

## **POLICY AGAINST HUMAN TRAFFICKING AND FORCED LABOR**

Astronautics Corporation of America is opposed to human trafficking and forced labor in any form. We are committed to working to mitigate the risk of human trafficking and forced labor in all aspects of our business. This document describes the program requirements and processes established and implemented by Astronautics to comply with Federal Acquisition Regulation (“FAR”) 52.222-50, Combating Trafficking in Persons.

### **POLICY**

U.S. government contractors and their employees and agents directly engaged in the performance of work on a government contract who have “other than a minimal impact or involvement in contract performance” are prohibited from trafficking in persons, including the trafficking-related activities set forth in this policy. In keeping with the prohibitions set forth in FAR 52.222-50, Astronautics and its employees and agents shall not -

1. Use forced labor, which means knowingly providing or obtaining the labor or services of a person:
  - 1.1 By threats of serious harm to, or physical restraint against, that person or another person;
  - 1.2 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
  - 1.3 By means of the abuse or threatened abuse of law or the legal process;
2. Engage in severe forms of trafficking in persons, defined as:
  - 2.1 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
  - 2.2 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 subsection to involuntary servitude, peonage, debt bondage, or slavery;
3. Procure commercial sex acts, defined as any sex act on account of which anything of value is given to or received by any person;
4. Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents;
5. Use misleading or fraudulent practices during the recruitment of employees or offering of employment;
6. Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
7. Charge employees or potential employees recruitment fees;
8. Fail to provide return transportation or pay for the cost of return transportation costs for certain employees who have finished employment outside that employee’s nation of residence;
9. Provide or arrange housing that fails to meet the host country housing and safety standards;

10. If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing in a language the employee understands, with required details about the work and, 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.

### **AWARENESS PROGRAM**

Astronautics has developed and implemented an awareness program to inform its employees about the U.S. government and Astronautics' policy prohibiting the trafficking-related activities described above, the actions that will be taken by Astronautics against an employee for a violation of the policy, and a process for employees to report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons. Under the awareness program, employees will be informed about the above at the time of their hire and then through regular company communications.

### **REPORTING PROCESS**

Employees should consult with the Astronautics Human Resources Department if they are uncertain whether a specific action would be in violation of the FAR or this policy.

Employees may report, without fear of retaliation or reprisal and subject to protection under 10 U.S.C. 2409 as implemented in DFARS subpart 203.9, any activity that violates the FAR or this policy to any one or more of the following:

- (a) An Astronautics Human Resources professional or an Astronautics director or vice president or the Astronautics president or chief executive officer; or
- (b) Our Ethics Hotline at 1-844-499-0414 or <https://astronautics.ethicspoint.com> operated by Navex; or
- (c) The Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

### **NOTIFICATION**

Astronautics shall inform the applicable Contracting Officer and the agency Inspector General immediately upon receipt of credible information it receives from any source that alleges a violation of FAR 52.222-50 and of any action taken against an Astronautics employee, subcontractor, subcontractor employee, or their agent pursuant to FAR 52.222-50.

### **POSTING**

Astronautics will post its compliance program at the workplace and on its website.

### **SUBCONTRACTORS**

Astronautics includes FAR 52.222-50, Combating Trafficking in Persons, as applicable, in the terms and conditions that it flows down to its subcontractors under U.S. government contracts.

## **CERTIFICATIONS**

If any portion of a U.S. government contract is for supplies, other than commercially available off-the-shelf items, acquired outside of the United States, or services to be performed outside of the United States and has an estimated value that exceeds \$550,000, Astronautics will provide certifications to the applicable Contracting Officer and to any applicable prime contractor as required by the FAR. Prior to the award of a covered subcontract, and annually during performance of the subcontract, Astronautics shall obtain from each subcontractor with subcontracts for supplies, other than commercially available off-the-shelf items, acquired outside of the United States or services to be performed outside of the United States and has an estimated value that exceeds \$550,000, appropriate certifications as required by the FAR.