

## **Forced Labor and Human Trafficking Policy**

Sevenson Environmental Services, Inc. is committed to promoting ethical and lawful employment and labor practices. These practices are also required to be followed by Sevenson's suppliers and subcontractors. It is Sevenson's policy to comply with all labor laws.

### **Scope**

The following Policy applies to all Sevenson employees, subcontractors, and suppliers. Sevenson employees are responsible for reading, understanding, and complying with this Policy.

### **Policy Statement**

Sevenson prohibits trafficking in person, forced labor, child labor, and slavery. Sevenson employees, subcontractors, suppliers, and others through whom Sevenson conducts business must not engage in any practice that constitutes trafficking in persons or slavery. Such persons and companies:

- Will not use forced or compulsory labor, i.e., any work or service that a worker performs involuntarily, under threat of penalty
- Will ensure that the overall terms of employment are voluntary
- Will comply with the minimum age requirements prescribed by applicable laws unless a specific contract contains stricter age requirements
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements
- Will abide by applicable law concerning the maximum hours of daily labor
- Will not destroy, conceal, confiscate, or otherwise deny access by an individual to the individual's identity or immigration documents, such as passports or driver's licenses, regardless of issuing authority

- Will not use misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions, such as failing to disclose or making material misrepresentations during the recruitment process regarding the terms and conditions, including wages and benefits, the location of the work, the living conditions housing and associated costs, and the hazardous nature of the work
- Will not use recruiters that do not comply with this country's labor laws

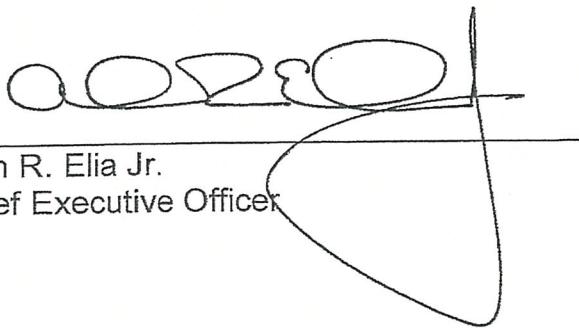
## **Policy Compliance**

Report any conduct that you believe to be a violation of the Policy, to a supervisor, manager, or Human Resources. Reports can also be made to the Ethical Advocate hotline at 866-764-9861 or online at <https://sevenson.ethicaladvocate.com>. Ethical Advocate will allow anonymous reporting as permitting by applicable law.

Sevenson will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

A violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

Sevenson Environmental Services, Inc. is committed to maintaining and improving its systems and processes to eradicate human trafficking, forced labor, child labor, and slavery in its daily practices and business relationships.

A handwritten signature in black ink, appearing to read 'Alan R. Elia Jr.', is written over a horizontal line. The signature is stylized with loops and a large, sweeping flourish that extends downwards and to the right.

Alan R. Elia Jr.  
Chief Executive Officer

February 1, 2021