

Sallyport Global Holdings
Notice on Combating Trafficking in Persons Policies

Background. The United States Government (“USG”) has policies prohibiting trafficking in persons. Sallyport Global Holdings (SGH”) supports these policies and has adopted its own corporate compliance program to prevent and detect trafficking in persons (“TIPS Policy”) (SGH-ECO-005). The following activities are examples of prohibited human trafficking:

1. Sex trafficking or procuring commercial sex acts
2. Forced labor
3. Destroying, confiscating, or otherwise denying access to an employee's identity or immigration documents, such as passports or drivers' licenses
4. Using misleading or fraudulent practices during the recruitment of employees
5. Failing to provide return transportation at the end of employment
6. Providing or arranging for employee housing that fails to meet the host country’s housing and safety standards
7. When required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing in a language understood by the employee

Violations. SGH employees and agents who violate the TIPS Policy are subject to disciplinary action, including removal from performing USG Government contracts and subcontracts, reduction in benefits, or termination of employment and agent agreements. SGH will also refer TIPS violations to law enforcement where violations of law are implicated.

Reporting. All SGH employees and agents are obligated to report any suspected instances of human trafficking to Sallyport, using the EthicsPoint hotline tools, or by reporting to Human Resources or the Corporate Ethics and Compliance Officer. Reports may be made anonymously.

ETHICSPPOINT HOTLINE

U.S. Hotline - 1.844.240.0621

Iraq Toll Free/Collect Hotline - 1.971.371.7846

Afghanistan Toll Free/Collect Hotline - 1.971.371.7841

Web Intake Site - www.sallyportglobal.ethicspoint.com.

The following Government reporting mechanisms are also available for reporting purposes:

Global Human Trafficking Hotline at 1-844-888-FREE and help@befree.org.