



Garmat USA, LLC **Anti Human Trafficking Policy**

This Policy outlines the efforts Garmat is making to help eliminate human trafficking, slavery, forced labor and child labor from its chain of vendors, agents, service providers and vendors. This policy is designed to comply with, and support compliance with, the California Transparency in Supply Chains Act, the UK Modern Slavery Act and the requirements of Federal Acquisition Regulations 52.222-50 and 52.222-56.

This Policy applies to all Garmat USA, employees, agents, subcontractors, and suppliers when acting within their scope of employment or contracts with Garmat.

Garmat will not tolerate and will not condone the use of slavery, forced, involuntary or coerced labor, child labor, human trafficking or sex trafficking by any employee, agent, subcontractor or supplier in the operation or support of our business or the manufacture and distribution of our products. To that end, Garmat shall, and shall require that its businesses, employees, agents, subcontractors, and suppliers:

1. Not engage in any form of human trafficking, whether by force, fraud, or coercion; or any form of involuntary servitude or slavery; or any form of sex trafficking or the procurement of any commercial sex act;
2. Not knowingly use any form of forced or involuntary labor, including through the use of (a) threats of serious harm to, or physical restraint against, a person or another person; (b) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not perform such labor or services, that the person or another person would suffer serious harm or physical restraint; or (c) any abuse or threatened abuse of law or the legal process;
3. Not engage in, or support the use of child labor and shall comply with all applicable local child labor laws;
4. Not destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses;
5. Not use misleading or fraudulent practices during the recruitment of employees or offering of employment, and shall endeavor to the extent possible to disclose to employees, in a format and language accessible to the employee, the basic information 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 or arranged by Garmat) any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work. If required by law or contract, provide an employment contract, recruitment agreement, or other required work document in writing, which shall be in a language the employee understands;
6. Comply with all applicable local wages, benefit, and working hours labor laws;
7. Not charge employees recruitment fees and shall not use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
8. If Garmat, or Garmat supplier provides or arranges housing for employees, the housing shall meet the host country housing and safety standards.
9. Garmat shall periodically review and evaluate its internal operations and its supply chain to identify and assess the potential risks of activity that could violate this Policy.
10. As part of its employee training, Garmat includes training on human trafficking and slavery to employees.
11. Garmat suppliers and subcontractors who supply any product or service that is incorporated into the products or services we sell are required to review and comply with this policy. Such suppliers will be required to periodically certify that they

(a) have read and understand this Policy and (b) comply with the expectations in the Supplier Code of Conduct and the laws regarding human trafficking, slavery and labor standards of the country or countries in which they are doing business.

12. Any Garmat employee that is informed of or witnesses a violation of this Policy, or is uncertain about the proper course of action relating to the matters addressed in this Policy, is encouraged to immediately contact his or her supervisor. If the issue is not resolved or the employee is not comfortable raising the issue with his or her supervisor, the employee should use other reporting channels appropriate for your business unit.

For more information, employees, agents of Garmat, and suppliers may contact the Global Human Trafficking Hotline at 1-888-373-7888 or send text to beFree at (233733). For more information contact polarisproject.org.

Garmat has a zero tolerance policy regarding any of its employees, agents, subcontractors or suppliers who engage in or support the use of slavery, forced, involuntary or coerced labor, child labor, human trafficking or sex trafficking. Failure to comply with this Policy may result in disciplinary action up to or including termination of employment. If a subcontractor or supplier is found in violation of this policy, Garmat reserves the right to take prompt, remedial measures to address the violation, up to and including termination of the agent, supplier or subcontractor.

Adopted as of March 01, 2019

Acknowledgement

Signature: _____

Date: _____