SIMONA Boltaron Anti-Human Trafficking Policy

SIMONA Boltaron condemns all forms of human trafficking and the commercial sexual exploitation of children. The Company supports every person’s right to safety and security, especially children, who are most vulnerable. The protection of children from sexual exploitation is a moral imperative, and socially responsible policies and practices must reflect this principle. SIMONA Boltaron will strictly comply with all applicable laws and regulations regarding the prevention of human trafficking and the commercial sexual exploitation of children and will cooperate with law enforcement authorities to address any such instances of exploitation the Company becomes aware of in the course of its business.

In furtherance of this policy, no employee may:

• Use or allow the use of any of the Company’s facilities, resources or equipment (including the Company’s computers and networks) for the viewing, storage, distribution, promotion or other use of materials in which children are depicted as engaging in any sexual act or are otherwise made an object for prurient interests;

• Enter into, on behalf of the Company, or otherwise, any business relationships or any other arrangement with any organization that the employee has reason to believe participates in any way in human trafficking and the commercial sexual exploitation of children; or

• Use or allow the use of images or concepts that sexually exploit children.

All employees must be vigilant and immediately report to Human Resources or the Company President, as appropriate, all situations that come to their attention where human trafficking and the commercial sexual exploitation of children is suspected or appears to be intended. Under no circumstances may Company funds, property (including electronic devices and the Company’s supported technology) or personnel be used to further or support activities that participate in human trafficking and/or child exploitation.

Lastly, SIMONA Boltaron does not recruit child labor and supports the elimination of exploitative child labor. The Company will cooperate with law enforcement authorities to address any such instances of exploitation of which the Company becomes aware.

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