

## **Aero Simulation Inc. Combating Trafficking in Persons Policy and Compliance Plan**

### **Purpose**

Aero Simulation Inc. (ASI) is opposed to human trafficking in all forms and is supportive of the US Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons (hereafter referred to as FAR 52.222-50) to combat human trafficking and will ensure the risk of such practices is mitigated from occurring in any aspect of our business and our supply chain 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 minimize the risk of human trafficking and to comply with FAR 52.222-50 regarding human trafficking and related activities, ASI employs a multifaceted approach to address the risk of human trafficking and related activities as outlined below.

### **Scope and Applicability**

This policy applies to all personnel employed by or engaged to provide services to ASI, including, but not limited to, ASI employees, contractors, subcontractors, vendors, suppliers, partners and others through whom ASI conducts business (for ease of reference throughout this policy, “employees”) of ASI.

The requirement to adhere to FAR 52.222-50 is mandatory to all contractors, suppliers, and agents ASI engages with. This requirement is to be flowed down to all sub-tier contractors, suppliers, and agents who engage in business indirectly with ASI. The substance of FAR 52.222-50 will be included in subcontracts and in contracts with agents.

The Compliance Plan applies within the business to contracts or subcontracts with the US Government for supplies (other than commercially available off-the-shelf items) or services, acquired or performed outside of the US with an estimated value that exceeds \$550,000.

### **Summary 52.222-50 Combating Trafficking in Persons**

US Government policy prohibits trafficking in persons and slavery. Government contractors and their employees, subcontractors, subcontractor employees, and agents must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Using forced labor in the performance of any work.

- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, basic information; or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing, and associated costs (if provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants recruitment fees.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.

## **Employee Awareness Program**

### *Display of Information*

Information regarding the ASI Combating Trafficking of Persons Policy and Compliance Plan are posted as follows:

- The ASI Combating Trafficking of Persons Policy and Compliance Plan is published on ASI's Wiki.
- The ASI Combating Trafficking of Persons Policy and Compliance Plan is placed on ASI's external website <https://www.aerosimulation.com> and made available to our contractors, suppliers, and agents through our standard terms.
- FAR 52.222-50 Combating Trafficking in Persons posters prominently displayed making available the phone number of the Global Human Trafficking Hotline (US) 1-844-888-FREE and email address of [help@humantraffickinghotline.org](mailto:help@humantraffickinghotline.org) should any violations need to be reported.

### *Training*

ASI has adopted Human Trafficking training available through our Human Resource Information System (HRIS). This training will be completed during onboarding by new employees and contractors and will be completed annually in the month of January (National Human Trafficking Month).

## **Risk Assessment**

An overall risk assessment is conducted as part of the ASI Annual Risk Review process to assess the risk to the business in relation to FAR 52.222-50. If it is identified that a supplier falls within the requirements, a risk assessment on the supplier may be conducted.

## **Recruitment and Wages**

ASI does not knowingly support or participate in any of the following activities:

- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging employees recruitment fees. In addition, ASI only permits the use of recruitment companies that provide proper training to employees, do not charge recruitment fees to employees, and that have established procedures to ensure that wages meet applicable host country legal requirements.

## **Housing**

If ASI or its contractors, suppliers, and agents intend to provide or arrange housing (including temporary housing such as hotels) in connection with performing work under a federal contract subject to 52.222-50, they are required to establish a housing plan for such work that ensures that the housing meets that meets host country housing and safety standards.

## **Requirements for Contractors, Suppliers, and Agents**

ASI requires contractors, suppliers, and agents to comply with all applicable local, state, and national government laws and regulations of the local region they are conducting operations in. Upon request, information will be made available to all contractors, suppliers, and agents on combating human trafficking including copies of this plan and internal training materials. If in the vicinity, ASI employees have the right to observe contractor premises for any violations of FAR 52.222-50.

ASI reserves the right to take appropriate action and remedies/ referrals if a problem arises, and to terminate any contract should a report of violation be substantiated.

## **Reporting Procedures**

ASI personnel, subcontractors, subcontractor employees and agents are required to report any violations of or activity inconsistent with the US Government's policy prohibiting trafficking in persons set forth in FAR 52.222-50(b), and may do so without fear of retaliation and are subject to employee protection, if applicable, under U.S.C. 2409 as implemented in the DFARS subpart 203.9, by contacting their supervisor/manager, Human Resources representative, or any member of the management team or contact [s\\_mathews@aerosimulation.com](mailto:s_mathews@aerosimulation.com) and may also contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email at [help@befree.org](mailto:help@befree.org).

Should employees or contractors, suppliers, and agents be unsure as to whether a specific action would be a violation of FAR 52.222-50, they should consult any member of ASI's Leadership Team.

## **Disciplinary Actions**

ASI will take appropriate action against violators of this Policy and/or the Human Trafficking Compliance Plan. Disciplinary action(s) may include, but are not limited to:

- Removal of employees from the contract or requiring the subcontractor to remove a subcontractor employee or employees from the contract.
- Termination of employment.
- Declining to exercise available options under the contract.
- Termination of the contract for default or cause, in accordance with the termination clause of the contract, or requiring the subcontractor to terminate a contract.
- Termination of the business relationship with the subcontractor, including suspension or placement of subcontractor on ASI's debarment list.
- Violation of the US Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

Note: ASI will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

## **Certification**

If applicable, after receiving an award and annually thereafter, Per FAR 52.222-50(h), ASI will certify that it has a Compliance Plan in place, has conducted due diligence, and has acted on any violations found. Certification for contractors, suppliers, and agents that meet the threshold will also be requested at this time.

## **Further Information**

All employees and contractors are encouraged to come forward to discuss the topic of human trafficking, or a perceived or actual violation, at any time. For further information

not covered in this plan, please contact a member of ASI's Leadership Team. Additionally, ASI will continue to review, reassess, and further develop its anti-trafficking plans. ASI will review and consider any best practices that we can adopt to enhance our own policies and procedures.