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## ***Anti-Slavery and Human Trafficking Statement*** ***Powell Company Policy***

***Version 2.0***

<b>Effective Date</b>	June 1, 2020	<b>Supersedes</b>	Version 1.0
<b>Author</b>	Bob Callahan, Chief Human Resources Officer		
<b>Approvals</b>	Brett Cope, President & CEO		
<b>Purpose</b>	Powell is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. Powell will not tolerate or condone human trafficking or slavery in any part of our global organization.		
<b>Scope</b>	This Policy applies to all persons employed by or engaged to provide services to Powell, including, but not limited to, Powell's employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Policy, "employees").		

Powell Industries Inc. ("Powell") is a supplier of highly complex and integrated systems for distribution and control of electrical energy and other critical processes. Powell was founded in 1947 and is headquartered in Houston, Texas.

### **Powell's Commitment**

Wherever it does business around the world, Powell is committed to conducting that business with honesty and integrity: treating all people with dignity and respect and complying with applicable laws, regulations and treaties. Powell considers our supply base as a direct extension of our Company – one that projects our core values of Customer First, Respect for Employees, a "Can-Do" Attitude and a Commitment to Improve. Through collaboration with our business partners, we enhance supplier relationships to create a sustainable supply chain in compliance with all laws and regulations.

Powell is also committed to protecting and promoting human rights globally. Powell does not tolerate illegal child labor, forced labor, or any use of force or other forms of coercion, fraud, deception, abuse of power or other means to achieve control over another person for the purpose of exploitation. Powell respects international principles of human rights including, but not limited to, those expressed in the United Nations (UN) Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights, the International Labor Organization's Fundamental Conventions, the US Victims of Trafficking and Violence Protection Act, US Forced Labor prohibitions, the UK Modern Slavery Act, and the California Transparency in Supply Chains Act. These principles and commitments are embodied in the way Powell does business. Powell



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strives to comply with the laws of every country in which it operates and expects those with whom it does business to do the same. Powell is in the process of formalizing policies and procedures to directly address prevention of human trafficking and slavery in our supply chain.

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires certain retail sellers and manufacturers doing business in California to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains. Compliance with the Act requires Powell to disclose, to what extent, if any, it does the following:

1. **Verification.** Powell routinely assesses risk related to its supply chain. This assessment is based primarily upon supplier quality, service, performance, the type of transaction, the specific commodity purchased, the geographic location of the source and other relevant business and legal criteria. Powell follows, and requires that our suppliers follow, the trade laws of the US and applicable laws of countries in which it operates, including the restrictions on export or doing business with certain people, companies or countries.
2. **Audits.** While Powell has conducted routine audits of supplier’s compliance with the terms of the contract, or assessments of supplier performance, those assessment methodologies do not currently include intentional assessments of human trafficking and slavery. Powell conducts risk based evaluations and audits of suppliers, which may include evaluation of efforts to prevent human trafficking and child-labor, as well as anti-bribery, prevention of sourcing Conflict Minerals from Conflict Mines, and other compliance and safety risk factors.
3. **Certifications.** Powell contracts with suppliers and expects suppliers to comply with all laws, including without limitation, those pertaining to anti-slavery and human trafficking (UN Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights, the International Labor Organization’s Fundamental Conventions, the US Victims of Trafficking and Violence Protection Act, US Forced Labor prohibitions, the UK Modern Slavery Act, and the California Transparency in Supply Chains Act).

Suppliers agree to these conditions when accepting a Powell Purchase Order:

Link to Powell’s Terms and Conditions for Purchase Orders (select appropriate terms based on purchasing country):

<https://www.powellind.com/OurCompany/Pages/Supply-Chain.aspx>

4. **Internal Accountability.** Powell employees are, under the terms of their employment, expected to follow all laws of the countries in which they operate and all of Powell’s policies and workplace rules. Employees who violate laws or Powell’s policies are subject to disciplinary action, up to and including discharge. Powell reserves the right to terminate relationships with suppliers who fail to comply with law and/or whose contractual noncompliance is not addressed in a timely manner.

5. **Training.** Powell trains its employees in the standards of ethical behavior, policies, procedures and legal requirements that establish the manner in which it conducts business.
6. **Monitoring.** Powell encourages employees, suppliers and outside parties to report any compliance concerns by calling the Company's toll-free hotline, EthicsPoint, at 877.217.4661 (inside the US and Canada) or 001.877.217.4661 (outside the US and Canada) or report concerns online at <https://powellind.ethicspoint.com> to have a qualified representative to respond.



Brett A. Cope  
President & Chief Executive Officer  
Powell Industries Inc.