

----- **HUMAN TRAFFICKING POLICY** -----

Human Trafficking Policy

Integrity Consulting prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

Integrity Consulting also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including:

- Destroying or otherwise denying access to an employee's identity or immigration documents;
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment;
- Using recruiters that do not comply with local labor laws;
- Charging employees recruitment fees;
- Failing to provide return transportation to certain employees who are brought to a country for the purpose of working on a U.S. Government contract;
- Providing housing that fails to meet host country standards; and
- Failing to provide an employment contract or work document where required by law.

Integrity Consulting will take appropriate disciplinary action for violations of these rules, up to and including discharge of employees, subcontractors, and agents.

Integrity Consulting must cooperate fully with the U.S. Government or other appropriate governmental authorities in audits or investigations relating to such violations. Employees of Integrity Consulting operating companies are required to cooperate in any internal or external investigation of suspected wrongdoing under this policy.

Mandatory Reporting Requirements

Employees having knowledge of credible information concerning actual or potential violations of this policy must report them immediately to Integrity management. 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.

Integrity Consulting companies do not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, which could include termination of employment.