

## Human Trafficking Policy Statement

### Policy Statement

Ecolog has a zero-tolerance policy towards human trafficking in any form. Ecolog has targeted measures in place to prevent and combat trafficking in persons across its worldwide operations.

Ecolog acts in full compliance with the laws, regulations and policies of:

- U.S. Government, including, but not limited to, Federal Acquisition Regulation (FAR) – Subpart 22.17, 52.222-50, and 52.222-56, Defense Federal Acquisition Regulation Supplement (DFARS) – Subpart 222.17, and 252.222-7006(B);
- U.K. Government’s Modern Slavery Act;
- E.U. Anti-Trafficking Legislative Directive 2011/36/EU;
- United Nations’ Office of Drugs and Crime (UNODC);
- International Labor Organization (ILO); and
- all other applicable laws and regulations, as amended from time to time.

Ecolog’s Code of Business Ethics and Conduct (“**CBEC**”) strictly prohibits trafficking of persons and its related activities.

Ecolog directors, officers, employees, and other personnel adhere to the highest professional and ethical standards at all times, and are treated to the strictest degree of scrutiny in relation to prohibited conduct with swift disciplinary measures to follow, up to and including immediate termination, as appropriate.

### Scope of Policy

This Policy applies to:

- All direct employees, part-time or full-time, who are employed by or are in the process of being employed by Ecolog;
- All employees who work for Ecolog on a sub-contracted or consultancy basis and whose duties and responsibilities are directly defined and supervised by an Ecolog employee; and
- All Ecolog Subcontractors.

Additionally, we expect our clients, suppliers, and other third parties to uphold the same standards.

### Prohibitions

Ecolog prohibits any human trafficking-related activity to all parties to this Policy. This includes, but is not limited to, the following:

- Engage in forms of trafficking in persons;
- Procure commercial sex acts;
- Use of forced labor;
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's

identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;

- Use misleading or fraudulent practices during the recruitment or offering of employment;
- Use recruiters that do not comply with applicable labor laws and standards of the country in which the recruitment takes place;
- Charge recruitment fees from candidates or employees;
- Fail to provide return transportation to the home country or requiring payment for the cost of return transportation;
- Provide or arrange housing that fails to meet the host country housing and safety standards; and
- Fail to provide an employment contract, recruitment agreement, or other required work document in writing which shall be in a language the employee understands.

### **Training and Educational Programs**

Training and creating awareness are key elements to ensure the successful implementation of this Policy. Ecolog continuously conducts trainings related to human trafficking (to new and existing employees), through the following training programs:

- Pre-deployment training and induction training; and
- On-site field refresher training.

### **Incident Reporting**

If any of our employees becomes aware of a violation or a potential violation of this Policy, they are required to promptly report that violation to any of the Integrity Resources listed below:

- Employee's immediate manager;
- Local or Corporate Human Resources;
- Ecolog's Chief Compliance Officer; and
- Ecolog's Global Ethics Hotline by phone or web  
([secure.ethicspoint.eu/domain/media/en/gui/104564/index.html](https://secure.ethicspoint.eu/domain/media/en/gui/104564/index.html))

**No Retaliation.** Ecolog will not tolerate any retaliation against employees who report violations or suspected violations of this Policy in good faith. Reporting in "good faith" means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken. Anyone who retaliates against another employee for reporting misconduct will be subject to disciplinary action.

### **How Concerns are handled at Ecolog**

When Ecolog becomes aware of such concerns, we promptly and appropriately conduct an investigation in compliance with the applicable laws. Ecolog will take appropriate corrective or disciplinary action for violations of this Policy, our CBEC, as well as the applicable laws.