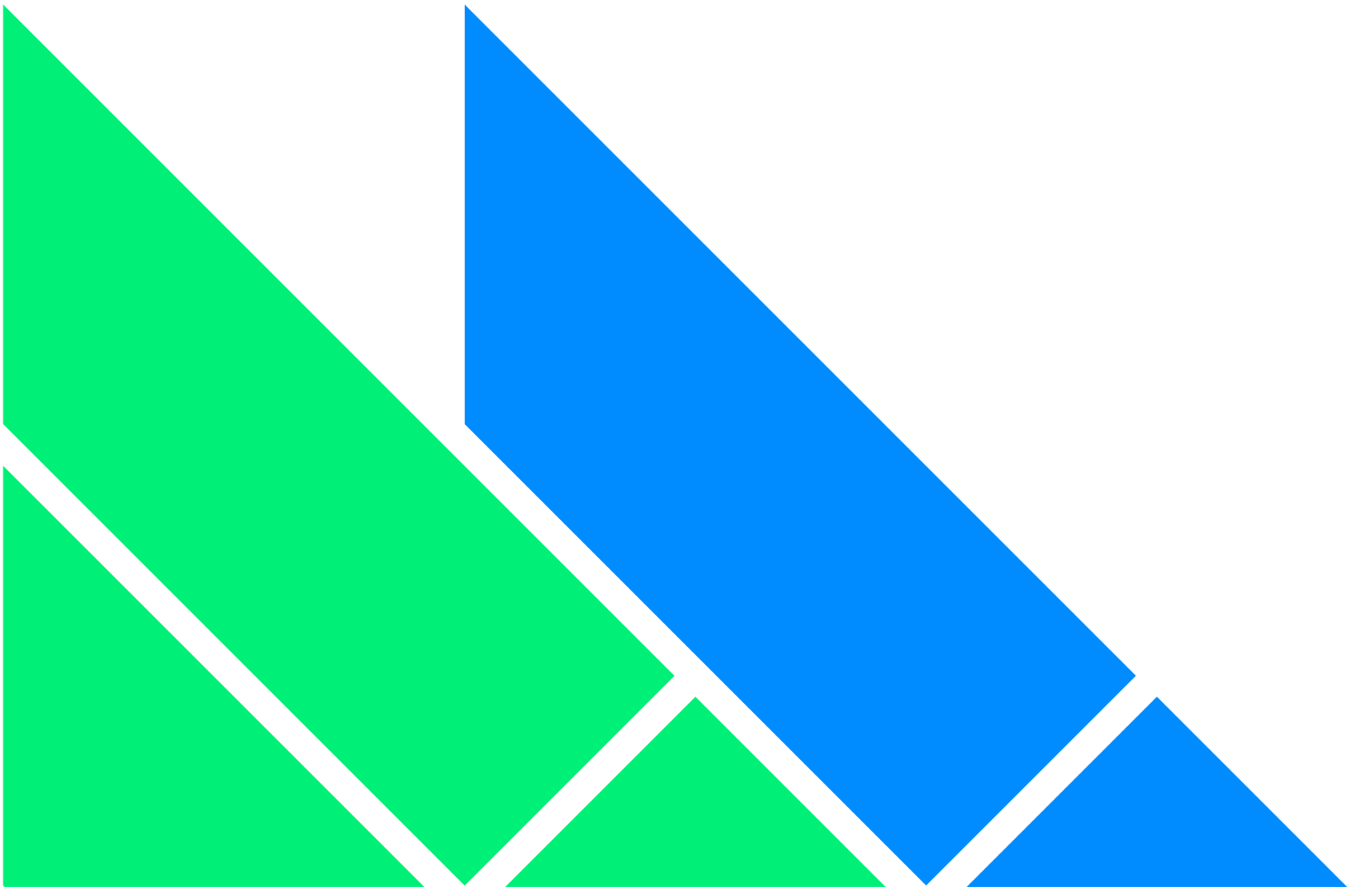
336 South Service Road
Melville, NY 11747
P: 516-336-6720
hauglandgroup.us

HUMAN TRAFFICKING COMPLIANCE PLAN

Revised August 1, 2023



HUMAN TRAFFICKING COMPLIANCE PLAN

Haugland Group LLC and it's affiliates (herein referred to as the "Company), opposes any form of human trafficking, including slavery, sex trafficking, involuntary servitude, forced or compulsory labor, child labor, and any related activities. We find these activities inherently harmful and dehumanizing. No employee nor any company agent, subcontractor, vendor, or supplier shall solicit, obtain, or be involved in such activities. If any employee, agent, or subcontractor is found to have engaged in such behavior, the company will take appropriate action, up to and including termination of employment, or termination of the subcontract.

In accordance with Federal Acquisition Regulation (FAR) 52.222-50, the Company has developed this Combating Trafficking in Persons – Policy and Compliance Plan (the "Plan") to be implemented on United States Government contracts or subcontracts for supplies, other than commercially available off-the-shelf ("COTS") items, acquired outside the U.S. or services to be performed outside the U.S. and has an estimated value that exceeds $550,000. The purpose of this Plan is to ensure employees, agents, and subcontractors are aware of prohibited conduct under Combating Trafficking in Persons regulations and laws, as well as actions that may result from violations.

1. PROHIBITED ACTIVIES

The Company fully supports the U.S. Government's policy prohibiting trafficking in persons, and strictly prohibits employees, agents, and subcontractors from:

A. Engaging in any form of trafficking in persons during the period of performance of the contract;
B. Procuring commercial sex acts during the period of performance of the contract;
C. Using forced labor in the performance of the contract;
D. 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;
E. Using 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;
F. Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
G. Charging employees and potential employees' recruitment fees;
H. (i) Failing to provide return transportation or pay for the cost of return transportation upon the end of employment in the following instances:

(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 to work on a U.S.

Government contract or subcontract (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 to work on a U.S. Government contract or subcontract, 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

(ii) The requirements of paragraphs 1.H.a of this clause shall not apply to an employee who is:

(a) Legally permitted to remain in the country of employment and who 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;

(iii) The requirements of paragraph 1.H.a 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. The Company 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 example, the Company 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 at paragraph 1.H.a apply.

I. Providing or arrange housing that fails to meet the host country housing and safety standards; or
J. If required by law or contract, failing 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.

2. DISCIPLINARY ACTIONS

If any employee, agent, subcontractor, vendor, or supplier is found to have engaged in prohibited activities, the Company will promptly take action, including but not limited to the following, as applicable:

- Termination of employment, or removal of employee from the contract;
- Require the subcontractor to remove subcontractor employee(s) from the contract;
- Termination of the subcontract for default or cause, in accordance with the termination clause of the subcontract, or require the subcontractor to terminate a lower-tier subcontract; or
- Termination of the business relationship with the subcontractor.

Furthermore, the Company will report prohibited activities and any actions taken against an employee, agent, or subcontractor to the Contracting Officer and the agency Inspector General, as required by FAR 52.222-50.

3. COMPLIANCE PLAN

The Company has established this Plan to comply with FAR 52.222.50(h). The Plan is available via the Company's website https://hauglandgroup.us/ and the Company's Intranet for active employees, to inform all employees and new hires about prohibitions against trafficking-related activities described in FAR 52.222-50(b), the activities prohibited, consequences for violating company policy and reporting methods. Additional information about Trafficking in Persons can be found at the web site for the Department of State's Office to Monitor and Combat Trafficking in Persons: www.state.gov/j/tip.

A. Reporting Method

Any Company employee, agent, or subcontractor doing work on behalf of the company is required to report activity inconsistent with the policy prohibiting trafficking in persons set forth in FAR 52.222-50, including information or knowledge of actual or potential human trafficking violations, without fear of retaliation, to the employee's Manager and to Human Resources. Reports may be filed online through the below website, by calling the below toll-free telephone number, by email at the below email address, or by fax at the below fax number. Reports may be made confidentially if the individual so chooses.

- Website: https://www.lighthouse-services.com/hauglandllc
- Toll-Free Telephone:
  - English speaking USA and Canada: 833-210-3957
  - Spanish speaking USA and Canada: 800-216-1288
  - Spanish speaking Mexico: 01-800-681-5340
  - French speaking Canada: 855-725-0002
- E-mail: reports@lighthouse-services.com (must include company name with report)
- Fax: 215-689-3885 (must include company name with report)

Any company employee, agent, or subcontractor doing work on behalf of the company may also report violations by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org. Retaliation against an individual who reports a violation is strictly prohibited.

B. Recruitment and Wage Plan

The Company permits only the use of recruitment and staffing companies that , ensure compliance with local labor laws, and ensures wages meet applicable host country legal requirements or explains any variance. The Company prohibits using misleading or fraudulent practices to recruit employees, such as failing to use language that is understandable to workers or failing to disclose basic information regarding the key terms and conditions of employment and, if applicable, potentially hazardous work conditions.

C. Monitoring Procedures for Agents and Subcontractors

For U.S. government contracts specified under FAR 52.222-50, the Company requires agents and subcontractors at any tier and at any dollar value to comply with all applicable laws and regulations to combat trafficking in persons.

D. Posting

The Company shall post this plan on its Intranet and the Company website.