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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’s and its affiliates’ (herein, “Constellis” or the “Company’s”), 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 slavery that forces individuals into labor or sexual servitude. 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 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 her or his designee.

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The purpose of this Policy is to establish the Company’s procedures for compliance with anti-human trafficking laws. 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. Please review this Policy and contact the CLO or his or her designee if you have any questions or concerns.

## **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 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 are third parties strictly prohibited from engaging in 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 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 employees “recruitment fees”;
- 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 the employee’s native language 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.

## **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 and the U.S. Government’s zero tolerance policy regarding human trafficking. It also includes creating awareness 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 such violation, as well as the reporting obligations. The three ways the Company promotes awareness is through policies, 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 Code of Business Ethics and Conduct and this Policy.

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In these 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.

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

The training consists of information on what human trafficking is, explanation of the Company's and U.S. Government's Zero Tolerance policy towards trafficking, the Company's policies and procedures, reporting obligations and customer requirements. Both in-person and electronic training are available to accommodate the intended audience. Annual human trafficking training is mandatory for all Company personnel.

#### **4.3 Communications**

Communications regarding human trafficking and the importance of compliance in this area are periodically sent to our employees. These communications are sent out through compliance communications and are provided in different formats that may include CEO Messages, compliance announcements, and human trafficking posters.

### **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, the CLO, or report, anonymously if necessary, using the Constellis Ethics Hotline via the web at [constellis.ethicspoint.com](http://constellis.ethicspoint.com) or through the following telephone numbers:

- Employees or third parties based in any country or in the **United States**: dial **1-844-637-6751**.
- Employees or third parties based in **Afghanistan or Iraq**: use an outside line to contact your local operator and request a reverse charge or collect call to be placed to the United States using the following numbers: **Afghanistan (5033526170)** or **Iraq (5033526174)**. All reverse charge or collect calls will be accepted by the contact center using an automated English message.

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- For employees or third parties in the **United Arab Emirates**, use an outside line and dial the direct access number as provided below for your location and then at the English prompt dial **844-637-6751**:
  - **UAE—8000-021**
  - **UAE (du)—8000-555-66**
  - **UAE (Military-USO and cellular)—8000-061**

The U.S. Government also requires that the Company provide its personnel with the hotline phone number of the Global Human Trafficking 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 that the Company’s obligations under governing federal regulations are met.

## **6.0 Recruitment and Wage Plan**

The Company’s recruitment process is primarily handled through the Global Staffing Department. If the Company uses a third party to source personnel they must comply with the local labor laws of the country in which the recruiting takes place and they must have trained employees that are familiar with the prohibited activities listed in section 3.0.

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 annually thereafter, the wages of Company employees will be compared to the country wage plan to ensure that each contract meets the requirements set forth in this section.

## **7.0 Housing Plan**

When the Company provides or arranges for employee housing then the Company will maintain a housing plan that will be based on contract and host country housing, safety, and legal requirements. If the housing is provided or arranged by the U.S. Government then a housing plan will not be provided.

## **8.0 Monitoring**

The CLO, or his or her designee, will engage in periodic monitoring activities to ensure that this Policy is being followed by all employees and third parties, to detect and prevent violations of this Policy, and to help ensure that 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.

### **8.1 Subcontractor Controls**

#### **8.1.1 Subcontractor Vetting**

If a Subcontractor will be retained to assist with the recruiting of personnel or will have employees working on their behalf, the Company requires that the subcontractor undergo a vetting process that includes an independent due diligence review through the Contracts and Legal Department. Additionally, all third parties recruiting companies must

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undergo a Level III due diligence review, or its equivalent, before a subcontract agreement can be established.

### **8.1.2 Certification and Subcontractor Compliance Plan**

All subcontractors with a contract valued over \$500,000, performing work outside of the U.S. will be required to agree to fully comply with FAR 52.222-50, *Combating Trafficking in Persons*, and this clause will be included in all contracts that are valued over \$500,000 and where the work will be performed outside of the U.S. 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 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. 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 subcontracts certification and compliance plan.

### **8.1.3 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 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 occurring based upon the location of the work, the size and complexity of the work being performed by, and the nature and scope of their activities.

## **9.0 Department of Defense Contracts**

For Department of Defense (“DoD”) contracts for a non-commercial item 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 an employee bill of rights in employee workspaces in English and any foreign languages spoken by a significant portion of the workforce. Specifically, the Company and third parties must ensure that their employees are aware of their rights to:
  - Hold their own identity or immigration documents, such as a passport or driver’s license;
  - Receive agreed upon wages on time;
  - Take lunch and work breaks;
  - Elect to terminate employment at any time;
  - Identify grievances without fear of reprisal;
  - Have a copy of their employment contract in a language they understand;
  - Receive wages that are not below the legal in-country minimum wage; and
  - Be notified of their rights, wages, and prohibited activity.

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## 10.0 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**

### 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