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WessDel Combating Trafficking in Persons Compliance Policy

WessDel is committed to complying with the U.S. Federal Acquisition Regulation (FAR) 52.222-50, Combating Trafficking in Persons, which prohibits trafficking in persons and related activities. This compliance policy is designed to ensure that WessDel, its employees, and subcontractors adhere to the regulations and maintain a high standard of ethical conduct.

Purpose

WessDel is opposed to human trafficking in all forms and is supportive of the U.S. Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons ("FAR 52.222-50") to combat human trafficking, and will ensure the risk of such practices is mitigated within the business. FAR 52.222-50 prohibits U.S. Government contractors and their agents from engaging in any form of trafficking in persons, defined to mean 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, debt bondage or slavery and sex trafficking. To comply with FAR 52.222-50 all applicable businesses engaged in contract with the U.S. Government must develop a Compliance Plan to ensure such mitigation of risks.

Prohibited Conduct

WessDel employees and subcontractors are prohibited from engaging in the following activities:

1. Engaging in any form of trafficking in persons, including 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.
2. Procuring commercial sex acts during the performance of the contract.
3. Using forced labor in the performance of the contract.
4. Destroying, concealing, confiscating, or otherwise denying access to an employee's identity or immigration documents.
5. Using misleading or fraudulent recruitment practices, such as failing to disclose basic information about the terms and conditions of employment.
6. Charging employees recruitment fees.
7. Failing to provide or pay for return transportation costs for employees brought to a country for the purpose of working on a U.S. government contract or subcontract.
8. Providing or arranging housing that fails to meet the host country's housing and safety standards.

Applicability

WessDel's Human Trafficking Compliance Plan applies to all acquisition activities in support of WessDel contracts or subcontracts with the U.S. Government for supplies or services with no exceptions. The plan is to be adhered to by employees, suppliers, contractors, subcontractors, subcontractor employees

and agents of WessDel, including subsidiaries and joint ventures controlled by WessDel, performing work under a U.S. federal government contract.

Appropriateness

A Compliance Plan must be appropriately tailored to the size and complexity of the U.S. Government contract, and to the nature and scope of the activities to be performed. WessDel reserves the right to review and revise its Human Trafficking Compliance Plan should the nature and complexity of its contracts with the U.S. Government change.

Compliance Plan

WessDel has developed and maintained a compliance plan to prevent prohibited trafficking-related activities and to monitor, detect, and terminate any contractors, subcontractors, or agents engaging in such activities. The compliance plan will include the following elements:

1. **Employee Awareness and Training:** WessDel will provide a mandatory 25-minute training course titled "Human Trafficking Awareness for Employees of Federal Contractors" to all employees. This course, developed with subject matter support from The Potomac Law Group, PLLC, covers the company's Combating Trafficking in Persons policy, prohibited conduct, and reporting procedures. It also teaches employees how to recognize indicators of trafficking in persons and what to do if they suspect prohibited activities are occurring in the conduct of any work the company is doing for the US government. The course is available through Insuperity and provides certificates upon completion.
2. **Supplier Code of Conduct:** WessDel maintains a Supplier Code of Conduct which is published on WessDel's public website. This Supplier Code of Conduct expresses the expectations we hold for Suppliers, including adherence to regulations prohibiting human trafficking and compliance with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and appropriately address any adverse human rights impacts of their operations.
3. **Reporting Procedures:** Employees and subcontractors are required to report any knowledge or suspicion of trafficking-related activities or any other unethical behavior to WessDel management or the contracting officer. Additionally, employees can report trafficking-related activities or any other unethical behavior through our anonymous whistleblowing channel at <https://www.faceup.com/c/wessdel> or our phone number 1-201-493-5757. Reports submitted through this channel are completely secure and anonymous. Employees can also report trafficking-related activities through the Global Human Trafficking Hotline at 1-844-888-FREE or by sending an email to help@befree.org.



4. **Recruitment, Housing, and Wage Plan:** WessDel prohibits misleading or fraudulent recruiting practices during all recruitment activities. WessDel will only use recruitment companies who do not

charge recruitment fees to the employee and will review upon engagement recruitment companies' terms of business to ensure compliance. Wessdel will take measures to ensure employee wages meet applicable country legal requirements or will explain any variance. In the event that WessDel or its contractors, suppliers and agents intend to provide or arrange housing in connection with performing work under a contract that meets the requirements, housing will meet host country housing and safety standards

5. **Subcontractor Compliance:** The requirement to adhere to FAR 52.222-50 is mandatory for all contractors, suppliers and agents WessDel engages with. This requirement is to be flowed down to all sub-tier contractors, suppliers and agents who engage in business indirectly with WessDel. The substance of FAR 52.222-50 will be included in subcontracts and in contracts with agents. However, requirements for a Compliance Plan apply only to any portion of the subcontract that meets the same prime contractor thresholds.

Violations and Remedies

WessDel will take appropriate action against employees, subcontractors, or agents who violate the Combating Trafficking in Persons policy. Actions may include disciplinary measures, termination of employment or contracts, or referral to law enforcement authorities. WessDel will cooperate with any investigations related to trafficking in persons and will provide access to relevant documentation upon request by the contracting officer or other authorized officials.

Posting and Certification

WessDel displays FAR 52.222-50 Combating Trafficking in Persons posters including making available the phone number of the Global Human Trafficking Hotline (U.S.) 1-844-888-FREE and email address of help@humantraffickinghotline.org. A copy of this plan will be placed on WessDel's external website and may be provided to contractors, suppliers and agents upon request.

Annually after receiving an award, WessDel will certify that; 1) it has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities and, 2) After having conducted due diligence, to the best of WessDel's knowledge and belief, neither it nor any of its agents, subcontractors or their agents are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, WessDel or its subcontractor has taken the appropriate remedial and referral actions.