

Document Name: Trafficking in Persons Policy	Revision Number: 01	Revision Date: 01/13/2022	Origination Date: 11/02/2018
Policy Number SC-01-52	Prepared By: MAB	Approved By: DC	Page: 1 of 2

1. Purpose

SubCom, LLC is committed to conducting business in accordance with our core values and the highest standards of ethics and integrity. In doing business around the world, no person associated with SubCom, LLC shall engage in human trafficking. In support of this commitment, this Policy has been adopted to insure a proper understanding of trafficking-related activities and expected behaviors of all personnel regarding mandatory compliance with laws regarding trafficking in persons.

2. Scope

This policy applies worldwide to all personnel of SubCom, LLC, its affiliates and subsidiaries (collectively, the “Company” or “SubCom”), as well as any other individual or entity acting for or on behalf of the Company. Nothing herein shall be construed as an agreement to indemnify or assume the liabilities of External Third Parties.

3. References

- SubCom “Guide to Ethical Conduct”
- SMS Doc # SMS 08 Resources and Personnel
- SMS Doc # SMS 09 On Board Complaint Procedure

4. Policy

A. Trafficking in Persons

U.S. Government regulations and SubCom policy prohibit employees, union employees, subcontractors, subcontractor employees, and agents from engaging in trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in their jurisdiction), 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. In addition, these regulations prohibit certain employment 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.

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The U.S. Government imposes severe penalties for violations of these rules, which could result in discharge of employees, union employees, subcontractors, subcontractor employees, or agents and limit or prohibit SubCom from pursuing certain opportunities.

Employees having knowledge of such violations must report them immediately in accordance with SubCom “Guide to Ethical Conduct” (and in the case of ship board personnel the On-Board Complaint Procedure (SMS#09)). SubCom must cooperate fully with the U.S. Government in audits or investigations relating to such violations. Further, SubCom employees, union employees, subcontractors, subcontractor employees and agents must cooperate fully with any audit or investigation relating to such violations.

B. Mandatory Reporting Requirements

As a SubCom employee, union employee, subcontractor, subcontractor employee, or agent you **must** report any actual or suspected illegal or unethical behavior to SubCom’s Human Resources or Law Departments (and in the case of ship board personnel the Designated Person (DP)). Failure to report actual or suspected illegal or unethical behavior is as serious an offense as committing such acts. Reports may be made to the Designated Person (DP), SubCom’s Director of Human Resources, General Counsel or the ConcernLine/ConcernNet. In making a report, you are encouraged to share as much information as possible so that SubCom can take appropriate action. SubCom’s employees are also required to cooperate in any internal or external investigation of suspected wrongdoing. Reprisal, threats, retribution or retaliation against any person who has reported suspected wrongdoing or against any person who is assisting in any investigation or process with respect to such a violation, is strictly prohibited.

REVISION #	REVISION DATE	REVISION DETAILS
01	01/13/2022	Update of personnel titles in Section 4B, added ConcernNet and removed Ombudsman