

# ANTI-HUMAN TRAFFICKING POLICY

## I. OVERVIEW

Hansen Engineering Co. (“HEC”) is firmly committed to the eradication of forced and involuntary labor in all its forms. As a proud supplier to the U.S. government, we have established and uphold a rigorous compliance policy to combat human trafficking, in line with U.S. Federal Acquisition Regulation 52.222-50 (“FAR 52.222-50”).

This policy is specifically designed to fulfill our contractual obligations when providing goods and/or services to the U.S. government under contracts or subcontracts that incorporate FAR 52.222-50 and necessitate a compliance plan.

## II. PURPOSE

HEC is steadfast in its commitment to fostering a work environment that is unequivocally free from human trafficking and slavery, encompassing forced labor and unlawful child labor. We will not tolerate or condone any form of human trafficking or slavery within any facet of our organization.

All individuals and entities associated with HEC, including employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and other business conduits, are expected to actively avoid involvement in any activity that could be construed as trafficking in persons or slavery.

## III. SCOPE

HEC is committed to upholding the U.S. government’s policy, as outlined in FAR 52.222-50, which strictly prohibits human trafficking and related activities. This policy applies to all individuals associated with HEC, including but not limited to employees, officers, temporary staff of Hansen and Hansen’s U.S. and international subsidiaries, and independent contractors (collectively referred to as ‘employees’ in this policy).

Every employee is expected to familiarize themselves with, understand, and adhere to this policy. Supervisors at HEC bear the responsibility of ensuring that their direct and indirect reports comply with this policy and complete any necessary certification or training. For any questions or concerns regarding this policy, employees are encouraged to reach out to HEC’s legal or HR departments.

## IV. POLICY

In alignment with the U.S. Government’s stringent policy against human trafficking and slavery, HEC, along with its employees, subcontractors, their personnel, and representatives, are strictly prohibited from participating in any activity that could be characterized as human trafficking or slavery. This encompasses a wide range of activities, including but not limited to:

- Engaging in actions such as recruitment, sheltering, transportation, provision, or acquisition of individuals through force, deception, or manipulation with the intent to impose conditions of involuntary servitude, forced labor, debt bondage, or enslavement on them.

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- Initiating or participating in a commercial sexual act that is compelled by force, deception, or manipulation, or where the individual coerced into such an act is under the age of eighteen.
- Any act of destroying, hiding, seizing, or in any way preventing an employee from accessing their personal identification or immigration documents, such as passports or driver's licenses, irrespective of the issuing body, is prohibited.
- Engaging in deceptive or fraudulent methods during employee recruitment, or neglecting to provide, in a language the worker understands, essential information about employment terms, living conditions, accommodation, and the potential risks associated with the work is not acceptable.
- Utilizing recruiters who fail to adhere to the local labor laws of the country where the recruitment takes place is not permissible.
- Imposing recruitment fees on employees is not allowed.
- Not providing or covering the cost of return transportation for an employee at the end of their employment term is unacceptable. This applies especially to employees who are not citizens of the country where they work, or those who are non-US nationals brought to the United States specifically to work on a US Government contract or subcontract.
- It is unacceptable to provide or organize accommodation that does not comply with the housing and safety standards of the host country.
- It is unacceptable not to provide an employment contract, recruitment agreement, or any other necessary work document in written form when it is mandated by law or contract.

## V. ENFORCEMENT

Any breach or non-compliance with this policy could lead to disciplinary measures, potentially culminating in termination.

HEC maintains a strict non-retaliation stance towards employees who, in good faith, report concerns or cooperate with compliance investigations, even in instances where no evidence is found to support the report.

Individuals are encouraged to report any behavior they perceive as a violation of this policy to their immediate supervisor or HEC's Human Resources department.

## VI. DISTRIBUTION

It is anticipated that all individuals associated with HEC, including employees, subcontractors, their personnel, and representatives, will be well-versed with this policy and the activities it identifies as constituting human trafficking.

### Policy History

Version	Reviewed Date	Effective Date	Description
1.0	7/12/2021	7/12/2021	Initial policy release