



# SAALEX CORPORATION

## Human Trafficking Compliance Plan

---

### I. Statement of Policy

Saalex Corporation and its wholly owned subsidiaries, hereafter collectively referred to as "Saalex Corp," oppose human trafficking in all forms. Saalex Corp is committed to supporting U.S. Federal Acquisition Regulation 52.222-50, Combating Trafficking in Persons (hereafter referred to as FAR 52.222-50), to combat human Trafficking and mitigate the risk of such practices within the business. FAR 52.222-50 prohibits U.S. Government contractors and their agents from engaging in any form of human trafficking including recruiting, harboring, transporting, or obtaining a person for labor or services through force, fraud, or coercion for involuntary servitude, debt bondage, slavery, or sex trafficking. To comply with FAR 52.222-50, Saalex Corp has developed this Compliance Plan to ensure risks associated with human Trafficking are mitigated effectively.

### II. Applicability

The Saalex Corp Human Trafficking Compliance Plan applies to all acquisition activities supporting Saalex Corp contracts or subcontracts with the U.S. Government for supplies or services without exception. This plan is to be adhered to by all employees, suppliers, contractors, subcontractors, subcontractor employees, and agents of Saalex Corp, including subsidiaries and joint ventures controlled by Saalex Corp, performing work under a U.S. federal government contract.

### III. Appropriateness

The Compliance Plan must be appropriately tailored to the size and complexity of the U.S. Government contract and to the nature and scope of activities to be performed. Saalex Corp reserves the right to review and revise this Human Trafficking Compliance Plan should the nature and complexity of its contracts with the U.S. Government change.

SLX00-00178

JULY, 2025

**This document is uncontrolled when in hard copy format or stored in any electronic format other than an approved Saalex Governance System.**

This is an official Saalex Policy, approved by Jaime Bartkowski, Saalex Chief Compliance Officer.

#### **IV. Compliance Plan**

##### **A. Training and Awareness**

Human Trafficking Awareness Training is conducted annually for all employees and as needed to reinforce Saalex Corp's and the U.S. Government's zero-tolerance policy. Training materials are available to contractors and third parties upon request.

##### **B. Supplier Code of Conduct**

Saalex Corp maintains a Supplier Code of Conduct, available on the public website. This Code outlines expectations for Suppliers, including adherence to regulations prohibiting human Trafficking and compliance with all local laws in the countries where they operate.

Suppliers must refrain from violating others' rights and appropriately address any adverse human rights impact of their operations.

##### **C. Recruitment and Wages**

Saalex Corp prohibit misleading or fraudulent recruiting practices. Saalex Corp only engages recruitment companies that do not charge recruitment fees to employees and reviews recruitment terms to ensure compliance. Saalex Corp ensures employee wages meet applicable country legal requirements or provides explanations for any variance. Recruitment and employment records will be maintained in accordance with company record-retention requirements and applicable legal requirements to support compliance verification and audit activities.

##### **D. Employee Housing**

Saalex does not currently provide employee housing in connection with covered federal contracts. Should housing ever be provided by Saalex or its subcontractors in connection with a covered contract, such housing shall comply with all applicable host-country housing, health, safety, and labor requirements. Saalex will take appropriate measures to ensure that any housing provided is safe, sanitary, and consistent with applicable legal and contractual obligations.

##### **E. Contractors, Suppliers, and Agents**

Compliance with FAR 52.222-50 is mandatory for all contractors, suppliers, and agents Saalex Corp engages with. This requirement is to be flowed down to all sub-tier contractors, suppliers, and agents indirectly engaging in business with Saalex Corp. The substance of FAR 52.222-50 will be included in subcontracts and contracts with agents, with Compliance Plan requirements applying only to subcontract portions meeting the same prime contractor thresholds. Saalex Corp requires contractors, suppliers, and agents to comply with all applicable laws and regulations of the regions where they operate.

Saalex Corp reserves the right to inspect contractor premises for any FAR 52.222-50 violations, take appropriate actions if a problem arises, and terminate any contract should a violation report be substantiated. E. Reporting Violations Employees, contractors, suppliers, and agents who suspect a violation of FAR 52.222-50.

Saalex Corp will periodically assess subcontractor compliance through certifications, questionnaires, contract reviews, audits, and other due diligence activities, as appropriate, to verify compliance with FAR 52.222-50 and related anti-trafficking requirements.

#### F. Reporting Violations

Employees, contractors, suppliers, and agents may report concerns through Human Resources, the Chief Compliance Officer, management, the Security Department, or any company reporting mechanism. Reports may be made without fear of retaliation. Saalex will promptly investigate all credible reports and take appropriate corrective action. Reporting is mandatory for any information or knowledge of human trafficking. Individuals uncomfortable with internal reporting may contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email at [help@befree.org](mailto:help@befree.org). Retaliation for good-faith reporting will not be tolerated.

#### G. Corrective Action

Violations of this policy may result in disciplinary action up to and including termination of employment, removal from contract performance, termination of subcontract agreements, referral to law enforcement authorities, and any other corrective action deemed appropriate.

#### H. Posting

Saalex Corp displays FAR 52.222-50 Combating Trafficking in Persons posters with the Global Human Trafficking Hotline (U.S.) 1-844-888-HELP and email address [help@humantraffickinghotline.org](mailto:help@humantraffickinghotline.org). A copy of this plan is available on Saalex Corp's external website and may be provided to contractors, suppliers, and agents upon request.

#### I. Certifications

After conducting appropriate due diligence, Saalex certifies that, to the best of its knowledge and belief, neither Saalex nor its agents, subcontractors, or their agents have engaged in prohibited trafficking-related activities. If violations are identified, Saalex will take appropriate remedial and referral actions and implement corrective measures to prevent recurrence.

Saalex reserves the right to review records, conduct compliance assessments, and request certifications from contractors, subcontractors, suppliers, and agents to verify compliance with anti-trafficking requirements.

This policy applies to Saalex Corporation and all controlled subsidiaries, affiliates, joint ventures, employees, agents, contractors, subcontractors, and suppliers performing work under covered federal contracts.

REFERENCES: U.S. Regulation FAR 52.222-50

/Signature/

/PrintedName/

/DateSigned/

SLX00-00034

June, 2026

This document is uncontrolled when in hard copy format or stored in any electronic format other than an approved Saalex Governance System.

This is an official Saalex Policy, approved by *Jaime Bartkowski*, Saalex Chief Compliance Officer.