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**Combating Trafficking in Persons and Modern Slavery  
Compliance Plan and Policy**

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*As of FY 25*

## **Combating Trafficking in Persons and Modern Slavery Compliance Plan and Policy**

### **Purpose**

This Combating Trafficking in Persons and Modern Slavery Compliance Plan and Policy represents and implements Devo's compliance with US Federal Acquisition Regulation 52.222-50 and the UK's Modern Slavery Act 2015. These laws and regulations requires all contractors of the Federal Government, and all companies doing business in the United Kingdom, to take action against human trafficking and slavery. This Plan and Policy applies to all directors, officers, and employees and contractors of Devo Technology, Inc and its affiliates (which, unless the context otherwise requires, are collectively referred to as "Devo" or "Company"). We refer to all persons covered by this Plan and Policy as "Company personnel" or simply "personnel."

### **Commitment**

Devo is committed to preventing slavery, human trafficking, and other forms of forced labor in our business and supply chain. Devo will not, and has not, entered into business with any organization which employs such actions in violation of law, nor will we allow such actions to take place in Devo.

### **Prohibitions on Slavery, Trafficking, and Adjacent Activities**

Devo and Personnel are prohibited from:

- Engaging in severe forms of trafficking in persons, including:
  - Sex trafficking in which a commercial sex act or prostitution is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age;
  - Recruiting, harboring, transporting, provisioning, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery;
  - Procuring commercial sex acts or prostitution during the period of performance of the contract;
- Using forced labor in the performance of the contract;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to that 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, such as failing to disclose, in a format and language understood by the employee or potential employee, 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 employer or agent provided or arranged), any

significant costs to be charged to the employee or potential employee, 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 employees or potential employees recruitment fees;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment:
  - For an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (for portions of contracts performed outside the United States), except for those who are legally permitted to remain in the country of employment and who choose to do so or exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation; or
  - For an employee who is not a United States national and who was brought into the United States for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the United States);
  - For an employee who is not a national of the country in which the work is taking place and is a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons, Devo shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. This shall not apply for those who are legally permitted to remain in the country of employment and who choose to do so or exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation;
  - Providing or arranging housing that fails to meet the host country housing and safety standards; or
  - If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

As required by law, Devo must take appropriate action against any Personnel who violate this policy, up to and including termination and referral to the appropriate government(s) and relevant law enforcement. If you are uncertain whether a particular action is prohibited, please contact the Legal Department for assistance.

### **Supply Chain Management**

Devo has a low risk of slavery, human trafficking, and other forms forced labor in our business and supply chain. Devo shall conduct a risk assessment of all vendors before purchasing goods or services. Most of Devo's suppliers are in low-risk areas and industries, but all Devo vendors are required to comply with prohibitions on slavery, human trafficking, and other forms of forced labor.

## **Reporting**

Any credible information received from any source (including host country law enforcement) that an employee, subcontractor, subcontractor employee, or agent has violated this Policy, that information must be reported immediately to the Company's General Counsel. If the General Counsel anticipates that the event may require reporting under FAR 52.222-50, the Modern Slavery Act, or other law or regulation, he or she immediately shall notify the necessary persons, including the cognizant Inspector General of the allegation and the Contracting Officer of any applicable federal government customer or other government entity as appropriate. Personnel may also report, without fear of retaliation, activity inconsistent with this Policy prohibiting trafficking in persons to the General Counsel, and the Global Human Trafficking Hotline (1-844-888-FREE; [help@befree.org](mailto:help@befree.org)).

## **Other Policies**

The requirements, prohibitions, and protections in this Plan and Policy are in addition to the prohibitions on illegal activities and forced labor in Devo's Code of Business Conduct and Ethics; Anti-Harassment; and Diversity, Equity & Inclusion Policies, and the protections for reporting in the Code of Business Conduct and Ethics and Devo's Whistleblower Policy.

## **Training; Periodic Reassessment of Plan and Policy**

Personnel are required to undergo training on activities prohibited by this Plan and Policy upon hire and annually thereafter. Devo will annually review, assess, and certify that all Personnel are compliant with this Policy, and that any Personnel who have committed a prohibited act, Devo has taken appropriate action.

## **Conclusion**

This Combating Trafficking in Persons and Modern Slavery Compliance Plan and Policy contains prohibitions required by law to combat human trafficking. If you have any questions about this Policy, please contact your supervisor or the Legal Department. We expect all Devo Personnel to adhere to these standards. This Plan and Policy and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. We reserve the right to amend, supplement or discontinue this Plan and Policy without prior notice at any time.

Approved by:

Signed by:

*Walter Scott*

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Walter Scott  
CEO and Chairman of the Board  
Devo, Inc.  
For FY 25