



COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING

Policy Number: 135:3
Effective Date: October 2015
Revision Date: June 2024
Applies to: All TTI Locations

Created By: Human Resources
Approved By: Senior Staff
Reviewed Date: June 2024

SCOPE

At TTI we are committed to conducting business with integrity, honesty and fairness. This Combating Modern Slavery and Human Trafficking Policy (“Policy”) applies to TTI, Inc. and TTI’s subsidiaries referred to as the Family of Specialists (“FOS”) (collectively “Company”).

PURPOSE

The U.S. Government has a zero-tolerance policy regarding any government employee, contractor personnel and their agents engaging in any form of trafficking in persons. Any employee of the Company, subcontractors and their employees, and our agents are required to comply with all applicable modern slavery laws and combating trafficking in persons requirements contained in U.S. Federal Acquisition Regulation (FAR): 52.222-50, the U.S. Defense FAR Supplement (DFARS): 252.203-7004, the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 Cth. Therefore, the Company has developed this Policy to comply with these requirements, and to emphasize our commitment to mitigating the risk of modern slavery, human trafficking, child labor and forced labor in any aspect of our business. *It is important to note that even though this policy addresses specific U.S. Government requirements and Modern Slavery Acts, it applies to all Companies and locations.*

DEFINED TERMS

“Agent” means any individual, including a director, officer, employee, or an independent contractor, authorized to act on behalf of the Company.

“Child Labor” refers to the exploitation of children through any form of work that deprives them of their childhood, interferes with their ability to attend regular school, and is mentally, physically, socially and morally harmful.

“Coercion” means (1) Threats of serious harm to or physical restraint against any person; (2) Any scheme, plan or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or (3) The abuse or threatened abuse of the legal process.

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

“Debt bondage” means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited or defined.

“Employee” means an employee of the Company directly engaged in the performance of work under a government contract who has other than minimal impact or involvement in contract performance.

“Forced labor” means knowingly providing or obtaining the labor or services of a person (1) By threats of serious harm to, or physical restraint against, that person or another person; (2) By means of any scheme, plan or pattern intended to cause that 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 (3) By means of the abuse of threatened abuse of law or the legal process.

“Involuntary servitude” includes a condition of servitude induced by means of (1) Any scheme, plan or pattern intended to cause a person to believe that, if the person did not enter into or continue in such condition, that person or another person would suffer serious harm or physical restraint; or (2) the abuse or threatened abuse of the legal process.

“Modern Slavery” is defined as the recruitment, movement, harboring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. This also includes holding a person in a position of slavery, servitude forced or compulsory labor, or facilitating their travel with the intention of exploiting them soon after.

“Severe forms of trafficking in persons” means (1) sex trafficking in which a commercial sex act is induced by force, fraud or coercion or in which a person induced to perform such act has not attained 18 years of age; or (2) 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.

“Subcontractor” means (1) an entity hired to perform specialized work (2) a workforce service provider/agency hired to supply workers for specific tasks or services within an operation.

POLICY

The Company has adopted a zero-tolerance policy regarding modern slavery and trafficking in persons. Company employees, subcontractors, employees of subcontractors, and their agents shall not:

- A. Engage in forms of trafficking in persons;
- B. Procure commercial sex acts;
- C. Use forced labor;
- D. Use child labor;
- E. 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;
- F. Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and a language accessible to the worker, 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 cost to be charged to the employee, and if applicable, the hazardous nature of the work;
- G. Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- H. Charge employee recruitment fees or charge any money by any middlemen in lieu of the promise for employment or under any pretext (if such an incident is discovered, the Company will reimburse the money to the affected worker and charge it to the subcontractor and deduct the same from the professional fees owed to the relevant agency);
- I. Deduct wages as a disciplinary measure.
- J. Fail to provide return transportation or pay for the cost of return transportation upon the end of employment;
- K. Provide or arrange housing that fails to meet the host country housing and safety standards; or
- L. If required by law or contract, fail 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 and in compliance with applicable laws, including but not limited to labor and immigration laws. 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.

COMPLIANCE

Employees are responsible for reading, understanding, and complying with this Policy, and employees are responsible for reporting any violations of this Policy.

Employees may report, without fear of retaliation, activity inconsistent with this Policy on combating modern slavery and human trafficking to their supervisor or manager. Also, employees may report their concerns directly to someone in a higher level of management

than their manager or Human Resources. In addition, anonymous reports can be made via the Berkshire Hathaway Ethics Hotline via a toll-free hotline or by submitting a report on-line. In addition, the U.S. Government has a Global Human Trafficking Hotline that can be reached by phone at 1-888-373-7888, by texting HELP to 233733 (BEFREE) and by e-mail at help@humantraffickinghotline.org. For reporting modern slavery violations in Australia, please utilize the Anti-Slavery Australia Hotline at (02) 9514 8115. For reporting modern slavery violations in the UK, please utilize the Modern Slavery Helpline at 08000 121 700. Employees are provided protection from retaliation for whistleblowing on alleged slavery and human trafficking violations.

Any violation of this Policy could result in disciplinary action which may include but is not limited to, an employee's removal from the contract, reduction in benefits or termination of employment.

The Company will take appropriate action, up to and including termination, against agents or subcontractors who violate applicable modern slavery and human trafficking U.S. FARs and DFARSs and Modern Slavery Act requirements in their performance of contracts with the Company.

The Company shall flow down applicable U.S. FARs, DFARSs and Modern Slavery Act requirements regarding combating modern slavery and human trafficking to all subcontractors.