

Human Trafficking and/or Modern Slavery Policy

Luttrell Staffing Group and its subsidiaries and affiliates (“the Company”) have a zero-tolerance policy for human trafficking and/or modern slavery. The Company strictly prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include, but are not limited to, engaging in any form of human trafficking, exploitation, or sex trafficking, procuring commercial sex acts in the performance of any work, 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.

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

- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents;
- Using misleading or fraudulent practices to recruit candidates and/or employees, such as failing to disclose key terms and conditions of employment;
- Using recruiters that do not comply with local labor laws;
- Charging applicants and/or 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 or arranging housing that fails to meet host country housing and safety standards; and
- Where required by law, failing to provide an employment contract or work document in a language the employee understands.

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

The Company must cooperate fully with the U.S. Government or other appropriate governmental authorities in audits or investigations relating to such violations. Company employees 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 in accordance with Company policy. Employees are

encouraged to report suspected violations or incidents immediately after their occurrence to one of the following:

- Their immediate Manager;
- The Human Resources Director;
- any of the Owners of Luttrell Staffing Group

Timeliness of reporting any suspected violation is critical as the U.S. Government has imposed an especially stringent reporting obligation when there is credible information of violations. 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.

When making a report, employees are encouraged to share as much information as possible so that appropriate action can be taken, and to do so in writing.

Non-Retaliation Policy

The Company does not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or governmental audit or investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, which could include termination of employment.