

Combating Trafficking in Persons (“CTIP”)
ZERO TOLERANCE FOR VIOLATIONS

The United States Government has adopted a policy prohibiting trafficking in persons including the trafficking-related activities. Cantu Services, Inc. has the same policy.

Severe forms of trafficking in persons are strictly prohibited and include but are not limited to (1) where 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; and (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 subjection to involuntary servitude, peonage, debt bondage, or slavery. Trafficking-related activities which are prohibited include but are not limited to:

- A. Denying access (i.e. through destruction, concealment, confiscation, or otherwise) by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
- B. Utilizing misleading or fraudulent recruitment practices or offering of employment, such as failing to disclose, in a format and language accessible to the worker, 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 cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- C. Using recruiters that do not comply with local labor laws;
- D. Charging employees recruitment fees;
- E. If specific circumstances apply and no exception applies, failing to provide return transportation or pay for the cost of return transportation upon the end of employment for an employee who is not a United States national and who was brought into the United States for the purpose of working 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 (only the Company’s President/Compliance Officer has authority to decide if persons in such circumstances will be employed in the first place and whether there is an applicable exception);
- F. Providing or arranging for housing that fails to meet host country housing and safety standards (the host country can be the United States); and
- G. 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.

Definitions of terms and phrases to increase awareness and understanding include but are

not limited to:

1. *Coercion* means, (a) Threats of serious harm to or physical restraint against any person; (b) Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or (c) The abuse or threatened abuse of the legal process.
2. *Commercial sex act* means any sex act on account of which anything of value is given to or received by any person.
3. *Debt bondage* means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.
4. *Forced Labor* means knowingly providing or obtaining the labor or services of a person- (a) By threats of serious harm to, or physical restraint against, that person or another person; (b) 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 (c) By means of the abuse or threatened abuse of law or the legal process.
5. *Involuntary servitude* includes a condition of servitude induced by means of- (a) Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or (b) The abuse or threatened abuse of the legal process.
6. *Sex trafficking* means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

Cantu Services, Inc. requires employees, agents and subcontractors (all personnel) to report activity by any person (i.e. subcontractor employees at any tier, Cantu employees etc.) inconsistent with the policy prohibiting trafficking in persons. There is employee protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, from reprisal for whistleblowing on trafficking in persons violations. Reports will be made without fear of retaliation. Actions that will be taken against employees or agents for violations of this policy are reflected in Cantu Services, Inc.'s of the *Code of Business Ethics and Conduct* which describes disciplinary actions for violations of the *Code*. These disciplinary actions also include, but are not limited to, removal from the contract, reduction in benefits, or termination of employment.