

## **Anti-Human-Trafficking Policy**

### **Purpose**

Germanow Simon and the United States Government prohibit trafficking in persons. The U.S. Government's policy prohibiting trafficking in persons is available at 48 CFR § 52.222-50 and is summarized below under the heading: "Summary of U.S. Government Policy of Prohibiting Trafficking in Persons."

Germanow Simon is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. Germanow Simon will not tolerate or condone human trafficking or slavery in any part of our global organization.

Germanow Simon employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom Germanow Simon conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

### **Scope**

This policy applies to all personnel employed by or engaged to provide services to Germanow Simon, including, but not limited to, employees, officers, and temporary employees of Germanow Simon and Germanow Simon's U.S. and international subsidiaries, and independent contractors (for ease of reference throughout this policy, "employees").

Every employee is responsible for reading, understanding and complying with this policy. Germanow Simon managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them. If you have any questions or concerns relating to this policy, consult the Germanow Simon human resources department.

### **Procedures**

Report any conduct that you believe to be a violation of this policy to Germanow Simon's human resources department. Reports may also be made by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org), which allows anonymous reporting as permitted by applicable law.

Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy.

### **Disciplinary Actions**

Germanow Simon will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this policy may be grounds for disciplinary action, up to and including termination. Germanow Simon and its subsidiaries have the exclusive right to interpret this policy regarding their respective employees.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

### **Summary of U.S. Government Policy of Prohibiting Trafficking in Persons**

U.S. Government policy prohibits trafficking in persons and slavery. Government contractors and their employees, subcontractors, subcontractor employees, and agents must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, 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 provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants recruitment fees.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.