



TEKSYNAP ANTI-HUMAN TRAFFICKING POLICY

TekSynap is fully committed to ethical business practices in delivery of value to our customers. TekSynap is also committed to ensuring its workplaces are free from human trafficking and slavery. As a contractor performing prime contracts with the U.S. Government, TekSynap’s policy complies with the requirements of FAR clause 52.222-50 and applies to any contract for (i) supplies (other than COTS items) acquired outside the United States, or (ii) services to be performed outside the United States (whether as a prime or through the use of independent contractors or subcontractors), and has an estimated value that exceeds \$500,000.

TekSynap and its employees, officers, temporary and contingent employees (collectively “employees”), independent contractors, suppliers and subcontractors shall not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation. Further, employees, independent contractors, suppliers, subcontractors shall not:

- 1) Engage in any form 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 to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
- 5) Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language understood by the employee or potential employee, 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 costs to be charged to the employee or potential employee, and, if applicable, the hazardous nature of the work;
- 6) Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- 7) Charge employees, applicants or candidates for employment recruitment fees;
- 8) If required by law or contract, fail to provide return transportation or pay for the cost of return transportation upon the end of employment;
- 9) If required by law or contract, fail to provide or arrange housing that fails to meet the host country housing and safety standards; or
- 10) 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.



Any information regarding a potential violation of this policy must be immediately reported to TekSynap's Human Resources Department or Contracts Department, or directly to TekSynap's President or CEO. Employees may also report potential human trafficking violations to the Global Human Trafficking Hotline at (US) 1-844-888-FREE or its email address at help@humantraffickinghotline.org.

All TekSynap employees agree to follow all federal, state and local laws and identified business practices in TekSynap's Employee Handbook as they relate to ethical behavior. Violations of this policy may result in disciplinary action, up to and including termination of employment.

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