

Anti-Human Trafficking/Modern Slavery Policy

1.0 Purpose

The Shimmick Companies (“Shimmick”) is opposed to human trafficking and modern slavery in all forms and is supportive of all laws prohibiting such action and will ensure the risk of such practices is mitigated within the business.

Accordingly, Shimmick establishes this anti-human trafficking/modern slavery compliance policy. Human trafficking/modern slavery is defined to include, but it not necessarily limited to, recruiting, harboring, transporting, provisioning, or receiving persons for labor or services by means of threat, force, deception, fraud, or abuse of power for purposes of exploitation. It affects virtually every country in the world and is a violation of basic human rights.

2.0 Policy

Shimmick does not condone and will not tolerate the use of human trafficking or forced labor. This prohibition extends to Shimmick and its employees, as well as any third parties engaged by Shimmick and their respective employees. Shimmick will not knowingly conduct business with subcontractors, business partners, suppliers, vendors, or other third parties who violate anti-human trafficking laws. Violations of this policy by Shimmick employees may result in discipline, up to and including termination of employment. Further, violations by third parties (including, but not limited to, vendors, subcontractors, or other contracted employees) may result in exercise of applicable remedies, including contractual remedies such as termination of the contract.

Any employee who has reason to believe Shimmick or any of its third parties is conducting business with an entity engaging in any activity prohibited by this policy must promptly report the suspected misconduct to Management, Human Resources, Legal, or the Shimmick Ethics Hotline (ethics@shimmick.com; 833-723-2022).

If the employee does not feel comfortable reporting this information internally, they should contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email help@befree.org. Retaliation against an individual who has reported a violation will not be tolerated.

Prohibited activities include, among other things, engaging or participating in human trafficking, procuring commercial sex acts, using forced labor, denying employees access to identity or immigration documents, engaging in fraudulent or misleading recruitment practices, using third party recruiters who have not represented that they comply with local labor laws, charging recruitment fees to employees, providing housing that does not meet host country standards, and failing to timely provide employment documents to employees in a language that the employee understands.

All Shimmick personnel are responsible for ensuring compliance with this policy and its related procedure. As necessary, Shimmick will develop, communicate, and maintain additional anti-human trafficking compliance programs tailored to the needs of specific Shimmick projects. To the extent necessary, these programs shall address requirements for training, certification, due diligence, periodic risk assessments, and statutory reporting.

3.0 Additional Requirements for U.S. Federal Government Contracts

In addition, this policy applies to all acquisition activities and performance of work in support of contracts or subcontracts with the US Government without exception, as required by the US

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Government. All U.S. federal government contracts have additional anti-human trafficking requirements as set out in the Federal Acquisition Regulation (“FAR”) provisions and FAR supplemental regulations (including the Defense Federal Acquisition Regulation Supplement (“DFARS”)). The failure to comply with these federal regulations can lead to contract termination, suspension of payments, loss of award fee, suspension, or debarment and civil or criminal penalties for false statements/claims.

In addition to requirements applicable to all U.S. federal contracts, for certain federal contracts requiring performance outside the U.S. valued at more than \$550,000, Shimmick is responsible for developing, communicating and maintaining anti- human trafficking compliance programs, providing training, certifying anti-human trafficking activities when required, conducting periodic risk assessments, investigating complaints, and taking prompt corrective action for human trafficking activities. For certain Defense Department contracts, Shimmick must also post and enforce a bill of rights in locations where it is supporting U.S. Armed Forces outside the U.S.

The relevant requirements for U.S. federal contracts and links to the relevant FAR and DFARS sections are included in the Human Trafficking Compliance Plan – US Regulation FAR 52.222-50. Employees who are responsible for execution of federal contracts shall ensure that they implement these additional regulatory requirements.

4.0 Review and Communication

This policy and subordinate procedures will be reviewed no less frequently than annually. This policy will be published in The Source Policy Library.