

Purpose

The United States Government has adopted a zero-tolerance policy regarding trafficking in persons and outlined in the [National Plan to Combat Human Trafficking](#). 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."

True to our core values, MasterWord is committed to a work environment that is free from all forms of human trafficking and sexual exploitation of children. As such, MasterWord is adopting zero-tolerance policy to all forms of human trafficking including but not limited to forced labor, unlawful child labor, sexual slavery, commercial sexual exploitation, and organ harvesting and sexual abuse of children in any form (in-person or online).

Scope

This policy applies to MasterWord's employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others through whom MasterWord conducts business. Every employee is responsible for reading, understanding, and complying with this policy.

MasterWord's 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 Human Resources (HR) Department.

Policy

MasterWord is committed to supporting the human rights of all individuals. MasterWord requires all employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others through whom MasterWord conducts business or who supplies goods or services to MasterWord to adhere to all applicable laws and regulations, always exhibit a high degree of integrity, and conduct themselves in a manner that is consistent with MasterWord's principles including but not limited to the elimination of slavery, sexual exploitation of children and human trafficking in all forms such as, forced labor, unlawful child labor, sexual slavery, commercial sexual exploitation, and organ harvesting, and sexual abuse of children in any form (in-person or online).

Procedures

Any employee having knowledge of credible information concerning actual or potential violation of this policy must report it immediately in accordance with MasterWord's Whistleblower Policy. Any potential violations or concerns regarding this policy should be reported immediately and investigated by the Human Resources Department.

Mandatory Reporting Laws

Employees who become aware of potential violations of the Human Trafficking Policy or any related laws or regulations have an immediate obligation to report these concerns to their supervisor or Human Resources representative so they may be reviewed and addressed in an ethical and responsible manner and further reported, if necessary. Timeliness of reporting any suspected violation is critical as the United



ANTI-HUMAN TRAFFICKING POLICY

States Government has imposed an especially stringent reporting obligation when there is credible information of violations. Employees may confidentially report possible violations by contacting the National Human Trafficking Hotline at 888-373-7888 or by texting INFO to 233733.

The MasterWord will not take any adverse action against employees for making an honest report of suspected human trafficking-related activities.

Please review the links provided below under the heading “Mandatory Reporting Laws and Resources”.

Violation of this Policy & Disciplinary Actions

MasterWord 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. MasterWord has the exclusive right to interpret this policy regarding their respective employees. Failure to report actual or potential illegal behavior or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment. Violation of the U.S. Government’s policy against human trafficking may also result in criminal prosecution of responsible individuals.

Counseling and Rehabilitation Programs

For those affected by human trafficking, MasterWord offers eligible employees the opportunity to participate in an Employee Assistance Program (EAP), a benefit program that provides assistance to employees who suffer from personal or emotional problems. Employees who have questions about their eligibility to participate in the EAP or the services offered by the EAP should contact the Human Resources Department. Participation is voluntary and completion of the program is the responsibility of the employee. All information an employee provides to MasterWord regarding his or her desire to seek treatment will be kept confidential and handled in accordance with applicable law. The Company will reasonably accommodate employees who are seeking treatment in accordance with applicable law.

Collaboration and Advocacy

The Company will collaborate with relevant governmental agencies, NGOs, industry associations, and other stakeholders to share best practices, exchange information, and advocate for stronger anti-human trafficking measures.

Policy Review

This policy will be reviewed periodically to ensure its effectiveness, relevance, and alignment with evolving legal requirements and best practices.

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's 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.

References & Resources

The National Action Plan to Combat Human Trafficking

<https://www.whitehouse.gov/wp-content/uploads/2021/12/National-Action-Plan-to-Combat-Human-Trafficking.pdf>

U.S. Government's federal regulation FAR 48 CFR § 52.222-50 - Combating Trafficking in Persons.

[https://www.acquisition.gov/far/52.222-50#:~:text=Agent%20means%20any%20individual%2C%20including,on%20behalf%20of%20the%20organization.&text=\(3\)%20The%20abuse%20or%20threatened%20abuse%20of%20the%20legal%20process.](https://www.acquisition.gov/far/52.222-50#:~:text=Agent%20means%20any%20individual%2C%20including,on%20behalf%20of%20the%20organization.&text=(3)%20The%20abuse%20or%20threatened%20abuse%20of%20the%20legal%20process.)

Federal Acquisition Regulation; Ending Trafficking in Persons

<https://www.federalregister.gov/documents/2015/01/29/2015-01524/federal-acquisition-regulation-ending-trafficking-in-persons>

Mandatory Reporting Laws & Resources

Texas Law: Reporting suspected abuse and neglect.

<https://www.txhealthsteps.com/static/courses/child-trafficking/sections/section-1-7.html>

Mandatory Reporting Requirements: Children Texas

<https://apps.rainn.org/policy/policy-state-laws-export.cfm?state=Texas&group=4>

Human Trafficking and Health Care Providers: Legal Requirements for Reporting and Education

<https://www.aha.org/system/files/media/file/2021/01/Introduction-to-Human-Trafficking-and-Health-Care-Providers-Legal-Requirements-for-Reporting-and-Education.pdf>

Human Trafficking Prevention and Awareness Requirements and Mandatory Reporting Reminders

<https://tea.texas.gov/about-tea/news-and-multimedia/correspondence/taa-letters/human-trafficking-prevention-and-awareness-requirements-and-mandatory-reporting-reminders>

Mandatory Reporting and HIPAA Compliance

[https://nhttac.acf.hhs.gov/system/files/2022-11/Mandatory%20Reporting_35533_Updating_SOAR_handouts_v04\(d\)_508.pdf](https://nhttac.acf.hhs.gov/system/files/2022-11/Mandatory%20Reporting_35533_Updating_SOAR_handouts_v04(d)_508.pdf)

Texas Administrative Code - RULE §61.1051 Reporting Child Abuse or Neglect, Including Trafficking of a Child

https://texreg.sos.state.tx.us/public/readtac%24ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=19&pt=2&ch=61&rl=1051

Reporting Trafficking

<https://humantraffickinghotline.org/en/report-trafficking>