

Transparency in Supply Chains Disclosure

At **Heil Trailer International, Co.**, we are strongly opposed to the use of forced, bonded, involuntary, prison or indentured labor. At Heil Trailer International, we are constantly evaluating our supply chain to assess various compliance risks, including those related to slavery and human trafficking. The following information describes our company's efforts to date and our future plans to eradicate slavery and human trafficking from our supply chain:

- As a supplement to our ongoing compliance training programs, we will, beginning in 2012, implement training for our supply chain personnel focusing specifically on slavery and human trafficking issues and ways to mitigate, to the greatest extent possible, these elements from our supply chain.
- We are educating our suppliers and recently adopted the Heil Trailer International Supplier Code of Conduct [\[link\]](#) which addresses our commitment to seek out business partners who share our values and specifically prohibits our suppliers from using forced, bonded, involuntary, prison, or indentured labor.
- Heil Trailer International's Code of Business Conduct and Ethics requires our employees to comply with employment-related laws, including those related to wages, hours, and minimum age requirements. Our Code of Business Conduct and Ethics and our use of the Supplier Code of Conduct are important steps in gaining supplier compliance.
- We take violations of our Codes very seriously. For example, violations of the Supplier Code may result in termination of the supplier relationship, while violations of the Code of Business Conduct and Ethics may result in termination of employment.
- While we are not currently verifying, auditing or requiring our suppliers to certify that their products and services comply with local laws regarding slavery and human trafficking, we will continue to assess our supply chain for areas of improvement in eradicating slavery and human trafficking, and will continue to expect our suppliers and employees to do the same.