy and the commitments it contains.
- 2.2. Implementation of this policy, including monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to endeavour to ensure they are effective in countering modern slavery is managed by various departments within the business, including Supply Chain, Human Resources and Legal.
- 2.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery as it relates to Triumph Group's business, supply chain and generally.
- 2.4. Comments, queries and suggestions for how this policy can be improved are encouraged. Individuals can address these to their manager (if they are employed by Triumph Group), or alternatively can address them to Triumph via the anonymous Ethics Hotline (+1-800-535-5581), or by submitting a report at <https://secure.ethicspoint.com/domain/media/en/gui/59231/index.html>.

3. Compliance with the Policy

- 3.1. All those to whom this policy applies must ensure they read, understand and comply with this policy.
- 3.2. The prevention, detection and reporting of modern slavery in any part of Triumph Group's business or supply chain is the responsibility of all those working for Triumph Group or under its control.

- 3.3. All those working for Triumph Group, or under its control, are encouraged to notify their manager (or an alternative trusted person of equivalent seniority) as soon as possible if they believe or suspect that a breach of this policy has occurred, or may occur in the future, or if they have concerns about any issue or suspicion of modern slavery in any part of Triumph Group's business or supply chain. Notifications can also be made to Triumph's anonymous Ethics Hotline (+1-800-535-5581), or by submitting a report at <https://secure.ethicspoint.com/domain/media/en/gui/59231/index.html>.
- 3.4. If any person working for Triumph Group, or under its control, has concerns but is unsure about whether or not the facts they are aware of constitute any of the forms of modern slavery, they should raise this with their manager or a trusted person of equivalent seniority.
- 3.5. Those who do not work for, or under the control of, Triumph Group but to whom this policy applies pursuant to paragraph 1.5 above are encouraged to report any concerns relating to the presence of modern slavery in Triumph Group's business or supply chain to Triumph's anonymous Ethics Hotline (+1-800-535-5581), or by submitting a report at <https://secure.ethicspoint.com/domain/media/en/gui/59231/index.html>.
- 3.6. In appropriate cases, Triumph Group will advise and support its suppliers and business partners in the event instances of modern slavery, or shortcomings in their approach to combatting modern slavery, are identified.
- 3.7. Where such advice and support is provided by Triumph Group, the welfare and safety of local workers will always be Triumph Group's priority.
- 3.8. Triumph Group aims to create an environment of openness and candor within its business and will support any person who raises genuine concerns in good faith under this policy, even if those concerns turn out to be mistaken.
- 3.9. Triumph Group is committed to ensuring that no one suffers any detrimental treatment as a result of reporting concerns relating to the presence of modern slavery in its business or supply chain in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or any other unfavourable treatment connected with raising a concern.
- 3.10. If an individual working for Triumph Group, or under its control, believes they have suffered any such detrimental treatment, they should inform their manager (or an alternative trusted person of equivalent seniority) immediately. If the matter is not remedied, they should raise it formally using the applicable grievance procedures, or via the Ethics Hotline (+1-800-535-5581), or by submitting a report at <https://secure.ethicspoint.com/domain/media/en/gui/59231/index.html>.
- 3.11. If an individual who does not work for, or under the control of, Triumph Group but to whom this policy applies pursuant to paragraph 1.5 above, believes they have suffered any such detrimental treatment, they should inform Triumph via the Ethics Hotline (+1-800-535-5581), or by submitting a report at <https://secure.ethicspoint.com/domain/media/en/gui/59231/index.html>. In the event such a communication is made, Triumph Group will endeavor to investigate the issue but ultimately may be unable (or decide it is not appropriate) to take any action.

4. Communication and Awareness of this Policy

- 4.1. Triumph Group's zero-tolerance approach to modern slavery should be communicated to all suppliers, contractors and partners at the outset of Triumph Group's business relationship with them and reinforced as appropriate thereafter.
- 4.2. This policy is made available on Triumph's intranet site and supplier portal and is available upon request from members of Triumph's managerial staff.

5. Breaches of this Policy

- 5.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2. Triumph Group may terminate its relationship with other individuals and organisations in the event they breach this policy.