
	Title: Anti-Trafficking Policy	Procedures	OWL-LG-PO-001
	Area: Legal Department	Initial Issue Date:	09/01/2022
	Approval: General Counsel	Version:	01
	Page 1 of 5	Revision Date:	05/30/2023

TABLE OF CONTENTS

1.0	PURPOSE	2
2.0	SCOPE	2
3.0	RESPONSIBILITY	2
4.0	DEFINITIONS	3
	4.1 HUMAN TRAFFICKING.....	3
	4.2 LABOR TRAFFICKING.....	3
	4.3 SEX TRAFFICKING.....	3
	4.4 COMMERCIAL SEXUAL EXPLOITATION OF CHILDREN.....	3
5.0	POLICY	3
	5.1 HUMAN TRAFFICKING PROHIBITED.....	3
	5.2 REPORTING.....	4
6.0	COMPLIANCE	4
	6.1 CODE OF CONDUCT: THE OWL COMMITMENT.....	4
	6.2 SUPPLIER/RESELLER CODE OF CONDUCT.....	4
	6.3 CODE OF FEDERAL REGULATIONS (CFR).....	4
7.0	REFERENCES & FORMS	5
	7.1 REFERENCE.....	5
	7.2 FORMS.....	5
8.0	RECORD RETENTION AND DISPOSITION	5
9.0	REVISION HISTORY	5

	Title: Anti-Trafficking Policy	Procedures	OWL-LG-PO-001
	Area: Legal Department	Initial Issue Date:	09/01/2022
	Approval: General Counsel	Version:	01
	Page 2 of 5	Revision Date:	05/30/2023

1.0 **PURPOSE**

This policy provides the direction for Owl Cyber Defense Solutions, LLC (Owl Cyber Defense) employees, business units, contractors, subcontractors, consultants, suppliers, resellers, and vendors or anyone else Owl Cyber Defense does business with, to identify, evaluate, and prevent Trafficking in Persons in accordance with the requirements in the United States Trafficking Victims Protection Act of 2000, Public Law 106-386, 22 U.S.C. Ch. 78, and the UN Protocol to Prevent, Suppress, and Punish Trafficking in Persons, UN General Assembly Resolution 55/25.

Owl Cyber Defense has a zero tolerance for any violation of the Anti-Trafficking laws.

2.0 **SCOPE**

This Anti-Trafficking Policy applies to all Owl Cyber Defense employees, business units, contractors, subcontractors, consultants, suppliers, resellers, and vendors or anyone else Owl Cyber Defense does business with (referred to herein as, “Covered Entities”). Implementation for employees is the responsibility of Human Resources at the time of hiring. Failure to abide by the policy is grounds for appropriate disciplinary action including immediate termination of employment with cause. Implementation for all others will be affected by Contracts, Procurement or Legal via express terms and conditions incorporating this Policy into covered contracting instruments awarded by Owl Cyber Defense. Failure to abide by the Policy is grounds for immediate termination of the contracting instrument(s) for default.

3.0 **RESPONSIBILITY**


It is the overall responsibility of Legal Department to implement and maintain this policy.

The Legal Department is responsible for:

- Annual Policy Review: Ensure an annual review of the Anti-Trafficking Policy. Redistribution of updates and changes of the policy electronically as required.
- Annual Training: Annual training on the *Code of Conduct*, *The Owl Cyber Defense Commitment*, inclusive of the *Anti-Trafficking Policy* reference and identification.
- Compliance Support: Address questions and concerns from representatives in a timely and thorough manner.

Contracts, Procurement or Legal is responsible for:

- Mandatory Procurement Contract Term: Ensure that all written agreements with any Owl Cyber Defense party that Owl Cyber Defense does business with include a standard provision contractually requiring compliance with each directive set forward in this *Anti-Trafficking Policy* in accordance with the guidance provided in section 2.0 Scope.
- Record Keeping: Maintain records and agreements inclusive of *Anti-Trafficking Policy* compliance for any Owl Cyber Defense party that Owl Cyber Defense does business with.

	Title: Anti-Trafficking Policy	Procedures	OWL-LG-PO-001
	Area: Legal Department	Initial Issue Date:	09/01/2022
	Approval: General Counsel	Version:	01
	Page 3 of 5	Revision Date:	05/30/2023

The Human Resources is responsible for:

- Ensuring implementation for employees at the time of hiring during on-boarding. Employees are required to acknowledge receipt of and familiarity with this policy in writing as a condition of employment.

4.0 **DEFINITIONS**

The following terms defined herein are provided for context and clarity and should be applied when associated with this Policy to help in understanding the requirements.

- A. Human Trafficking:** The recruitment, enticement, harboring, transporting, providing, obtaining, or maintaining, advertising, patronizing, or soliciting of a person, through the use of force, fraud, or coercion for the purpose of exploitation.
- B. Labor Trafficking:** The recruitment, enticement, harboring, transporting, providing, obtaining, or maintaining, advertising, patronizing, or soliciting 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.
- C. Sex Trafficking:** The recruitment, enticement, harboring, transporting, providing, obtaining, or maintaining, advertising, patronizing, or soliciting of a person, through the use of force, fraud, or coercion (or of a person who has not attained 18 years of age) for the purpose of a commercial sex act.
- D. Commercial Sexual Exploitation of Children:** Sexual abuse where remuneration in cash or in kind is made to the child or a third person(s). This includes prostitution, pornography, sex tourism, and other forms of human trafficking.


Additional definitions and examples are provided in Appendices I & II.

5.0 **POLICY**

Covered Entities shall be sensitive to situations that could raise questions or potential, apparent or actual incidents of Trafficking in Persons. As part of the purchasing community, Owl Cyber Defense Contracts or Procurement must be particularly aware of situations where an Anti-Trafficking violation could arise and ensure that they steer clear of actions/inactions that would place them in such a situation. In this regard, the interest of Owl Cyber Defense should always be placed first.

5.1 **Human Trafficking Prohibited**

Owl Cyber Defense condemns all forms of human trafficking and the commercial sexual exploitation of children. Owl Cyber Defense supports every person’s right to safety and security, especially children, who are most vulnerable. The protection of children from sexual exploitation is a moral imperative, and socially responsible policies and practices must reflect this principle. Owl Cyber Defense will strictly comply with all applicable laws and regulations regarding the prevention of human trafficking and the commercial sexual exploitation of children and will cooperate with law enforcement authorities to address any such instances of exploitation of which Owl Cyber Defense or its employees or any other Covered Entity have become a party to.

	Title: Anti-Trafficking Policy	Procedures	OWL-LG-PO-001
	Area: Legal Department	Initial Issue Date:	09/01/2022
	Approval: General Counsel	Version:	01
	Page 4 of 5	Revision Date:	05/30/2023

No Covered Entity may:

- Use or allow the use of any of Owl Cyber Defense’s facilities, resources or equipment (including Owl Cyber Defense’s computers and networks) for the viewing, storage, distribution, promotion or other use of materials in which children are depicted as engaging in any sexual act or are otherwise made an object for prurient interests;
- Enter into, on behalf of Owl Cyber Defense, or otherwise, any business relationships or any other arrangement with any organization which the employee has reason to believe participates in any way in human trafficking and the commercial sexual exploitation of children; or
- Use or allow the use of images or concepts that sexually exploit children.
- All Covered Entities must be vigilant and immediately report to Human Resources and/or Legal, as appropriate, all situations that come to their attention in Owl Cyber Defense’s premises or businesses where human trafficking and the commercial sexual exploitation of children is suspected or appears to be intended.
- Under no circumstances may Owl Cyber Defense’s funds, property (including electronic devices and Owl Cyber Defense’s supported technology) or personnel be used to further or support activities that participate in human trafficking and/or child exploitation.
- Any such violation of this policy will result in immediate termination of employment or the business relationship with Owl Cyber Defense, as applicable.
- Child Labor Exploitation: Owl Cyber Defense does not recruit child labor and supports the elimination of exploitative child labor. Owl Cyber Defense will cooperate with law enforcement authorities to address any such instances of exploitation of which Owl Cyber Defense becomes aware.

5.2 REPORTING

Any Owl Cyber Defense employee or Covered Entity who has evidence of or suspects a violation of this *Anti-Trafficking Policy* must report, in writing, his or her evidence or suspicion to the Owl Cyber Defense Legal Department.


In addition, Owl Cyber Defense has established and maintains an Ethics & Business Conduct email address (“ethics@owlcyberdefense.com”) to facilitate confidential reporting of potential or actual unlawful, unethical conduct or other ethics issues.

6.0 COMPLIANCE

6.1 Code of Conduct: The Owl Cyber Commitment

6.2 Supplier/Reseller Code of Conduct

6.3 Code of Federal Regulations (CFR)

	Title: Anti-Trafficking Policy	Procedures	OWL-LG-PO-001
	Area: Legal Department	Initial Issue Date:	09/01/2022
	Approval: General Counsel	Version:	01
	Page 5 of 5	Revision Date:	05/30/2023

7.0 REFERENCES and/or FORMS

These documents are referenced in or applicable to this procedure.

7.1 REFERENCE

Owl Cyber Defense (or the Supplier_Reseller, as applicable) Code of Conduct

7.2 FORMS

Owl Cyber Defense/entity subcontracts, purchase orders, consulting, reseller, and other third-party agreements.

8.0 RECORD RETENTION AND DISPOSITION

Record retention and disposition requirements will be in accordance of Owl Cyber Defense’s record retention policies and/or in accordance with specific contractual requirements.

9.0 REVISION HISTORY

Revision	Description of Change	Reason for Change	Update POC	Date
01	Update the Policy to include applicability to other covered entities, correct typos, and remove the Proprietary Legend	To make available on the intranet	J Reed	05/30/23