



Sunshine Minting Inc. Anti-Human-Trafficking Policy

Purpose:

Sunshine Minting Inc. is committed to a work environment that is free from human trafficking and slavery. Sunshine Minting Inc. will not and does 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 is not 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. This Policy is consistent with Sunshine Minting Inc.' Code of Ethics and Standards of Conduct. It also complies with the requirements of Federal Acquisition Regulation Subpart 22.17 and 52.222-50.

https://www.acquisition.gov/sites/default/files/current/far/html/Subpart%2022_17.html

<https://www.acquisition.gov/far/52.222-50>

Scope:

The Policy applies to all personnel employed by or engaged to provide services to Sunshine Minting Inc., including, but not limited to, employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (collectively herein referred to as "employees"). Every Sunshine Minting Inc. employee is responsible for reading, understanding and complying this this Policy.

Policy:

The United States and Sunshine Minting Inc. have a policy prohibiting human trafficking and trafficking-related activities. Pursuant to U.S. and Sunshine Minting Inc. Policy, forced, bonded (including debt bondage) or indentured labor, commercial sex, involuntary prison labor, slavery, or trafficking of persons shall not be used or tolerated. This includes transporting, harboring, recruiting, transferring or receiving persons for labor or services by means of threat, force, coercion, abduction or fraud for the purpose of involuntary servitude, peonage, debt bondage or slavery. Further, as required by law, and pursuant to the Policy, Sunshine Minting Inc., its employees, contractors, subcontractors, agents, vendors, suppliers, partners and others through whom Sunshine Minting Inc. conducts business, **shall not:**

- 1. Engage in any form of trafficking in persons during the performance of the contract;**
- 2. Procure commercial sex acts during the performance of the contract;**
- 3. Use forced labor in the performance of any work related to the contract;**
- 4. Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;**

5. **Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key items and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided or arranged by Sunshine Minting Inc. or its agent), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;**
6. **Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;**
7. **Charge applicants/candidates/employees recruitment fees;**
8. **If required by law or contract, fail to provide return transportation or fail to pay for the cost of return transportation upon the end of employment;**
9. **If required by law or contract, fail to provide or arrange housing that meets the host country housing and safety standards; or**
10. **If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five (5) days prior to the employee relocation. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.**

Each employee, contractor, subcontractor, and agent of Sunshine Minting Inc. is responsible for ensuring compliance with this Policy. Any violation of this Policy could result in disciplinary action, up to and including, removal from a contract, reduction in benefits, termination of a business relationship, or termination of employment, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

Investigations and Audits:

Sunshine Minting Inc. may perform investigations and audits to verify that business is being conducted in compliance with this Policy. All Sunshine Minting Inc. employees and third parties through whom Sunshine Minting Inc. conducts business are required to fully and promptly cooperate with any auditors and investigators and must respond fully and truthfully to any inquiries and requests for documents. Any failure to fully cooperate or hinder an investigation or audit may be grounds for disciplinary action, up to and including termination, subject to applicable law.

Reporting:

Credible information regarding a potential violation of this Policy, whether by an employee, contractor, subcontractor, agent, vendor, supplier, partner, and others through whom Sunshine Minting Inc. conducts business, must be immediately reported to the Human Resources Department. Employees who fail to report actual or suspected human trafficking (when there are reasonable grounds to believe it exists) may be deemed in violation of this Policy as permitted by applicable law. Employees may also report potential human trafficking violations to the U.S. State Department's Global Human Trafficking Hotline directly at 1 -

844-888-FREE (3733) or help@befree.org as well as to the Bureau of International Labor Affairs by following the instructions below.

Submissions:

The Office of Forced Labor, Child Labor and Human Trafficking is continuously collecting information and encourages submissions by national governments, international organizations, businesses and corporations, trade and workers' organizations, NGOs, academia, and the general public. We review all submissions as they are received. Submissions are welcome at any time. To submit comments on or information for the TDA report, please email GlobalKids@dol.gov; fax to 202-693-4830; or mail to ILAB, U.S. Department of Labor, c/o OCFT Research and Policy Unit, 200 Constitution Ave. NW, S-5315, Washington, DC 2021

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