

Human Trafficking Policy

PURPOSE

ICAT Logistics is committed to ethical and lawful practices in all aspects of our business. We maintain a zero-tolerance policy toward human trafficking and forced labor of any kind. This policy affirms our dedication to upholding human rights and ensuring our operations, global supply chain, and partnerships reflect our commitment to dignity, respect, and compliance with applicable laws.

SCOPE

This policy applies to all employees, contractors, subcontractors, suppliers, and any third parties doing business with or on behalf of ICAT Logistics globally.

POLICY STATEMENT

ICAT Logistics prohibits all forms of human trafficking and forced labor, including but not limited to:

- Forced, bonded, or indentured labor
- Involuntary prison labor
- Child labor that violates local laws or international standards
- Commercial sexual exploitation
- Coercion or deception to compel services

ICAT Logistics complies with the United States Trafficking Victims Protection Act (TVPA), Executive Order 13627, and other applicable national and international regulations regarding human trafficking and labor rights.

PROHIBITED PRACTICES

The following activities are strictly prohibited:

- Destroying or withholding employee identity documents (e.g., passports or IDs)
- Charging recruitment fees to workers
- Using misleading or fraudulent recruitment practices
- Failing to provide return transportation for employees recruited from abroad (where legally required)
- Allowing or encouraging any form of coercion or involuntary service
- Engaging in or supporting commercial sex acts in connection with business activity

RESPONSIBILITIES

- **Employees and contractors** must immediately report any suspected violations to Human Resources or the Compliance Department.
- Suppliers and third-party vendors must certify compliance with this policy and agree to allow audits if required.
- Managers and leadership are responsible for promoting awareness and ensuring that this policy
 is implemented effectively.



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TRAINING AND AWARENESS

ICAT Logistics will provide relevant training to employees, especially those involved in recruiting, procurement, or operations in higher-risk regions. Training will include how to identify signs of trafficking and the proper channels for reporting concerns.

REPORTING AND NON-RETALIATION

ICAT encourages all individuals to report violations or concerns in good faith. ICAT strictly prohibits retaliation against any individual who reports suspected trafficking or participates in an investigation.

POLICY REVIEW

This policy will be reviewed annually and updated as needed to ensure compliance with evolving legal requirements and best practices.