

U.S. Export Capital Group, LLC (DBA: Nextrade Group) Human Trafficking Policy March 17, 2020

Purpose

U.S. Export Capital Group, LLC is committed to a work environment that is free from human trafficking and slavery. Company does not and will not tolerate or condone human trafficking – a modern day form of slavery – in any part of its organization or business relationships.

Trafficking in persons is an international crime involving the acquisition of a human being through the use of force, fraud or coercion, or in which the person induced to perform such act has not attained 18 years of age, for the purpose of exploiting the individual, adult or child, for profit through forced labor, prostitution or both. It constitutes a violation of human rights in which the victims are deprived of their fundamental freedoms.

As outlined in the U.S. Federal Acquisition Regulation (FAR 52.222-50) and Executive Order 13627 Strengthening Protections Against Trafficking in Persons in Federal Contracts, U.S. Export Capital Group, LLC is required to develop and maintain a compliance plan during the performance of contract(s) or subcontract(s) that is appropriate for the size and complexity of the contract or subcontract and the nature and scope of the activities performed, including the risk that the contract or subcontract will involve services or supplies susceptible to trafficking.

This document represents U.S. Export Capital Group, LLC's compliance plan and must be provided to any contracting officers upon request.

Combating Trafficking in Persons – Recruitment Activities and Employee Awareness

Introduction

Our global policies, procedures, and practices reflect our strong commitment to good corporate citizenship. This commitment underlies our stated values of integrity, rigor and excellence. Respect for human rights is an important part of being a good corporate citizen. This commitment applies to all employees and others who represent or act for us.

U.S. Export Capital Group, LLC recruits globally the best qualified talent to support business mission, goals, and services. This includes U.S. Citizens, local country nationals, and third country nationals who perform work on contracts outside the United States and abroad.

Employees, agents, subcontractors, and recruiters play a key role in preventing human trafficking and related activities. Human trafficking and related activities include harboring, transportation, provision, 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. To minimize the risk of human trafficking and to comply with contractual requirements regarding human trafficking and related activities, U.S. Export Capital Group, LLC employs a

multifaceted approach to address the risk of human trafficking and related activities outlined below.

The U.S. Export Capital Group, LLC compliance program applies to all U.S. Export Capital Group, LLC employees and others who represent or act for us.

Supplier Code of Conduct

U.S. Export Capital Group, LLC will ensure all contracts with external recruitment agencies or firms include the following contract clauses, as applicable, to facilitate compliance with contract requirements regarding human trafficking, in addition to requiring such agencies or firms to adhere to all applicable local, state, and national government laws:

FAR 52.222-50 Combating Trafficking in Persons (applies to all subcontracts and contracts with agents).

DFARS 252.203-7004 Display of Hotline Posters per Annex I, as appropriate (applies to subcontracts under Department of Defense prime contracts that exceed \$5 million except when the subcontract is for the acquisition of a commercial item).

DFARS 252.225-7040 Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States (applies to subcontracts under Department of Defense prime contracts that require subcontractor personnel to be available to deploy with or otherwise provide support in the theater of operations to U.S. military forces deployed outside the United States in (1) contingency operations; (2) humanitarian or peacekeeping operations; or (3) other military operations or exercises designated by the Combatant Commander).

Recruitment

U.S. Export Capital Group, LLC's recruitment efforts must adhere to all internal policies (domestic and international) and host-country recruitment standards to combat trafficking in persons and trafficking related activities.

U.S. Export Capital Group, LLC prohibits charging of recruitment fees, as defined in FAR 52.222-50, to employees and prospective employees and prohibits the use of any recruiting firms unless the firm's employees have received training on combating trafficking related activities. Adherence to recruitment processes, U.S. Export Capital Group, LLC international recruitment policies, as well as other host-country recruitment standards is required of individuals responsible for recruitment on behalf of U.S. Export Capital Group, LLC.

Employee Awareness Program

U.S. Export Capital Group, LLC policy Combating Trafficking in Persons is published on U.S. Export Capital Group, LLC's contracts to employees and is one of the primary tools utilized for employee awareness. All employees are required to comply with FAR 52.222-50, Combating

Trafficking in Persons, and specifies that violations may result in disciplinary action, up to and including termination of employment.

U.S. Export Capital Group, LLC's awareness program includes a communications plan to ensure ongoing awareness is provided (e.g., corporate policy statement, and electronic worksite posters, posters attached to contracts, as displayed in Annex I).

Training and other Assistance

U.S. Export Capital Group, LLC will seek to develop and maintain training modules that support our commitment to human rights, including child or forced labor, trafficking of persons, adherence to labor laws, including adherence to truthful and trustworthy practices during the recruitment of employees or offering of employment, proper disclosure of information, and proper representations during the recruitment process to include key terms and conditions of employment, wages, fringe benefits, work location, housing, and nature of work. As this program evolves, employees will be required to affirm their understanding of the policy. Should an employee be unsure of what to do in a particular situation or for guidance on any aspect of the policy, they should consult the CEO for guidance on the policies, procedures, or the law.

Process for Reporting Violations

Any credible information received from any source (including host country law enforcement) that an employee, subcontractor, subcontractor employee, or agent has violated FAR 52.222-50 must be reported immediately to company CEO.

Employees may also report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons to the Global Human Trafficking Hotline (1-844-888-FREE; help@befree.org).

If a violation of FAR 52.222- 50 is substantiated: U.S. Export Capital Group, LLC counsel will prepare a written draft report of the violation and investigation and provide it to the CEO. Legal Counsel will also submit the final report to the cognizant Contracting Officer. The final report will include any other related disclosures required under FAR 52.203-13.

All reports are to be made as soon as reasonably practicable. If there is a disagreement about whether the event in question constitutes a reportable violation or provides a reasonable basis for voluntary disclosure, CEO will make the final decision whether to submit the report to the contracting agency.

The Company will take all reports seriously and will follow applicable Company policies and procedures as well as project-specific operational procedures. All parties will be treated fairly and malicious or deliberately false allegations will be subject to disciplinary action, including termination. Based on the allegation, where appropriate, the reports may be forwarded to relevant local law enforcement authorities, as available.

In addition to the company's whistleblower policy, where there are suspicions or allegations of improper conduct of any kind in relation to a project funded by the UK Government, a report can be made to the Counter Fraud and Whistleblowing Unit (CFWU) at fraud@dfid.gov.uk or on +44 (0)1355 843747. As a further alternative, if Representatives are based in the UK, they can report incidents or behaviors through the Modern Slavery Helpline on 0800 0121 700.

The Child Trafficking Advice Centre (CTAC), part of the UK National Society for the Prevention of Cruelty to Children (NSPCC), operate a child trafficking advice and information line which offers direct assistance to professionals dealing with children who show signs of having been trafficked.

They have a national remit and are staffed by qualified social workers and a police liaison officer. They can offer staff in the Competent Authority advice on how to address the child's needs and your statutory duties in regard to safeguarding children from harm, and offer guidance by phone and a case consultancy service by appointment in addition to free training on child trafficking. The advice line number is 0808 800 5000.

Periodic Reassessment of the Plan

U.S. Export Capital Group, LLC will periodically review and assess the internal controls assuring compliance with this Plan. Modification of controls and measures will be implemented as required.

Trafficking in Persons Compliance Plan for Global Supply Chain Contracts

U.S. Export Capital Group, LLC may use subcontractors in the performance of its contracts. This includes domestic U.S. suppliers that perform work under contracts outside the United States and international subcontractors that perform work throughout the world.

Subcontractors play a key role in preventing human trafficking and related activities. To minimize the risk of human trafficking in its supply chain, and to comply with contractual requirements to prevent human trafficking in connection with U.S. Export Capital Group, LLC's contracts, U.S. Export Capital Group, LLC employs a multifaceted approach to address the risk of human trafficking in its supply chain.

Monitoring of Government Databases

U.S. Export Capital Group, LLC monitors the U.S. Government's System for Award Management (SAM) Exclusions database and other restricted parties lists and complies with applicable limitations on award to debarred, suspended, proposed for debarment, or otherwise restricted subcontractors.

Flowdowns

Subcontracts include mandatory flow down clauses necessary to ensure compliance with this Plan and the requirements of prime contracts. This includes the following:

FAR 52.222-50 Combating Trafficking in Persons (applies to all subcontracts and contracts with agents).

DFARS 252.203-7004 Display of Hotline Posters (applies to subcontracts under Department of Defense prime contracts that exceed \$5 million, except when the subcontract is for the acquisition of a commercial item).

252.225-7040 Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States (applies to subcontracts under Department of Defense prime contracts that require subcontractor personnel to be available to deploy with or otherwise provide support in the theater of operations to U.S. military forces deployed outside the United States in (1) contingency operations; (2) humanitarian or peacekeeping operations; or (3) other military operations or exercises designated by the Combatant Commander)).

Contractual Requirements for Compliance with Applicable Laws

U.S. Export Capital Group, LLC's subcontract terms and conditions require subcontractors to comply with applicable laws and regulations.

A typical provision reads as follows: SUPPLIER, in the performance of this Contract, shall comply with all applicable local, state, and federal laws, orders, rules, regulations, and ordinances. SUPPLIER shall procure all licenses/permits, pay all fees, and other required charges and shall comply with all applicable guidelines and directives of any local, state and/or federal governmental authority.

Certifications

U.S. Export Capital Group, LLC will obtain trafficking in persons certifications from subcontractors required to certify under FAR 52.222-50. Certificates will be required before award of subcontracts and annually thereafter when performance extends beyond one year.

Obtaining and Reviewing Supplier Compliance Plans

U.S. Export Capital Group, LLC will require subcontractors to provide copies of their trafficking in persons compliance plan upon request of either the contracting officer or U.S. Export Capital Group, LLC. Plans may also be required when needed in conducting due diligence of supplier compliance.

Among the disclosures required is whether the subcontractor has been convicted of, indicted or otherwise charged by any governmental entity for the commission of among other things, violation of human trafficking or child labor laws. Subcontractors are required to inform U.S. Export Capital Group, LLC if their status changes. If a supplier discloses a violation, the matter will be investigated and appropriate action taken.

Supplier Code of Conduct

U.S. Export Capital Group, LLC maintains a Supplier Code of Conduct which is referenced on all purchase orders. It includes the following:

We expect our suppliers to not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

Monitoring of Contracts Performed Outside the United States

When U.S. Export Capital Group, LLC personnel are present in international areas where subcontractors are performing work, the activities of the subcontractors will be monitored for potential trafficking problem or issues. If issues are suspected or found, the matter will be investigated and appropriate action taken.

Monitoring Third Party Sources of Information

U.S. Export Capital Group, LLC monitors third party information including international news sources. If adverse information concerning a U.S. Export Capital Group, LLC supplier is discovered, the matter will be investigated and appropriate action taken.

Investigations

U.S. Export Capital Group, LLC will investigate evidence or allegations that subcontractors have violated human trafficking prohibitions. Subcontractors are required by U.S. Export Capital Group, LLC's terms and conditions of purchase to "provide reasonable cooperation to U.S. Export Capital Group, LLC in conducting any investigation regarding the nature and scope of any failure by [the subcontractor] or its personnel to comply with applicable local, state, and national and federal laws, orders, rules, regulations, and ordinances that may affect the performance of [the subcontractor's] obligations under this Contract." U.S. Export Capital Group, LLC will make appropriate disclosures to the U.S. Government of violations by subcontractors and cooperate with any Government investigation.

Remedies

U.S. Export Capital Group, LLC will take appropriate action when subcontractors are found to engage in prohibited conduct, including the remedies specified in FAR 52.222.50. Where appropriate or required, U.S. Export Capital Group, LLC will coordinate with the U.S. Government prior to the implementation of remedies against subcontractors.

Eligibility for Future Contracts

The record of a subcontractor's compliance with human trafficking requirements will be considered in making future subcontractor source selections. Subcontractors that have engaged in prohibited conduct may be excluded from eligibility of future awards.

Training and Other Assistance

U.S. Export Capital Group, LLC will make training materials available to subcontractors and provide other assistance to suppliers upon request.

Annex I – Electronic Worksite Posters



HUMAN TRAFFICKING

WHAT YOU CAN DO ABOUT IT



LOOK

FOR SIGNS THAT SOMEONE
MAY BE TRAFFICKED

- Unable to leave their job
- Does not control their earnings
- Unable to move freely or is being watched or followed
- Is afraid to speak in the presence of others
- Shows signs of being assaulted or otherwise harmed (denial of food, water, sleep, medical care)
- Passports and other documents have been taken away
- Has been cheated into paying debt



REPORT

WHAT YOU SEE

- National Trafficking Hotline
1-888-373-7888
- Immigration and Customs Enforcement Hotline
1-866-347-2423
- www.dhs.gov/humantrafficking



BUY

PRODUCTS WITHOUT
TRAFFICKING IN THEIR
SUPPLY CHAINS



Cocoa



Electronics
(Conflict Minerals)



Coffee



Agriculture