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## POLICY: ANTI-HUMAN TRAFFICKING

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### A. Policy Statement

Management Technology Consulting, LLC and its affiliates (hereinafter, collectively, "MTC" or "Company") are committed to maintaining safe, productive working conditions for its employees.

The Company strictly prohibits, and will not tolerate, trafficking in persons and any other form of slavery, including but not limited to, sex trafficking and/or labor trafficking.

Trafficking is the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes of a commercial sex act and/or labor or services using force, fraud, or coercion for the purposes of subjection to involuntary servitude, debt, or slavery.

MTC employees, contractors, subcontractors, suppliers, vendors, and others through whom MTC conducts business 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.
- Viewing explicit material using company funds or resources or viewing explicit material involving trafficked persons.
- Procuring commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or driver's licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and benefits, the location of work, the living conditions, housing and associated costs (if employer or agent-provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work.
- Charging applicants/candidates 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.

Contractors, subcontractors, suppliers, and vendors will be advised as to the policy's application to them as set forth in communications of Service Agreement and in a Supplier Code of Conduct.

MTC officers and managers are responsible for implementing and enforcing this Policy in accordance with the provisions set forth within. MTC will provide appropriate training to supervisors for implementing the Company policy and procedures.

This policy is effective immediately and supersedes all previous policies.

## **B. Mandatory Reporting Requirements**

Employees who become aware of potential violations of the Human Trafficking Policy or any related laws or regulations have an immediate obligation to report these concerns to their supervisor or company officer so any and all issues may be reviewed and addressed in an ethical and responsible manner and further reported, if necessary.

Timeliness of reporting any suspected violation is critical as most respective Government in areas of MTC's global business have imposed reporting obligation when there is credible information of violations.

Employees may confidentially report possible violations to the Company's third-party Compliance and Reporting Hotline at 1-844-886-2116. The Company will not take any adverse action against employees for making an honest report of suspected human trafficking-related activities.

## **C. Violations of this Policy**

If the Company suspects that an employee, contractor, subcontractor, supplier, vendor, or any other agent of the Company has violated this policy, the Company will immediately investigate and, at its sole discretion, take appropriate actions against those who violate this policy. Such actions include, but are not limited to, termination of the agreement or contract, removal from the contract, reduction in benefits, and disciplinary action up to and including termination of employment.

The Company may also refer the matter to law enforcement. Finally, any job applicants who violate this policy will not be hired to work at the Company.

Failure to report actual or potential illegal behavior or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment.

The Company requires employees who perform work under a United States Government contract to confirm that they are aware of and understand each of the above items prior to the commencement of their assignment under the contract.

## **D. Counseling and Rehabilitation Programs**

For those affected by human trafficking, MTC offers eligible employees the opportunity for Employee Assistance, a benefit program that aids employees who suffer from personal or emotional problems.

Employees who have questions about the services offered by the should contact the President Rakesh Agarwal or CEO Darryl Henderson as listed in the company's online email and Teams directories.

All information an employee provides to MTC regarding his or her desire to seek treatment will be kept confidential and handled in accordance with applicable law. The Company will reasonably accommodate employees who are seeking treatment in accordance with applicable law.

*Should any information in this policy conflict with any federal or state law, the applicable agreement or provision of law will take precedence.*

*For more information about your responsibilities under this Policy, please contact our CEO in MTC's Los Angeles HQ at +1 323-851-5008.*