

## Anti-Slavery and Human Trafficking Policy

### Introduction

Golden West Companies (the “Company”) and the United States Government prohibit trafficking in persons. The U.S. Government’s policy prohibiting trafficking in persons is available at 48 CFR § 52.222-50 and is summarized below under the heading: “Summary of U.S. Government Policy of Prohibiting Trafficking in Persons.”

Golden West is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. The Company will not tolerate or condone human trafficking or slavery in any part of our organization, or in the organizations with whom the Company does business.

We have a responsibility both as a business and as individuals to tackle any form of Modern Slavery. We will not tolerate, facilitate or condone any form of Modern Slavery across our business or throughout our supply chains. This is supported through the communication to, and compliance of, our employees, suppliers and third-party providers with the Golden West Companies Anti-Slavery and Human Trafficking Policy.

Golden West employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom Golden West conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

### Purpose and Scope

The purpose of this policy is to communicate and establish controls to ensure compliance with all Anti-Slavery and Human Trafficking regulations as well as ensuring alignment to the organization’s ethical standards and Code of Conduct.

The policy covers all Company employees, officers, temporary employees, independent contractors, suppliers and third-party providers and is intended to ensure all are aware of the responsibilities they hold.

Every employee is responsible for reading, understanding and complying with this policy. Golden West managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them. If you have any questions or concerns relating to this policy, consult your manager or the human resources department.

### Our Policy

Golden West’s policy does not allow for any form of slavery or human trafficking and we will take proactive steps to ensure that Modern Slavery is not taking place in any part of our business or supply chains.

We will not engage with organizations which facilitate any form of slavery including the use of child labor or forced labor, or which do not recognize freedom of association or collective bargaining.

We require that the suppliers and third-parties we work with should hold their own suppliers and third-parties to the same standards.

We seek to continually improve awareness of the practices necessary to combat slavery and human trafficking and assess the risk profile of our business in these areas.

Our zero-tolerance approach to Modern Slavery includes our commitment that:

- we will not allow any form of slavery or human trafficking to take place in any part of our business;
- we will not use child labor, nor will we use forced labor;
- we will comply with all relevant laws, statutes and regulations relating to modern slavery;
- we will publish Modern Slavery Statements in accordance with the relevant legislation;
- we require our suppliers and third-party providers to comply with the above; and to hold their own suppliers and third-parties to the same standards;
- we will seek to educate and raise awareness across our business in the identification and reporting of Modern Slavery

## Compliance

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working within it.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, business partners and suppliers. We expect the highest standards of compliance to be upheld at all times.

We have a robust governance structure in place and take a risk-based approach to our contracting processes which are then kept under review.

We request individual company assessments and declarations where appropriate to do so and have introduced standard wording into our contracts that requires a supplier to represent, warrant and undertake that neither it nor any other person in its supply chain uses trafficked, bonded, child or forced labor or has attempted to use trafficked, bonded, child or forced labor within its supply chain. We retain the right to audit our supplier's activities and where practical, relationships, both routinely and at times of any reasonable suspicion.

If we find that other individuals or organizations working on our behalf have breached this policy, we will ensure that we take appropriate action.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

If a supplier or third-party provider is found to be in breach of this policy we may terminate our relationship and any contract or purchasing agreement in place.

## Reporting Modern Slavery

Employees, suppliers and third-party providers must not engage in, facilitate or fail to report any

activity that might lead to, or suggest, a breach of this policy.

If you are a Company employee you must report any incidence or suspicion of Modern Slavery and/or human trafficking in any part of our business or supply chain to your Manager, to Human Resources, or the Head of Company Compliance and Ethics. If you are a supplier or third-party provider to Golden West Companies you should report any suspicion to your primary account manager or business contact within the Company.

Alternatively, you may contact the California State Attorney General's Whistleblower Hotline at (800) 952-5225. The Attorney General will refer your call to the appropriate government authority for review and possible investigation.

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

Any violation of this policy may be grounds for disciplinary action, up to and including termination of employment or contracts.

All Company employees must comply with this policy.

All suppliers and third-party providers must comply with this policy.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

The policy is available on the Company website [www.goldenwest.bio](http://www.goldenwest.bio) and will be reviewed on an annual basis or as required in accordance with any updates to relevant legislation.

## Summary of U.S. Government Policy of Prohibiting Trafficking in Persons

U.S. Government policy prohibits trafficking in persons and slavery. Government contractors and their employees, subcontractors, subcontractor employees, and agents must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, basic information; or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing, and associated costs (if provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants recruitment fees.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.