

## *Anti-Human Trafficking Policy*

### **1.0 Scope/Objective**

This policy defines Litron's activities to comply with Federal Acquisition Regulations 22.1700 and 52.222-50, Combating Trafficking in Persons.

#### **LITRON ANTI-HUMAN TRAFFICKING POLICY**

Litron, Inc. has adopted the United States Government's zero tolerance policy regarding trafficking in persons. In support of the commitment, Litron has developed a program that includes an employee awareness program, a reporting process, and procedures to prevent agents and subcontractors from engaging in trafficking. This program is defined here and disseminated to all customers and suppliers of Litron, Inc. through our website.

### **2.0 Definitions**

#### **2.1 Coercion** means –

2.1.1 Threats of serious harm to or physical restraint against any person;

2.1.2 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

2.1.3 The abuse or threatened abuse of the legal process.

**2.2 Debt Bondage** means the status or condition of a debtor arising from a pledge by the debtor of his/her personal services or those of a person under his/her control as 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.

**2.3 Employee** means an employee of the Contractor directly engaged in the performance of work under the contract who has other than a minimal impact or involvement in the contract performance.

**2.4 Human Trafficking** is the use of force, fraud, or coercion for the purpose of obtaining labor.

**2.5 Involuntary Servitude** includes a condition of servitude induced by means of:

2.5.1 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

2.5.2 The abuse or threatened abuse of the legal process.

**2.6 Severe forms of trafficking in persons** means:

2.6.1 Sex trafficking in which a commercial sex act is induced by force, fraud, coercion, or in which the person induced to perform such act has not attained 18 years of age; or

2.6.2 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.

**2.7 Sex Trafficking** means the recruitment, harboring, transportation, provision, or obtaining for a person for the purpose of a commercial sex act.

### **3.0 Responsibility**

**3.1** Quality Assurance is responsible for the definition of this policy in accordance with federal regulations. Quality Assurance is also responsible for the training of all employees on this policy and ensuring that due diligence activities are performed.

- 3.2 Purchasing is responsible for ensuring that dFARs requirements are flowed down as required to relevant suppliers.
- 3.3 Top Management is responsible for providing resources and leadership support for this policy.

#### **4.0 Awareness Program**

- 4.1 Employees are trained upon new hire via the LTE-010 Anti-Human Trafficking presentation. The presentation includes:
  - 4.1.1 Viewing the Human Trafficking Awareness Training published by U.S. Homeland Security.
  - 4.1.2 Training to the content of this policy, including the reporting procedure.

#### **5.0 Reporting Procedure**

- 5.1 Employees may report any suspected occurrence of human trafficking in the workplace to the following management members. All reporting to government officials is handled by management officials if the employee desires anonymity.
  - 5.1.1 Michael Ashe, Controller (Top Management for Human Resources)
  - 5.1.2 Sue Moller, Office Manager
  - 5.1.3 Tara Douglas, Quality Assurance Manager & Management Representative
- 5.2 All Employees are provided contact information for Homeland Security Investigations (HSI) and ICE for the purposes of reporting suspected occurrences of human trafficking both in the workplace and outside of the workplace.
  - 5.2.1 Initial hire training includes details on the Blue Campaign and the contact information for HSI and ICE.
  - 5.2.2 The Blue Campaign Human Trafficking 101 posting is provided at both Litron buildings for all employees.

#### **6.0 Supply Chain Management and Due Diligence**

- 6.1 Litron, Inc. Quality Clause Q11 covers agent and sub-contractor requirements for zero tolerance policies in human trafficking. This requirement is flowed down through the purchase orders. All agents and sub-contractors are required to have policies in place to:
  - 6.1.1 Prevent the use of forced labor in their own operations
  - 6.1.2 Prevent the placement of forced labor in Litron facilities for the purposes of sub-contracted temporary labor
  - 6.1.3 Maintain awareness programs and reporting procedures as required by US dFARs codes 22.1700 and 52.222-50.



**Mark Plasse**  
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