CMCO Combatting Human Trafficking Compliance Plan

Purpose

Columbus McKinnon Corporation and its affiliates (herein also referred to as the "Company), is committed to respecting the human rights and dignity of everyone. We will not tolerate abuse of human rights in our operations or in our supply chain. We are committed to adhering to all applicable employment and labor laws everywhere we operate. We comply with all applicable laws and international standards pertaining to fair employment practices, forced and compulsory labor, child labor, employment discrimination and human trafficking including the Universal Declaration of Human Rights, the International Labour Organization's core standards and the UK Modern Slavery Act. No employee nor any company agent, subcontractor, vendor, or supplier shall
solicit, obtain, or be involved in such activities.

This Combating Human Trafficking Compliance Plan (the "Plan") is meant supplement the Company's policies pertaining to human rights and human trafficking and to be a practical resource and a compliance plan for applicable human trafficking laws and regulations that impact the Company's business practices. The purpose of this Plan is to ensure that the Company's employees and its, contractors, subcontractors, suppliers, agents, and other third-party representatives (collectively, "Business Partners") comply with applicable Company policies and human trafficking laws and regulations globally. The Plan is designed to ensure that Company employees and Business Partners are aware of what kinds of conduct are prohibited and the potential consequences of such violation. This Plan applies globally to all employees, officers, and directors of the Company and any third party acting on the Company's behalf.

Policy

Columbus McKinnon Corporation has a zero-tolerance approach towards human trafficking and requires that all Company employees, officers, and directors and any third party acting on behalf of the Company comply fully with applicable human trafficking laws and regulations. The Company's policies regarding Human Trafficking and Human Rights are located in the Company's Code of Business Conduct and Human Rights Policy.

Prohibited Activities Under Federal Acquisition Regulation (FAR) 52.222-50:

In accordance with Federal Acquisition Regulation (FAR) 52.222-50, the Company has developed this Plan to be implemented on United States Government contracts or subcontracts for supplies, other than commercially available off-the-shelf ("COTS") items, acquired outside the U.S. or services to be performed outside the U.S. and has an estimated value that exceeds $550,000. The Company fully supports the U.S. Government's policy prohibiting trafficking in persons, and strictly prohibits its employees and all subcontractors, vendors, suppliers and agents from:

a) Engaging in any form of trafficking in persons during the period of performance of the contract;
b) Procuring commercial sex acts during the period of performance of the contract;
c) Using forced labor in the performance of the contract;
d) Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
e) Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language understood by the employee or potential employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including

wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee or potential employee, and, if applicable, the hazardous nature of the work;

f) Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
g) Charging employees and potential employees' recruitment fees;
h) Failing to provide return transportation or pay return transportation costs upon the end of employment, for certain employees who are not nationals of the country in which the work is taking place (with some exceptions as specified under FAR 52.222-50(b)(7);
i) Providing or arrange housing that fails to meet the host country housing and safety standards; or
j) If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

Compliance Plan

This Plan is designed as a standard Plan which, at minimum, presumptively applies to all U.S. Government contracts and subcontracts which have an estimated value exceeding $550,000, and are for either: (1) supplies, other than commercially available off-the-shelf items, acquired outside the U.S.; or (2) services to be performed outside the U.S.

a) Employees Awareness & Training

The Company's Code of Business Conduct and Human Rights Policy set forth the Company's policies and zero-tolerance stance towards human trafficking related activities. This Plan, the Company's Code of Business Conduct and Human Rights Policy are publicly available on the Company's website and are made available to all Company employees via the Company's Intranet. All new Columbus McKinnon employees are required to read and sign a written acknowledgement of the Code Business of Conduct. The Company also requires all employees to review and sign off on the Company's Code of Business Conduct annually.

The Company offers additional training for employees with direct responsibilities in recruiting and hiring and in supply chain management to increase their awareness of the risks of slavery and human trafficking and ways to mitigate those risks.

b) Risk Assessment

The Company is committed to our zero-tolerance policy towards human trafficking and assesses the risks of human trafficking in our business and supply chain by identifying areas where our business and supply chain may be vulnerable to slavery, human trafficking and forced labor and taking steps to mitigate those vulnerabilities. We have implemented standard recruiting and hiring processes at all our sites, globally, train employees on the process and have validation processes to ensure compliance with legal requirements as part of our employee onboarding procedures. Our processes and training are documented in an internal record-keeping system.

We also evaluate and mitigate supplier risk in through our supplier onboarding process which requires new suppliers to complete a supplier questionnaire and acknowledge our Terms of Purchase, Human Rights Policy, Company Code of Business Conduct, Supplier Code of Conduct, and this Plan.

c) Recruitment, Wages & Housing

The Company has a compensation approach to provide competitive compensation compared to similar industries, organizational size, and geographic market. The Company has global compensation guidelines for our domestic and international locations in compliance with the laws and regulations regarding recruitment and wage plans, including minimum wage requirements. The Company will provide employees with at least the minimum wage required by law and provide benefits and overtime compensation in compliance with applicable laws. The Company prohibits using misleading or fraudulent practices to recruit employees, such as failing to use language that is understandable to workers or failing to disclose basic information regarding the key terms and conditions of employment and, if applicable, potentially hazardous work conditions.

The Company permits only the use of recruitment and staffing companies that ensure compliance with local labor laws, and ensures wages meet applicable legal requirements.

If any worker is provided housing by the Columbus McKinnon Corporation, the Company will ensure that the housing provided meets or exceeds host-country housing and safety standards.

d) Third-Party Compliance

All suppliers and third parties of the Company are required to fully comply with Company policies and all applicable laws and regulations. As part of the Company's onboarding process, our suppliers are provided with our Supplier Code of Conduct, Company's Code of Business Conduct and Human Rights Policy, all of which specifically prohibit all forms of slavery, human trafficking and force labor. Additionally, new suppliers are required to complete our supplier self-audit questionnaire that requires them to answer questions specifically regarding human trafficking and all forms of forced labor. Suppliers are provided and required to acknowledge receipt and understanding of this Plan.

e) Reporting Methods & Disciplinary Actions

Company employees have an obligation to speak up if they see or suspect conduct that creates the risk of a legal or ethical violation. This can always be done anonymously. Any employee or Business Partner of the Company who has questions about the Plan or would like to confidentially report a potential violation of the Plan, they are encouraged to contact:

- their Supervisor/Manager,
- the Human Resources department,
- the Legal Department,
- other individuals identified in corporate policies and procedures, or
- the EthicsPoint Website

Activities inconsistent with this Plan and any of our policies related to the prohibition of trafficking in persons can be reported, without fear of retaliation. Please refer to the Company's

Code of Business Conduct for more detailed information on how to report policy violations.

If any employee, agent, vendor, supplier or subcontractor is found to have engaged in such behavior, the Company will immediately investigate the matter and take appropriate action, up to and including termination of employment, or termination of the third-party relationship. The Company will also report prohibited activities and any actions taken against an employee, agent, supplier, vendor or subcontractor to the Contracting Officer and the agency Inspector General, as required by FAR 52.222-50.

f) Plan Maintenance & Location

This Plan is maintained by the Company's Legal Department. It is reviewed and updated periodically, as needed. The Plan is available via the Company's Supplier Registration Web Page and the Company's Intranet for active employees.