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| POLICY TITLE* : COMBATting HUMAN TRAFFICKING | POLICY ID* : CORP.COMPL.002 |
| POLICY EFFECTIVE DATE* : 03/01/2022 | POLICY VERSION* : 001 |
| <input checked="" type="checkbox"/> REVIEWED/REVISED OR <input type="checkbox"/> RETIRED DATE* : 11/03/2023 | DEPARTMENT* : COMPLIANCE |
| APPROVAL DATE* : | PAGE : 1 of 7 |

COMBATting HUMAN TRAFFICKING POLICY

Purpose*

PRIDE Industries (“PRIDE”) does not tolerate forced or involuntary labor in any form. Further, as a supplier of goods and services to the US government, PRIDE has developed and maintains this compliance policy and plan for combating trafficking in persons in accordance with US Federal Acquisition Regulation 52.222-50 (“FAR 52.222-50”). Together with PRIDE’s Standards of Conduct and Business Ethics Policies, this plan is intended to address PRIDE’s obligations in contracts and subcontracts for the supply of goods and/or services to the US government that incorporate FAR 52.222-50 and require a compliance plan (“Contracts”).

Scope*

This policy applies to all PRIDE Industries employees, directors, officers, independent contractors and other individuals performing services on PRIDE’s behalf (for ease of reference throughout this Plan referred to as “personnel”).

Policy Description*

The US government has adopted a policy, documented in FAR 52.222-50, prohibiting trafficking in persons including trafficking-related activities set forth below (“Policy”). PRIDE is committed to a work environment that is free from human trafficking and slavery, which for purposes of this

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| APPROVAL DATE* : | PAGE : 2 of 7 |

policy includes forced labor and unlawful child labor. PRIDE complies, and requires all personnel to comply, with the Policy.

Prohibited Conduct

Specifically, personnel shall not:

- (1) Engage in severe forms of trafficking in persons during the period of performance of any Contract;
- (2) Procure commercial sex acts during the period of performance of any Contract;
- (3) Use forced labor in the performance of any Contract;
- (4) Destroy, conceal, confiscate, or otherwise deny access by an employee who is directly engaged in the performance of work under a Contract and who has other than a minimal impact or involvement in the performance of a Contract (“Employee”) to the Employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
- (5) (i) Use misleading or fraudulent practices during the recruitment of or offering of employment to Employees, such as failing to disclose basic information, in a format and language understood by the Employee or potential Employee, 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 provided or arranged by PRIDE or its personnel), any significant costs to

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| APPROVAL DATE* : | PAGE : 3 of 7 |

be charged to the Employee or potential Employee, and, if applicable, the hazardous nature of the work;

(ii) Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;

(6) Charge Employees or potential Employees recruitment fees;

(7) Fail to provide return transportation or pay for the cost of return transportation upon the end of employment (A) for an Employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a Contract (for portions of Contracts performed outside the United States); or (B) for an Employee who is not a United States national and who was brought into the United States for the purpose of working on a Contract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the Employee (for portions of Contracts performed inside the United States); except that

- i. The requirements of this paragraph (7) shall not apply to an Employee who is: (A) legally permitted to remain in the country of employment and chooses to do so, or (B) exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation.
- ii. The requirements of this paragraph (7) are modified for a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons, PRIDE shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. For

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| APPROVAL DATE* : | PAGE : 4 of 7 |

example, PRIDE shall not only offer return transportation to a witness at a time when the witness is still needed to testify. This paragraph does not apply when the exemptions in paragraph (7) apply.

(8) Provide or arrange housing that fails to meet the host country housing and safety standards; or

(9) 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. 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. The Employee’s work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

Underage Labor Prevention

PRIDE shall only employ workers who meet the following age criteria:

- Workers must be at least 15 years of age, which is the applicable minimum legal age for employment.
- Alternatively, workers must have reached the applicable age for completion of compulsory education, whichever is highest.

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| APPROVAL DATE* : | PAGE : 5 of 7 |

Legitimate Workplace Apprenticeship Programs

PRIDE may provide workplace apprenticeship programs that offer educational benefits to eligible workers. These programs must adhere to the principles outlined in Article 6 of the International Labor Organization (ILO) Minimum Age Convention No. 138. The key guidelines for legitimate workplace apprenticeship programs include:

- Ensuring the program provides suitable education and training opportunities that contribute to the worker's personal development and future employability.
- Offering appropriate working hours and conditions that prioritize the worker's well-being, safety, and health.
- Ensuring that participation in the apprenticeship program does not interfere with the worker's access to compulsory education.

Light Work Opportunities

PRIDE may provide light work opportunities for eligible workers in compliance with Article 7 of the ILO Minimum Age Convention No. 138. Light work refers to tasks that are not likely to harm the worker's health, safety, or development. The guidelines for offering light work opportunities include:

- Identifying and assigning light work tasks that are appropriate for the worker's age, physical and mental capabilities, and stage of development.

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| APPROVAL DATE* : | PAGE : 6 of 7 |

- Ensuring that the duration and intensity of light work tasks do not impede the worker's access to education or jeopardize their overall well-being.
- Providing suitable supervision and guidance to ensure the worker's safety and welfare during light work assignments.

Violations

PRIDE will take appropriate action, up to and including termination, against personnel that violate the Policy.

Reporting

All Employees are required to report any activity inconsistent with this Policy, with the assurance that there will be no retaliation or other negative consequences for persons acting in good faith. Any credible information received from any source that any PRIDE personnel has violated FAR 52.222-50 must be reported immediately to Corporate Compliance at: compliance@PRIDEIndustries.com.

Alternatively, Employees may also report a violation as set forth in the Standard of Conduct Code or by contacting one of the following hotlines:

- The hotline phone number of the Global Human Trafficking Hotline at 1-844-888FREE and its email address at help@befree.org.
- The US National Human Trafficking Hotline at 1-888-373-7888 or text 233733.

Definitions:

Not applicable

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| APPROVAL DATE* : | PAGE : 7 of 7 |

Related Policies:

Standards of Conduct and Discipline Business Ethics

References/Citations:

[FAR 52.222-50 Combatting Trafficking in Persons](#)

Attachments:

Not applicable

Revision Log:

| REVISION* | DATE* |
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| <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVIEWED <input type="checkbox"/> REVISED <input type="checkbox"/> RETIRED (SELECT ONE) REVISION SUMMARY: New policy | 11/03/2023 |

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