

## ANTI-HUMAN TRAFFICKING / MODERN SLAVERY POLICY

### Introduction

According to the United Nations, human trafficking and modern slavery involve “the recruitment, transport, transfer, harboring, or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.” Both human trafficking and modern slavery affect virtually every country in the world and violate basic human rights.

Human trafficking and slavery are egregious violations of basic human rights that persist in our world today, staining our collective conscience. These heinous crimes prey upon the most vulnerable members of society, stripping them of their dignity, freedom, and autonomy. It is imperative that we stand together in solidarity to eradicate this abhorrent practice and ensure that every individual is afforded the right to live a life free from exploitation.

Together, we must strive to create a world where no human being is treated as a commodity, where every person's inherent worth and dignity are respected, and where justice prevails over exploitation.

### Policy

This Anti-Human Trafficking/Modern Slavery Policy identifies SOM's unwavering opposition to human trafficking and modern slavery.

SOM does not condone and will not tolerate human trafficking or forced labor. Our prohibition includes SOM, our employees, and third parties engaged by SOM and their respective employees. We will never knowingly conduct business with consultants, business partners, suppliers, vendors, or other third parties who violate anti-human trafficking laws.

Violations of our policy by our employees may result in discipline, including termination of employment, while violations by third parties may result in the exercise of contractual remedies, including termination of the contract, and referral to the appropriate legal authorities.

Prohibited misconduct includes participating in human trafficking, procuring commercial sex acts, using forced labor, denying employees access to identity or immigration documents, engaging in fraudulent or misleading recruitment practices, and failing to timely provide employment documents to employees in a language that the employee understands.

We will continue to develop, communicate, and maintain anti-human trafficking compliance programs tailored to the needs of SOM's projects and businesses. To the extent necessary, these programs shall address requirements for training, certification, due diligence, periodic risk assessments, and statutory reporting.

### Reporting of Concerns

All SOM personnel are responsible for ensuring compliance with this policy and its related procedure.

Any employee who reasonably believes SOM or any third party is conducting business with an entity engaging in any activity prohibited by this policy must promptly report the suspected misconduct.

### Requirements for United States Federal Government Contracts

All U.S. federal government contracts have anti-human trafficking requirements as set out in the Federal Acquisition Regulation (“FAR”) provisions and FAR supplemental regulations (including the Defense Federal Acquisition Regulation Supplement (“DFARS”).

Any failure to comply with these provisions and regulations can result in contract termination, suspension of payments, loss of award fee, suspension, or debarment and civil or criminal penalties for false statements/claims.

In addition to requirements applicable to all such United States federal government contracts, there are also additional requirements related to performance of professional services internationally for the United States federal government. For example, for certain federal contracts requiring performance outside the United States valued at more than \$500,000, SOM may be responsible for developing, communicating and maintaining anti-human trafficking compliance programs, providing training, certifying anti-human trafficking activities when required, conducting periodic risk assessments, investigating complaints, and taking prompt corrective action for human trafficking activities.

Also, for certain Department of Defense contracts, SOM must also post and enforce a bill of rights in locations where it is supporting the United States Armed Forces outside the United States. Employees who are responsible for execution and performance of federal contracts shall ensure that they implement these and other regulatory requirements.

*Doryse Franco*

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