



Remedica

ANTI-HUMAN TRAFFICKING COMPLIANCE PLAN



ANTI-HUMAN TRAFFICKING COMPLIANCE PLAN

Contract Title	
Contract Number	
Period of Performance	
Contracting Agency	
Contracting Officer	
Name/Contact Information of the Person Responsible for this Plan	

This document sets forth Remedica’s Limited (hereinafter referred to as the “**Company**” and together with its subsidiaries as the “**Group**”) compliance plan (hereinafter referred to as the “**Plan**”) for the above-referenced contract (hereinafter referred to as the “**Contract**”), as required by section 52.222-50(h) of the U.S. Federal Acquisition Regulation (hereinafter referred to as the “**Regulation**”).

The Company opposes all forms of human trafficking and forced labor and is committed to refrain from any actions or omissions, during the materialization of all aspects of its business, associated with human trafficking and forced labor. All Employees of the Company, including full and part-time employees, as well as third parties and intermediaries authorized to act on Company’s behalf, including agents and distributors, vendors, suppliers, providers, contract workers, contractors, subcontractors, and their agents and employees (hereinafter referred to as the “Third Parties”) are required to comply with [Executive Order 13627](#), “*Strengthening Protections Against Trafficking in Persons in Federal Contracts*” (September 25, 2012) and the Regulation’s requirements related to combating trafficking in persons, including the Regulation. These legal requirements set forth the U.S. Government’s zero-tolerance policy regarding Government employees and contractor personnel engaging in trafficking in persons or the use of forced labor.

In accordance with the Regulation - Combating Trafficking in Persons, and for the purposes of this Plan, (a) “agent” means any individual, including a director, an officer, an employee or an independent contractor, authorized to act on behalf of any Group entity and (b) a “subcontractor” means any supplier, distributor, vendor, provider or firm that furnishes supplies or services to or for a Group entity.

1.0 ANTI-HUMAN TRAFFICKING POLICY AND RELATED PROHIBITIONS

All Employees of the Company and Third Parties authorized to act on Company’s behalf must comply with the Company’s Anti-Human Trafficking Policy (hereinafter referred to as the “**Policy**”), which is provided at **Appendix A**.



In connection with this Contract, pursuant to the Regulation 52.222-50(b) and consistent with Company's Policy, government contractors, contractor employees, subcontractors, subcontractor employees, and their agents are specifically prohibited from:

- ✓ Engaging in severe forms of trafficking of persons (i.e., through use of force, fraud, or coercion) during the period of performance of the Contract;
- ✓ Procuring commercial sex acts 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 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, such as failing to disclose, in a format and language understood by the employee or potential employee, basic information or making material misrepresentations during recruitment regarding the key terms and conditions of employment, including wages and fringe benefits, location of work, living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- ✓ Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place;
- ✓ Charging employees or potential employees recruitment fees;
- ✓ Failing to provide or pay the cost of return transportation upon the end of employment for certain employees as follows (subject to the exceptions of the Regulation):
 - For portions of contracts performed outside the United States, 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; and
 - For portions of contracts performed inside the United States, an employee who is not a U.S. 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;
- ✓ Providing or arranging housing that fails to meet the host country housing and safety standards; and



- ✓ If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document that is in writing in a language the employee understands, contains a detailed description of the terms and conditions of employment, and provides the content of applicable laws and regulations that prohibit trafficking in persons. If the employee must relocate to perform the work, the work document must be provided to the employee at least five days prior to the employee relocating.

Persons who violate the Company's Policy, the requirements of this Plan, and/or applicable laws and regulations (including the Regulation) may be subject to disciplinary action by the Company, depending on the gravity of the violation, up to and including dismissal from employment, or other actions as the Company determines to be appropriate.

2.0 EMPLOYEE AWARENESS PROGRAM

The Company has developed and implemented an awareness program to inform all Employees about the U.S. Government's prohibitions on engaging in trafficking-related activities, the particular activities prohibited, and the actions that will be taken against an employee for violations. This awareness program includes:

- ✓ **Training**, which is provided periodically to all Employees in a manner and on a schedule determined by the HR Team. Relevant Employees are trained on, among other things, the Policy, this Plan, consequences of violations, employee reporting mechanisms, and the U.S. Government's policy of prohibiting trafficking-related activities.
- ✓ **Communications and postings** of the relevant contents of this Plan, including at the workplace and on Company's website at www.remedica.eu.

3.0 RECRUITMENT AND WAGE PLAN

In all recruitment activities, whether conducted directly by the Company or by an agent:

- ✓ The Company strictly prohibits misleading or fraudulent practices during recruitment, such as failing to disclose or materially misrepresenting key terms and conditions of employment (e.g., wages, location of work, living conditions, related fees and costs).
- ✓ No recruitment fees may be charged to the employee.
- ✓ Employees must be provided with an employment contract, recruitment agreement, or other work document when required by law or contract. The contract must be provided in writing in a language the employee understands, contain a detailed description of the terms and conditions of employment, and, if applicable, be provided at least five days before the employee relocates to perform the work.



- ✓ The Company uses only recruitment companies that have trained employees.

All wages must meet applicable host-country legal requirements. If there is any variance, it must be explained and approved in writing in advance by the HR Team.

4.0 HOUSING PLAN

The Company provides living facilities options during the employment contract of the foreign employee complying with the Cyprus housing and safety standards.

The Company offers the foreign employees the following two options:

- ✓ The property to be rented in the name of the foreign employee and the Company to reimburse part of the rental amount to the foreign employee accordingly; or
- ✓ The property is rented in Company's name and the rental amount is settled directly by the Company.

5.0 PREVENTING AGENTS/SUBCONTRACTORS FROM ENGAGING IN TRAFFICKING IN PERSONS

The Company has instituted the following additional safeguards and procedures to prevent relevant agents and subcontractors from engaging in trafficking in persons:

- ✓ Subcontractors are required to fully cooperate with Company, contracting agencies, and other U.S. Government agencies that may conduct audits or investigations on compliance with the Regulation). Subcontractors must also agree, at the Company's discretion, to on-going monitoring and random auditing by the Company or its agents for compliance with the Company's Policy and this Plan. Any credible indication of noncompliance will be investigated, reported, and addressed, accordingly.
- ✓ If required by the Regulation a subcontractor or agent must provide to the Company an annual certification stating it has implemented a compliance plan to prevent any prohibited activities identified in the Regulation (52.222-50(b)). Subcontractors and agents may also be required to provide the Company with a copy of their compliance plan upon the Company's request under the Regulation (52.222-50(h)).

Failure to comply with the requirements of the Company's Policy, this Plan, and/or applicable laws and regulations will result in the Company taking any and all appropriate actions, up to and including immediate termination of the subcontractor's contract with the Company.

6.0 REPORTING AND REMEDIATION

Consistent with the Company's Policy, all Employees and Third Parties are encouraged to report any activity or condition that may violate this Policy or related legal or regulatory requirements.



- Reports may be made confidentially to the Compliance Team by e-mail to the e-mail address ComplianceRem@remedica.com.cy or to the HR Team at 25 553 000 or by e-mail to the e-mail address HumanResources@remedica.com.cy in accordance with the Whistleblowing Policy.
- Employees may also report their concerns directly to the Global Human Trafficking Hotline by phone at 1-844-888-FREE or email at help@befree.org.

The mere reporting of a violation or concern in good faith will not result in any adverse employment effects for the reporting person. The Company will take no retaliatory action for such reports, and all Employees should report violations without fear of retaliation. All reported concerns will be promptly investigated by the HR Team to determine appropriate remedial and preventive action, as necessary.

Present term is to be interpreted and adhered to in line with the Whistleblowing Policy.

In the event of the receipt of credible information alleging a violation of the Regulation, the Compliance Team and/or the HR Team will immediately:

- ✓ Take appropriate referral action with respect to the matter; and
- ✓ Take appropriate remedial and preventive action, up to and including in case of Employee, his/her dismissal and in case of Third-Party termination of business relationship.

This reporting process, and the Global Human Trafficking hotline and email address, have been made available to relevant employees as part of the Employee Awareness Program (Sections 2.0 and 6.0).

7.0 CERTIFICATIONS

The Company will provide certifications as required by the Regulation

Prior to award of a subcontract, and annually thereafter during performance of the Contract, the Company shall obtain from each subcontractor a certification as required by the Regulation in the following cases:

- ✓ if the subcontract is for supplies other than commercially available off-the-shelf items acquired outside the United States or services to be performed outside the United States and;
- ✓ has an estimated value exceeding \$550,000.

* * * *



Appendix A

ANTI-HUMAN TRAFFICKING POLICY

1. PURPOSE

As a responsible corporate citizen, Remedica Limited (hereinafter referred to as the “*Company*” and together with its subsidiaries as the “*Group*”) condemns and strictly prohibits all forms of human trafficking and forced labor and is committed to conducting its business in compliance with all applicable laws and regulations designed to prevent and prohibit the same. The Company is committed to refrain from any actions or omissions, during the materialization of its business, associated with human trafficking and forced labor. To that end all Employees and Third Parties (as defined in paragraph 2 below) must familiarize themselves with this Anti-Human Trafficking Policy (hereinafter referred to as the “*Policy*”) and the rules set out therein.

2. SCOPE

This Policy applies to all the Employees of the Company, including full and part-time employees. This Policy also applies to third parties and intermediaries authorized to act on Company’s behalf, including agents and distributors, vendors, suppliers, providers, contract workers, contractors, subcontractors and their agents and employees, to the extent applicable to their duties (hereinafter referred to as the “*Third Parties*”).

In accordance with Federal Acquisition Regulation (hereinafter referred to as the “*Regulation*”) clause 52.222-50 (hereinafter referred to as the “*Regulation*”) - Combating Trafficking in Persons, and for the purposes of this Policy, (a) “agent” means any individual, including a director, an officer, an employee or an independent contractor, authorized to act on behalf of any Group entity and (b) a “subcontractor” means any supplier, distributor, vendor, provider or firm that furnishes supplies or services to or for a Group entity.

3. NON-COMPLIANCE

The Company does not tolerate human trafficking, slavery, or any form of forced, indentured, involuntary, or child labor in the operation or support of its business. The Company’s Employees and Third Parties authorized to act on Company’s behalf shall not engage in any practice that constitutes human trafficking or forced labor.

Any failure to comply with the applicable laws and regulations designed to prevent and prohibit human trafficking and forced labor can result in significant criminal, civil and /or administrative penalties for both the Group and the Employee or Third Party involved. Such non-compliance can also negatively affect the Company’s public image, reputation, business opportunities, and market position.

Employees who breach this Policy may be subject to disciplinary action by the Company, depending on the gravity of the violation, up to and including dismissal from employment or other actions as the Company determines to be appropriate. Breach by a Third Party engaged to undertake any business or



services or supply of goods on behalf of or at the direction of any company of the Group may result termination of their business relationship with the Group.

In addition to disciplinary measures by the Group, an Employee who breaches the applicable laws and regulations designed to prevent and prohibit human trafficking and forced labor may be subject to criminal charges which could result in imprisonment and/or fines.

4. ANTI-HUMAN TRAFFICKING COMPLIANCE PLANS

The Company develops and institutes Anti-Human Trafficking Compliance Plans in connection with certain projects and the performance of certain contracts to ensure compliance with applicable laws and regulations, including the Regulation. These regulations prohibit U.S. Government contractors and their agents from engaging in any severe form of trafficking in persons, and support the U.S. Government's zero-tolerance policy regarding Government employees and contractor personnel engaging in trafficking in persons or the use of forced labor.

5. EMPLOYEE REPORTING AND REMEDIATION

All Employees are encouraged to report any activity or condition that may violate this Policy or related legal or regulatory requirements.

- ✓ Reports may be made confidentially to the Compliance Team by e-mail to the e-mail address ComplianceRem@remedica.com.cy or to the HR Team at 25 553 000 or by e-mail to the e-mail address HumanResources@remedica.com.cy in accordance with the Whistleblowing Policy.
- ✓ Employees may also report their concerns directly to the Global Human Trafficking Hotline by phone at 1-844-888-FREE or email at help@befree.org.

The mere reporting of a violation or concern in good faith will not result in any adverse employment effects for the reporting person. The Company will take no retaliatory action for such reports, and the Employees should report violations without fear of retaliation. All reported concerns will be promptly investigated by the HR Team to determine appropriate remedial and preventive action, as necessary.

Present term is to be interpreted and adhered to in line with the Whistleblowing Policy and Employee Handbook.

6. AUDITS AND MONITORING

The Company may conduct audits and testing periodically to assess compliance with this Policy, as well as to identify and remedy deficiencies or weaknesses. Audit and monitoring efforts are led by the Compliance Team and structured based on the risk profile of the Company's business activities.



7. COMPLIANCE AND SEEKING GUIDANCE

The Company's Employees and Third Parties authorized to act on Company's behalf are responsible for understanding and complying with the requirements of this Policy within the scope of their employment and responsibilities.

Employees and Third Parties are encouraged to seek guidance from the Compliance Team if they are uncertain whether a specific action would be in violation of this Policy or applicable laws and regulations.

8. OWNERSHIP

The Group is the owner of this Policy and must approve any revisions.

9. REFERENCES

This Policy should be read together with the Company's Code of Conduct and Ethics, the Whistleblower Policy and the Employee Handbook.

10. TRAINING

The Company is committed to building a transparent and ethical culture that ensures that all Employees act with integrity in all that the Company does. Therefore, the Company recognizes the importance of providing training to all Employees. In this respect, the Company will provide a mandatory training on this Policy to all Employees periodically in a manner and on a schedule determined by the Compliance Team.

11. REVISIONS

Paragraph No.	Rev.	Description of Change	Date	Initiated By

12. QUESTIONS AND DISTRIBUTIONS

All Employees must familiarize themselves with the specific terms of this Policy. However, for any concerns or suggestions regarding this Policy or even as to the scope of this Policy or the applicable laws they should contact the Compliance Team for guidance.

The Compliance Team can be reached by sending an email to ComplianceRem@remedica.com.cy.



Copies of this Policy shall be distributed to all Employees. The Company may choose to satisfy this distribution requirement by posting this Policy on its website or at its offices in a conspicuous location accessible to all Persons.

Head of Legal and Compliance Department: Elina Skoullou

Contact Number: (+357) 25 553 584

Email Address: E.Skoullou@remedica.eu

ComplianceRem@remedica.com.cy