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<b>ANTI-TRAFFICKING IN PERSONS POLICY</b> Issued: 05/30/2017			

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**1.0 Introduction**

Constellis Holdings, LLC and its affiliates (herein, “Constellis” or the “Company”), are committed to conducting business honestly, ethically, and in accordance with all applicable laws and regulations of the United States, the United Kingdom, and the other countries and jurisdictions in which they operate. Human trafficking is modern-day slavery and involves the use of force, fraud, or coercion to obtain some type of labor or commercial sex act. All forms of human trafficking are a violation of human rights, which are inherent to each person and exist independent of state recognition and regardless of nationality, sex, national or ethnic origin, color, religion, language, or any other status. As an international company, Constellis is committed to the eradication of human trafficking. Accordingly, similar to the U.S. Government, Constellis has adopted a “zero tolerance” policy for trafficking in persons and will not tolerate the practice in any form. Any employee or third party acting on behalf of the Company who directly or indirectly engages in human trafficking will be immediately terminated, and their actions will be reported

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to the appropriate authorities for prosecution. Any actions by a Company employee or third party working on behalf of the Company that appear to violate this Policy must be immediately reported to the Chief Legal Officer (“CLO”) or his or her designee.

The purpose of this Policy is to establish the Company’s procedures for compliance with anti-human trafficking laws and to outline prohibited activities. This Policy further demonstrates the Company’s commitment to ethical conduct, compliance with all applicable laws, and strong corporate governance, all of which should be a source of pride for our employees and clients. If you have any questions or concerns related to this Policy, please contact the Legal Department.

## **2.0 Scope and Applicability**

This Policy applies to all Company employees and third parties working on behalf of the Company anywhere in the world, as well as to joint ventures and other subsidiaries and affiliates of the Company. All Company personnel are responsible for ensuring this Policy is understood and implemented consistently with these requirements.

## **3.0 Prohibited Activities**

Constellis has a **zero tolerance policy** for Company employees or third parties working on its behalf engaging in any form of human trafficking. Company employees and third parties are strictly prohibited from engaging in a broad range of trafficking-related activities, which include but are not limited to the following:

- Engaging in severe forms of trafficking in persons;
- Procuring commercial sex acts;
- Using forced labor;
- Destroying, concealing, confiscating, or otherwise unreasonably denying access by an employee to the employee’s identity documents, such as passports or driver’s licenses;
- Using misleading or fraudulent recruitment practices during the recruitment of employees;
- Using recruiters that do not comply with local labor laws;
- Charging applicants or employees “recruitment fees” or other “fees” in order to gain employment;
- Providing or arranging housing that fails to meet the host country and safety standards;
- Failing to provide a written employment contract, recruitment agreement, or similar work paper, if required by law or contract, in a language the employee understands at least five days before the employee departs from his or her country of origin; and
- Failing to provide or pay for the cost of return transportation costs upon the end of employment for employees who were brought into a country for the purpose of working on a U.S. government contract or subcontract.

Any employee or third party acting on behalf of the Company who directly or indirectly engages in human trafficking-related activity will be immediately terminated, and their actions will be reported to the appropriate authorities for prosecution.

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#### **4.0 Awareness Program**

The Company maintains an awareness program to ensure all of our employees and third parties working on the Company’s behalf are aware of the Company’s policies regarding human trafficking and of the disciplinary actions that will be taken against employees and consequences for subcontractors for any violations, as well as reporting obligations. The three ways the Company promotes awareness is through publication and promotion of policies, mandatory human trafficking training, and regular human trafficking-related communications.

##### **4.1 Corporate Policies**

The Company’s awareness program starts with our corporate policies. We have anti-human trafficking-related requirements set forth in our enterprise-wide Human Rights Policy, this Anti-Trafficking in Person Policy, and our Code of Business Ethics and Conduct. In the two policies, the Company describes the prohibited human trafficking activities, the Company’s zero tolerance policy towards trafficking, and the reporting obligations of our personnel. All employees are required to attest that they have read and understand our Code of Business Ethics and Conduct as a condition of employment. Our Code of Business Ethics and Conduct and this Anti-Trafficking in Persons Policy are also provided and attested to by appropriate subcontractors and vendors.

##### **4.2 Anti-Human Trafficking Training**

Constellis’ anti-human trafficking training consists of information on what human trafficking is, an explanation of the Company’s and U.S. Government’s Zero Tolerance policies towards trafficking, the Company’s policies and procedures, and reporting obligations and customer requirements. Both in-person and electronic training are available to accommodate each particular audience. Annual human trafficking training is mandatory for all Company personnel. Electronic training is also provided to all appropriate subcontractors and vendors.

##### **4.3 Communications**

Communications regarding human trafficking and the importance of compliance in this area are periodically sent to our employees. The information is disseminated through compliance communications and is provided in a variety of formats, which may include CEO Messages, compliance announcements, policy reminders and briefings, human trafficking posters, and other information distributed throughout and posted in appropriate workspaces.

##### **4.4 Human Rights Impact Assessments**

Constellis has a responsibility to conduct due diligence to identify, prevent, and mitigate any direct or indirect promotion of human trafficking. At the request of the Legal and Compliance Department, certain projects and departments within Constellis may be required to conduct annual Human Rights Impact Assessments (HRIAs). HRIAs involve detailed examination of contract requirements, personnel practices, and on-the-ground realities in the place of performance to ensure none of our work in any way contributes to a violation of human rights, including human trafficking.

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## **5.0 Reporting Suspected Human Trafficking Violations**

Employees or third parties working on behalf of the Company must report any suspected activity that violates the Company’s zero tolerance policy for human trafficking or otherwise violates the Trafficking Victims Protection Act or any other applicable law or regulation establishing restrictions on trafficking in persons, the procurement of commercial sex acts, or the use of forced labor. The Company will notify the appropriate authorities if the Company receives any credible information from any source that alleges Company employee(s) or third parties working on the Company’s behalf have violated the zero tolerance policy or otherwise engaged in any form of trafficking.

To report a suspected human trafficking violation, employees and third parties can report it to their supervisor, to the CLO, or using, anonymously if necessary, the Constellis Ethics Hotline via the web at [constellis.ethicspoint.com](http://constellis.ethicspoint.com) or through the following telephone numbers:

- In the United States & abroad: personnel and third parties can dial **1-844-637-6751**.
- In Iraq: personnel and third parties can make a reverse charge or collect call to the United States using the following number: **001-5033526174**. All reverse charge or collect calls will be accepted by the contact center using an automated English message.

The U.S. Government also requires the Company to provide its personnel with contact information for the Global Human Trafficking Hotline: its telephone hotline at **1-844-888-FREE** and its email address at [help@befree.org](mailto:help@befree.org). If the individual reports allegations of trafficking directly to the authorities, they should also inform the CLO or his or her designee of the report to ensure the Company’s obligations under governing federal regulations are met. The Company’s Anti-Retaliation & Whistleblower Policy and its Open Door Policy protect any employees that report suspected human trafficking from any forms of retaliation.

## **6.0 Internal Controls**

### **6.1 Recruitment and Wages**

The Company’s recruitment process is primarily handled through the Recruiting and Operational Support Services Department and will be performed in accordance with the Company’s ethical obligations and this Policy. If the Company uses a third party to source personnel, that third party must comply with the local labor laws of the country in which the recruiting takes place and must have trained employees who are familiar with the prohibited activities listed in section 3.0. All third party recruiters will certify that they will abide by Company Policies.

All Company employees’ wages will at least meet the minimum wage requirements in the host country where they will be performing their work. At the time of contract mobilization, and periodically thereafter, the wages of Company employees will be compared to the wages of other employees in the countries in which they work to ensure that each contract meets the requirements set forth in this section.

### **6.2 Housing**

If the Company provides or arranges for employee housing, the Company will maintain appropriate housing based on contract and host country housing, safety, and legal requirements. If the housing is

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provided or arranged by the U.S. Government, the Company will periodically inspect and review housing to ensure that all Company employees are housed in a safe environment.

### 6.3 **Monitoring**

The CLO, or his or her designee, will engage in periodic monitoring activities, including audits and questionnaire completion, to ensure this Policy is being followed by all employees and third parties, to detect and prevent violations of this Policy, and to help ensure this Policy is appropriately designed to address human trafficking-related risks. These monitoring activities will be supported by Program and business unit personnel and may include broader reviews of compliance with the requirements set forth in this Policy throughout a Program or business unit or targeted reviews intended to ensure that specific requirements are being met.

## 7.0 **Subcontractor Controls**

### 7.1 **Subcontractor Vetting**

If a Subcontractor will be retained to assist with the recruiting of personnel or will have employees working on their behalf to recruit personnel, the Company requires that the subcontractor undergo a vetting process that includes an independent due diligence review through the Legal Department. Additionally, all third party recruiting companies that place personnel must undergo a Level III due diligence review, or its equivalent, before a subcontract agreement can be established. This due diligence review will be performed in accordance with the Third Party Due Diligence Policy.

### 7.2 **Certification and Subcontractor Compliance Plan**

All subcontractors with a contract valued over \$500,000 and performing work outside of the U.S. will be required by contract to agree to fully comply with FAR 52.222-50, *Combating Trafficking in Persons*. Before awarding the subcontract, and annually thereafter, the subcontractor must certify that neither it nor its subcontractors or agents have engaged in any human trafficking-related activities, and that if any abuses have been identified the subcontractor has taken the appropriate remedial and reporting actions. In addition, before an award is made, and annually thereafter, the subcontractor must provide the Company with a copy of their human trafficking compliance plan that meets the standards set forth in FAR 52.222-50 and/or certify compliance with this Policy. The Company, in its contractual terms, reserves the right to require the subcontractor to provide reasonable evidence of its compliance with the statements set out in the subcontractor's certification and compliance plan.

### 7.3 **Subcontractor Audits**

Subcontractors or other third parties working on behalf of the Company must agree to ongoing monitoring and/or audits for human trafficking violations. During these reviews, the Company will employ various methods to prevent and detect

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human trafficking, to include, but not limited to, interviews with employees, employee file audits, housing audits, and employment agreement audits.

The frequency of these reviews will be determined by the CLO, or his or her designee, who will assess the overall risk of human trafficking activity based upon the location of the work, the size and complexity of the work being performed, and the nature and scope of the subcontractor’s activities.

### **8.0 Department of Defense Contracts**

For non-commercial Department of Defense (“DoD”) contracts with a value exceeding \$5M, the Company and third parties working on behalf of the Company shall:

- Prominently display the DoD Combating Trafficking in Persons and Whistleblower Protection hotline posters in employee work spaces in English and in any foreign language(s) spoken by a significant part of the workforce. Provide and post a document explaining employee rights in employee workspaces in English and any foreign languages spoken by a significant portion of the workforce. This posting will outline the Company’s commitments to combatting human trafficking and detailing the rights afforded to all Company employees.

### **9.0 Potential Violations and Discipline**

Any employee or third party acting on behalf of the Company who directly or indirectly engages in human trafficking-related activity will be immediately terminated, and their actions will be reported to the appropriate authorities for prosecution.

### **RELATED DOCUMENTS**

- **Code of Business Ethics and Conduct**
- **Human Rights Policy**
- **Anti-Retaliation and Whistleblower Policy**
- **Third Party Due Diligence Policy**

### **VERSION HISTORY**

	<b>Version</b>	<b>Version Date</b>	<b>Author</b>	<b>Description</b>
1	1.0	05/30/2017	Melissa Taylormoore	Initial version
2	1.1	08/28/2017	Chris Glover	Minor updates throughout
3	2.0	03/01/2019	Todd Rouse	Updated information regarding Compliance activities and training, recruitment, housing, and subcontractor monitoring
4	2.1	10/26/2020	Todd Rouse	Update to Section 5.0
5	2.2	09/09/2021	Todd Rouse	Minor revisions throughout