

STRATEGIC SOLUTIONS UNLIMITED INC. COMBATING TRAFFICKING IN PERSONS POLICY

HUMAN RESOURCES POLICY

It is the mission of Strategic Solution Unlimited Inc. (SSU) Human Resources department to provide effective HR management by developing and implementing policies, programs and services that contribute to the attainment of corporate and employee goals. In addition, it aims to demonstrate, both internally and externally, that it meets requirements for diversity, ethics and training as well as its commitments in relation to regulation and corporate governance of its employees. The establishment of an HR Policy which sets out obligations, standards of behavior and document disciplinary procedures, is now the standard approach to meeting these obligations.

COMBATING TRAFFICKING IN PERSONS POLICY AND COMPLIANCE PLAN

Objective

SSU has established the following plan in compliance with FAR 52.222-50. The purpose of this Plan is to set out SSU's policies and procedures for: (1) making SSU employees aware of the conduct prohibited under SSU policy and the Anti-Trafficking Provisions and the actions that may be taken against employees for violations; (2) employing fair recruitment, wage and housing practices; and (3) preventing prohibited trafficking activity by suppliers, subcontractors and sub-recipients, and monitoring, detecting and terminating those who engage in such activities. SSU is committed to a work environment that is free from human trafficking-related activities, which for purposes of this policy, includes forced labor and unlawful child labor. SSU strictly prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking or slavery. This policy is consistent with SSU's Code of Business Ethics and Conduct.

Scope

This Plan identifies SSU's baseline standards for anti-trafficking compliance and applies presumptively to all U.S. Government contracts, subcontracts, cooperative agreements, awards and sub awards. This policy applies to all personnel employed by or engaged to provide services to SSU Inc., including, but not limited to, employees of SSU temporary employees, contingent workers, independent contractors, subcontractors, subcontractor employees, and agents. SSU posts this CTIP Policy on its employee portal/website, where it can be accessed by all SSU personnel at any time online.

Policy

SSU prohibits all forms of human trafficking, slavery, servitude, forced or compulsory labor and all other trafficking-related activities. We are committed to fully complying with all applicable labor and employment laws, rules and regulations and working to mitigate the risk of human trafficking in our industry. SSU has adopted a policy on Combating Trafficking in Persons that reflects the Anti-Trafficking Provisions' that prohibit trafficking-related activities and describe the actions SSU may take against employees and agents who violate the Policy, and sets out the procedure for reporting and investigating Policy violations. SSU has a zero-tolerance policy for trafficking in-persons activity.

Employees, subcontractors, subcontractor employees, vendors, suppliers, partners, and others whom SSU conducts business must not engage in any practice that constitutes trafficking in persons. 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 individual to the individual'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
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place
- Charging employees 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 or work document in writing

Disciplinary Action

SSU will take appropriate action against employees, subcontractors, subcontractor employees and agents that violate this Policy and Plan. This action may include, but is not limited to, the following as applicable:

- Removal of employees from the contract, or requiring the subcontractor to remove a subcontractor employee or employees from the contract
- Reduction in employee benefits
- 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

Recruitment and Wage Plan

SSU prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment. SSU must fully and accurately disclose, in a format and language accessible to the employee, all key terms and conditions of employment, including wages and benefits, work location, living conditions, housing and associated costs (where provided or arranged by SSU), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

SSU provides to every employee an employment contract, recruitment agreement or other required work document, written in a language the employee understands, containing all required information about the terms of conditions of employment, which may include, by way of example,

the work description, wages, work location, living accommodations and associated costs, time off, transportation arrangements, grievance process, the content of applicable laws and regulations prohibiting trafficking in persons.

Housing

In the event SSU or a subcontractor intends to provide or arrange housing in connection with performing work under a federal contract subject to FAR 52.222-50, SSU, and if applicable, the subcontractor shall establish a housing plan for such work that ensures that the housing meets host-country housing and safety standards.

Awareness

All SSU employees receive the latest company CTIP awareness policy as part of initial and annual training and as a part of the corporate Code of Ethics training program. SSU has developed and implemented an awareness program to inform all employees about the prohibitions against human trafficking, activities prohibited, and the actions that will be taken against employees, subcontractors, subcontractor employees, and agents for violating this Policy. Acknowledgements confirming completion of training and adherence to the policies are required by all SSU employees. Acknowledgements are tracked by the Human Resources Department in the Human Resources Information System.

Investigations and Audits

All employees and third parties through which SSU conducts business are required to fully and promptly cooperate with internal and external audits and investigations to include Federal agencies conducting any audit or investigation, and must respond fully and truthfully with their questions, requests for information, and documents. Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting email or other documents, may be grounds for disciplinary action, up to and including removal from the contract or termination against employees, agents or subcontractors.

Reporting and Policy Compliance

All SSU personnel, Suppliers and Supplier Personnel are required to report any suspected trafficking-related activity or violation of this policy to SSU. Reports may be made via SSU Human Resources Department (910)222-8138. Employees having knowledge of credible information concerning actual or potential violations of this Policy must report them immediately in accordance with SSU policy to the Human Resources Department or a member of the Management Team. Employees aware of potential human trafficking violations may, in addition, contact the DoD Hotline at (800) 424-9098 or at <http://www.dodig.mil/hotline/>. SSU strictly prohibits retaliation against any employee who reports prohibited trafficking-related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. SSU personnel who engage in any form of retaliation against those who report prohibited trafficking-related activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment.



Periodic Reassessment of the Plan

SSU will periodically review and assess the internal controls assuring compliance with this Plan. Modification of controls and measures will be implemented as required.