

GLA's Anti-Slavery and Anti-Human Trafficking Statement

I. Introduction & Background

The Global Liberty Alliance (GLA) is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor, and all other trafficking-related activities (collectively, "human trafficking").

Regrettably, human trafficking remains a global problem. It remains one of the leading forms of transnational crime. The GLA is committed to complying with all labor and employment laws, rules and regulations and working to mitigate the risk of human trafficking in our business and supply chains. The GLA has adopted these policies and procedures.

As detailed by the U.S. Department of State, "Trafficking in persons," "human trafficking," and "modern slavery" are umbrella terms to refer to both sex trafficking and compelled labor. The *Trafficking Victims Protection Act of 2000* (Pub. L. 106-386), as amended ("TVPA"), and the *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime* ("the Palermo Protocol") describe this compelled service using several terms, including involuntary servitude, slavery or practices similar to slavery, debt bondage, and forced labor.

Human trafficking can include, but does not require, movement. People may be considered trafficking victims regardless of whether they were born into a state of servitude, were exploited in their home town, were transported to the exploitative situation, consented to work for a trafficker, or participated in a crime because of being trafficked. At the heart of this phenomenon is the traffickers' aim to exploit and enslave their victims and the myriad of coercive and deceptive practices they use to do so.

GLA sets and reinforces a culture of ethical behavior and compliance. GLA's Code of Business Conduct and Ethics ("the Code") alerts GLA employees and affiliates to areas of ethical risk, and guides recognizing and handling issues, including suspected human-rights violations, properly.

II. GLA's Policies and Procedures

GLA is committed to enforcing anti-human trafficking and anti-slavery practices worldwide. GLA will only engage with vendors, suppliers, consultants, subcontractors, grantees, and clients who certify a commitment to the health and safety of their workers and operate in compliance with labor laws and regulations.

All contracts issued to third-party suppliers, vendors, consultants, and grantees ("contractors") must comply with GLA's core values as described in the GLA Business Conduct & Code of Ethics. The Code contains information for GLA's employees and contractors on upholding the integrity of GLA's work and reiterates GLA's zero tolerance for modern-day slavery and human trafficking.

All GLA team members are expected to review and understand the GLA Business Conduct & Code of Ethics and all employees and contractors must sign an agreement stating that they will adhere to the GLA Business Conduct & Code of Ethics. To report unethical behavior, or suspected breaches of GLA policies, employees may contact their supervisor, manager, or Chief of Party/GLA Team Leader.

GLA has a strict non-retaliation policy. GLA will not discharge, demote, suspend, threaten, harass, or discriminate against any person in terms of employment based upon any lawful actions that person may take in making a good-faith report of ethics or compliance concerns.

GLA Anti-Human Trafficking & Modern Slavery Statement

Besides the standards in the Code and internal implementing policies, GLA promotes and supports the freedom of each employee to terminate his or her own employment, and the freedom of movement of its employees. GLA prohibits threats of violence, harassment, and intimidation, and involuntary servitude, including debt bondage and bonded labor. GLA does not engage in disciplinary measures which include an obligation to work or compulsory overtime, and rejects the use of worker-paid recruitment fees.

III. Due Diligence

Because GLA complies with restrictions from various governments, GLA exercises due diligence on all aspects of its work. GLA considers the nature and the business practices

of every party it engages with to ensure that vulnerable workers are not being trafficked or enslaved in filling positions of low or unskilled labor along the supply chain. GLA always promptly investigates and responds to any allegations or reports of potential violations of human rights.

IV. Assessing and Managing Risk

Supervisors and managers must lead by example, to establish the expectations for behavior within the GLA, and regularly speak with staff about the importance of ethics to maintain a work environment not only knowledgeable about assessing and managing risks, but also conducive to openness in reporting potential violations.

GLA ensures that all employees are trained and meet the ethical standards laid out in the Code. GLA monitors risks of supply-chain slavery and human trafficking issues. All members of the GLA can propose changes needed in policy and practice to better assess and manage risk.

V. Effectiveness of Policies and Procedures

GLA's primary governing body is the Board of Directors, which oversees GLA's Global Ethics and Compliance Program and ensures the program is appropriate and effective. Most members of the Board are external to GLA, which allows the Board to have an independent and objective perspective on issues. This ensures that performance incentives, such as utilizing the lowest cost products or vendors, create no increased risk of slavery or human trafficking.

VI. Available Training

GLA requires employees to attend an annual ethics training and provide a written certification he or she has reviewed, understands, and agrees to comply with GLA's Code of Business Conduct and Ethics.

In addition, GLA is trying to comply with various U.S. federal and other laws by developing awareness training on modern-day slavery and human trafficking.

GLA Team Members may report any violations of or activities inconsistent with GLA's policies and compliance procedures as detailed in the GLA Code of Business Conduct and Ethics. The GLA Board of Directors has approved this Statement and delegated

authority to sign it on their behalf to Mr. Jason Poblete, one of the GLA's Founding members currently serving as the GLA's Counsel & Global Governance Advisor.



Jason I. Poblete

11/19/2018

Date