

Purpose

MasterWord Services, Inc. (“MasterWord”) is committed to upholding human rights and ethical principles in all aspects of our organization by eliminating potential human rights violations related to our supply chain and our business operations. This policy sets forth MasterWord’s approach to raise awareness and combat the sexual exploitation of children and human trafficking in all forms including but not limited to forced labor, unlawful child labor, sexual slavery, commercial sexual exploitation, organ harvesting, and sexual abuse of children in any form (in-person or online).

Scope

This policy applies to MasterWord’s employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others through whom MasterWord conducts business, or who supplies goods or services to MasterWord.

Policy

MasterWord is committed to conducting business in a way that promotes corporate environmental and social responsibility. The company ensures that it operates in compliance with applicable laws and regulations while supporting the human rights of all individuals. MasterWord requires all employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others through whom MasterWord conducts business or who supplies goods or services to MasterWord to adhere to all applicable laws and regulations, always exhibit a high degree of integrity, and conduct their business in a manner consistent with MasterWord’s labor principles, including the elimination of slavery, sexual exploitation of children and human trafficking in all forms such as, forced labor, unlawful child labor, sexual slavery, commercial sexual exploitation, and organ harvesting, and sexual abuse of children in any form (in-person or online).

Throughout the term of the business relationship, MasterWord requires its suppliers (“Suppliers”), their employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom MasterWord conducts business or who supplies goods or services to MasterWord to avoid complicity in any practice that constitutes trafficking in persons or slavery. Therefore, Suppliers shall adhere to the U.S. Government’s federal regulation [FAR 48 CFR § 52.222-50 - Combating Trafficking in Persons](#).

Prohibited trafficking related activities outlined in the [FAR 48 CFR § 52.222](#) includes, but is not limited to the following:

- Engaging in any form of trafficking in persons.
- 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's 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.

To avoid collusion in any practice that constitutes trafficking in persons or slavery MasterWord requires the Suppliers to:

- Have in place and enforce appropriate policies and procedures that prohibit employees from engaging in any sex trafficking activity of any kind, whether on company or personal time, or engaging in any sex buying activities of any kind during company time, while working on company business, or while engaged in work-related activities (including business travel), or using any company or work properties or resources whatsoever.
- Notify its employees of these prohibitions.
- Impose appropriate remedies for any violations, up to and including termination of the applicable relationship or agreement.

Supplier Due Diligence

MasterWord expects its suppliers to conduct due diligence within their own supply chains to identify and mitigate risks related to all forms of human trafficking and modern slavery. This includes assessing the practices of their own suppliers and subcontractors.

Mandatory Reporting Laws

The prevention, detection and reporting of human trafficking in any part of our business or supply chain is the responsibility of all those working within it. Suppliers shall promptly report any known or suspected violations of this policy to MasterWord. In cases where violations are identified, suppliers must implement corrective action to remedy the situation and prevent further occurrences.



Employees, suppliers, and third-party providers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy. Failure to report any violation of this policy in any part of our business or supply chain will result in termination of the business agreement. Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

MasterWord prohibits any form of retaliation against individuals who report in good faith or cooperate with investigations related to human trafficking concerns. Suppliers may confidentially report possible violations by contacting the National Human Trafficking Hotline at 888-373-7888 or by texting INFO to 233733.

Audit and Compliance

MasterWord reserves the right to conduct audits or assessments of suppliers' operations to ensure compliance with this policy. Suppliers shall cooperate fully with such audits and provide access to relevant records.

Violation of Policy

If during the term of the business relationship, this policy is violated by the Supplier and sex buying and/or sex trafficking or trafficking in persons activities occurred, or are alleged to have occurred in connection with or in the course of the Supplier's operations or business, as determined at MasterWord's sole discretion, it will constitute a material breach of any formal agreement between the two parties allowing MasterWord to terminate the business agreement immediately upon written notice to the Supplier.

Collaboration and Advocacy

The Company will collaborate with relevant governmental agencies, NGOs, industry associations, and other stakeholders to share best practices, exchange information, and advocate for stronger anti-human trafficking measures.

Implementation and Policy Review

This policy is integral to our business operations. It is the responsibility of all suppliers to understand and comply with this policy. MasterWord will regularly review and update this policy as necessary to ensure its effectiveness and alignment with evolving legal requirements and industry best practices.

By adhering to this policy, MasterWord and its suppliers contribute to the prevention of human trafficking and modern slavery in the global supply chain. We are committed to working together to uphold the highest ethical standards and protect the rights and dignity of all workers.

References & Resources

The National Action Plan to Combat Human Trafficking

<https://www.whitehouse.gov/wp-content/uploads/2021/12/National-Action-Plan-to-Combat-Human-Trafficking.pdf>

U.S. Government's federal regulation FAR 48 CFR § 52.222-50 - Combating Trafficking in Persons.

[https://www.acquisition.gov/far/52.222-50#:~:text=Agent%20means%20any%20individual%2C%20including,on%20behalf%20of%20the%20organization.&text=\(3\)%20The%20abuse%20or%20threatened%20abuse%20of%20the%20legal%20process.](https://www.acquisition.gov/far/52.222-50#:~:text=Agent%20means%20any%20individual%2C%20including,on%20behalf%20of%20the%20organization.&text=(3)%20The%20abuse%20or%20threatened%20abuse%20of%20the%20legal%20process.)

Federal Acquisition Regulation; Ending Trafficking in Persons

<https://www.federalregister.gov/documents/2015/01/29/2015-01524/federal-acquisition-regulation-ending-trafficking-in-persons>

Mandatory Reporting Laws & Resources

Texas Law: Reporting suspected abuse and neglect.

<https://www.txhealthsteps.com/static/courses/child-trafficking/sections/section-1-7.html>

Mandatory Reporting Requirements: Children Texas

<https://apps.rainn.org/policy/policy-state-laws-export.cfm?state=Texas&group=4>

Human Trafficking and Health Care Providers: Legal Requirements for Reporting and Education

<https://www.aha.org/system/files/media/file/2021/01/Introduction-to-Human-Trafficking-and-Health-Care-Providers-Legal-Requirements-for-Reporting-and-Education.pdf>

Human Trafficking Prevention and Awareness Requirements and Mandatory Reporting Reminders

<https://tea.texas.gov/about-tea/news-and-multimedia/correspondence/taa-letters/human-trafficking-prevention-and-awareness-requirements-and-mandatory-reporting-reminders>

Mandatory Reporting and HIPAA Compliance

[https://nhhtac.acf.hhs.gov/system/files/2022-11/Mandatory%20Reporting_35533_Updating_SOAR_handouts_v04\(d\)_508.pdf](https://nhhtac.acf.hhs.gov/system/files/2022-11/Mandatory%20Reporting_35533_Updating_SOAR_handouts_v04(d)_508.pdf)

Texas Administrative Code - RULE §61.1051 Reporting Child Abuse or Neglect, Including Trafficking of a Child

https://texreg.sos.state.tx.us/public/readtac%24ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tl oc=&p_ploc=&pg=1&p_tac=&ti=19&pt=2&ch=61&rl=1051

Reporting Trafficking

<https://humantraffickinghotline.org/en/report-trafficking>