



Day & Zimmermann

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Policy: Human Rights and Against Trafficking in Persons

Policy No.: 1418

Responsible Officer: Senior VP, Human Resources

1.0 Policy Statement

The Company is committed to respecting, upholding and protecting human rights while working anywhere in the world. We are dedicated to manifesting good corporate citizenship through our commitment to respect human rights, including the prevention of human trafficking. This policy is consistent with and mirrors the United States Government's zero tolerance policy against trafficking in persons; it covers all employees and sets expectation levels at all business units performing work on behalf the Company anywhere in the world. It also sets forth the expectations for our suppliers, subcontractors, business partners, and agents.

2.0 Human Rights

Our Company is committed to conducting its business responsibly and ethically, while respecting international human rights principles in all of our operations. The Company's commitment is embodied in our Code of Ethics and Standards of Business Conduct as well as the policies and procedures that we require our employees, suppliers, and vendors to follow. The Company believes that we can play a constructive role in promoting respect for human rights through our own actions.

The Company's subsidiaries and divisions are signatories to various international codes of corporate behavior, including the *International Code of Conduct for Private Security Providers* under which it has agreed to abide by ICOC principles in its Private Security Operations outside of the United States in complex environments.

Our operations are driven by values of safety, integrity, and diversity. In our overseas operations, we are guided by the fundamental principles of human rights as set forth in the. United Nations Universal Declaration of Human Rights; the United Nations Guiding Principles on Business and Human Rights. We are also guided by and follow, as appropriate, other international principles, including the; Montreux Document on Pertinent International Legal Obligation and Good Practices for States Related to Operations of Private Military and Security Companies, which follows the "Respect, Protect, Remedy" framework; the Victims of Trafficking and Violence Protection Act of 2000; the Voluntary Principles on Security and Human Rights; and host country and local laws.

3.0 Prohibited Conduct

Employees and agents of the Company shall not during the period of performance of any covered contract:

- Engage in severe forms of trafficking in persons;
- Procure commercial sex acts;
- Used forced labor to perform any job duties

In addition, in the performance of overseas US federal contracts or subcontracts where FAR 52.222-50 applies, employees and agents of the Company applies shall not:

- 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 of employees or offering of employment, or use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charge employees recruitment fees;
- Fail to provide return transportation or pay for the cost of return transportation upon the end of employment;
- Provide or arrange housing that fails to meet the host country housing and safety standards; or
- If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing.

4.0 Definitions

Severe forms of trafficking in persons means:

- Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

Sex trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

Commercial sex act means any sex act on account of which anything of value is given to or received by any person.

Forced labor means knowingly providing or obtaining the labor or services of a person:

- By threats of serious harm to or physical restraining against that person or another person;
- By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
- By means of the abuse or threatened abuse of law or the legal process.

5.0 Measures to Comply with FAR 52.222-50

Whenever the Company or one of its Business Units is subject to the requirements of FAR 52.222-50, it shall comply with the following:

Awareness Program

The Company shall maintain and implement an Awareness Program to educate employees and subcontractors on this Policy Against Trafficking in Persons. The awareness program also teaches employees and subcontractors of their obligations under the Policy as well as the red flags associated with all forms of Human Trafficking, including the procurement of commercial sex acts and the use of forced labor. This Policy and select awareness materials shall be posted on the company or applicable business unit website.

Subcontractor Relations

The Company shall provide this Policy and related Awareness Program materials to subcontractors. It shall incorporate language into subcontract agreements to allow the Company to take remedial measures against subcontractors who engage in human trafficking up to and including termination for default. The Company shall regularly monitor subcontractor compliance with this policy.

Housing Plan

If the Company provides or arranges housing for personnel working OCONUS, the Company shall ensure that the housing meets the host country housing or safety standards or explains any variance.

Recruitment

The Company shall use due diligence in the hiring of recruitment companies to ensure they comply with and employ individuals familiar with U.S. Trafficking in Persons regulations.

The Company, its employees, subcontractors and agents must meet the following requirements in recruitment:

- No person shall use misleading or fraudulent practices in the recruitment of employees.
- There shall be no Charging of recruitment fees directly or indirectly to employees or recruits by the Company or its recruiting companies.
- Recruiters will comply with local labor laws in the country where the recruiting takes place.
- The Company will provide its employees with written employment agreements in a language that the employee understands
- The Company and its subcontractors will pay the return transportation costs at the end of employment for employees who were brought to the country for the purpose of working on a U.S. Government contract or subcontract unless not required to do so under applicable law.

In recruitment, the Company, its recruiters and agents will disclose to potential employees basic information about the employment including key terms and conditions of employment, wages and benefits, location of the work, living conditions, housing, associated costs, significant costs to be borne by the employee, and the hazardous nature of the work. The information should be provided in a format and language accessible to the worker.

Wages and Other Requirements

The Company shall comply with applicable wage requirements for employees, as required by their host country.

It is against company policy and applicable regulations for any person to destroy, conceal, confiscate or otherwise deny an employee access to his or her identity or immigration documents.

Compliance Plan

The Company will maintain a Compliance Plan for all contracts to be performed outside of the United States that will, at the least, include the following aspects:

- An awareness program
- A process for reporting activity that might be in violation of the Anti-Trafficking Policy without fear of reprisal or retaliation, including a means to make available to all employees the hotline phone number for the Global Human Trafficking Hotline at 1-844-888-FREE and help@befree.org.
- A plan for recruitment that only permits use of recruitment companies with trained employees, prohibition on recruitment fees, and that wages meet host country requirements.
- A housing plan
- Procedures to prevent agents and subcontractors from engaging in trafficking in persons and to monitor, detect, and terminate persons or companies that have engaged in the activities.

As required by contract, the Compliance Plan shall be posted at each workplace and on the Company web site.

6.0 Reporting Requirements

Employees are encouraged to report to their supervisor or manager any information that they receive, from any source, which alleges that another employee, subcontractor, or agent has engaged in conduct that violates this policy. In addition, the Company maintains an Ethics Help Line that is available for employees or third parties to ask questions, register concerns, or report violations of our Human Rights Policies or the Company's Code of Conduct. Inquiries or complaints are documented, reviewed by the Company's Ethics and Compliance Department, and dealt with as circumstances warrant. The Ethics Help Line contact information is available to the public on the Company's website. All reports will be investigated promptly and the matter will be kept as confidential as possible.

Employees may also report, without fear of retaliation, activity inconsistent with this policy to the Global Human Trafficking Hotline at 1-844-888-FREE or its email address at help@befree.org.

If the Company determines that there is credible evidence of a violation of the policy under a federal contract or subcontract, the Company shall report to the Contracting Officer and the agency Inspector General of the allegations, the results of the investigation, and any actions taken against the employee, subcontractor, or agent.

The Company, its subcontractors and agents will protect those employees that are suspected of being victims of trafficking prior to return to their Home of Record and will not prevent the employee from cooperating fully with government authorities.

7.0 Compliance with this Policy

Our support for these principles is reflected throughout our policies and in our interactions with employees, suppliers, clients and the host countries where we do business. The Company expects employees and suppliers to act in a responsible manner consistent with the commitments set forth in this policy. The Company requires employees to comply with applicable laws and regulations and holds them accountable for complying with such policies. Similar expectations exist for clients and suppliers. Failure to follow Company policies in this regard could result in disciplinary action, termination of employment or agreements, and potential personal legal liability.

8.0 No Retaliation

There shall be no retaliation of any kind against any employee who report information that alleges in good faith a violation of this policy, or any employee who assists or participates in any manner in an investigation of such allegations.