



Anti-slavery and anti-trafficking policy

Utilli, LLC.

ISO 27001 VERSION 1.0

APPROVED BY: RAJA VEMURI

VERSION: 1.0

CLASSIFICATION: INTERNAL

Table of contents

- ANTI-SLAVERY AND ANTI-TRAFFICKING POLICY 1
- 1. PURPOSE 4
- 2. SCOPE..... 4
- 3. PROCEDURES..... 4
- 4. DISCIPLINARY ACTIONS..... 5
- 5. SUMMARY OF U.S. GOVERNMENT POLICY OF PROHIBITING TRAFFICKING IN PERSONS 5
- 6. COMPLIANCE..... 6
- 7. POLICY REVIEW AND UPDATE 6
- 8. POLICY ENFORCEMENT 6

Record of Changes

Type of Information	Document Data
Document Title:	Anti-slavery and trafficking policy
Document Owner:	Raja Vemuri- Uilli Technology Lead
Approved by:	Ali Saberi - CTO
Issued:	Dec 28, 2019
Reviewed & Revised:	March 24, 2021

Revision Control

Version Number	Nature of Change	Date Approved
1.0	Initial version	Dec 28, 2019
1.1	Review and update – Raja S	March 24, 2021

Document Distribution and Review

The document owner will distribute this document to all approvers when it is first created and as changes or updates are made. This document will be reviewed and updated annually or upon written request by an approver or stakeholder. Questions or feedback about this document can be directed to the owner or a listed approver

1. Purpose

Utilli and the United States Government prohibit trafficking in persons. The U.S. Government's policy prohibiting trafficking in persons is available at 48 CFR § 52.222-50 and is summarized below under the heading: "Summary of U.S. Government Policy of Prohibiting Trafficking in Persons."

Utilli is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. Utilli will not tolerate or condone human trafficking or slavery in any part of our global organization.

Utilli employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others through whom Utilli conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

2. Scope

This policy applies to all personnel employed by or engaged to provide services to Utilli, including, but not limited to, employees, officers, and temporary employees of Utilli and Utilli's U.S. international suppliers, partners, and independent contractors (for ease of reference throughout this policy, "employees").

Every employee is responsible for reading, understanding, and complying with this policy. Utilli managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them. If you have any questions or concerns relating to this policy, consult the Utilli legal department or human resources department.

3. Procedures

Report any conduct that you believe to be a violation of this policy to Utilli's legal or human resources department. Reports may also be made through the Utilli Ethic Hotline at +1 3017607760 or via email at ethics@utilli.com;, which allows anonymous reporting as permitted by applicable law.

Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy.

4. Disciplinary Actions

Uitilli 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.

Any violation of this policy may be grounds for disciplinary action, up to and including termination. Uitilli and its subsidiaries have the exclusive right to interpret this policy regarding their respective employees.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

5. Summary of U.S. Government Policy of Prohibiting Trafficking in Persons

U.S. 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.

6. Compliance

Violations of this policy will be reported to the Utili senior management and may result in disciplinary action.

7. Policy Review and Update

This policy and its supporting procedures will be reviewed at least annually and updated as required.

8. Policy Enforcement

Failure to comply with this policy will result in disciplinary action up to and including termination of employment.