



Policy Against Human Trafficking and Modern Slavery

Please note that this policy may be reviewed and changed from time to time.



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Version Control

Version	Description	Author	Date
1.0	Initial Document (US only)	Debby Haskin	04/02/2021
1.1	Updated to Global Policy, updates to reach of policy	Bradley Spray	10/05/2024

Purpose

SFI Health is committed to a work environment that is free from human trafficking and slavery, which for the purposes of this policy includes forced labor and unlawful child labor.

SFI Health will not tolerate or condone human trafficking or slavery in any part of our organization.

SFI Health employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom SFI Health conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

Scope

This policy applies to all personnel employed by or engaged to provide services to SFI Health, including, but not limited to, employees, officers, and temporary employees of SFI Health and international subsidiaries, and independent contractors (for ease of reference throughout this policy, "employees").

Every employee is responsible for reading, understanding and complying with this policy. SFI Health Managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy.

Policy

SFI Health prohibits trafficking in persons and slavery. 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.
- Knowingly engaging suppliers whose standards and practices are in breach of this policy
- 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 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.

Procedure

SFI Health Employees are to report any conduct that they believe to be a violation of this policy to the Human Resources (HR) department. Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy.

Breaches and Obligations

SFI Health will not tolerate retaliation against an employee for reporting a concern in good faith or for co-operating with an 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, subject to applicable law. SFI Health and its subsidiaries have the exclusive right to interpret this policy regarding their respective employees.

Violation of applicable laws may also result in criminal prosecution of responsible individuals.

Approved by:

CEO SFI Group

May 2024