



Combating Trafficking in Persons Policy

Kalitta Air, LLC is highly opposed to human trafficking and forced labor in any form. We are committed to working to mitigate the risk of human trafficking and forced labor in all aspects of our business. The US Government policy regarding any Government employees, contractor personnel and their agents engaging in any severe form of trafficking in persons, to include sex trafficking or the recruitment, harboring, transportation, provision or obtaining of a person for labor or services through the use of force, fraud, or coercion. Kalitta Air's employees and our agents are required to comply with the provisions contained in the Federal Acquisition Regulations (FAR). Pursuant to the FAR, our employees and agents directly engaged in the performance of work on a government contract who have "other than a minimal impact or involvement in contract performance" are prohibited from:

- Engaging in severe forms (i.e., using force, fraud or coercion) of trafficking in persons during the period of performance of the contract;
- Procuring commercial sex acts during the period of performance of the contract (regardless of whether the act is legal or illegal in the jurisdiction where it is procured and regardless of whether the conduct occurs during or outside working hours);
- Using forced labor in the performance of the contract;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents;
- Using misleading or fraudulent recruiting practices;
- Charging employees recruitment fees;
- Failing to pay return transportation costs for certain employees who have finished employment outside that employee's nation of residence;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required, failing to provide an employment contract, recruitment agreement or similar work document in writing in the employee's native language and prior to the employee departing from his or her country of origin.

Any violations of the above FAR, and/or this policy could result in disciplinary action which may include but are not limited to, an employee's removal from the contract, reduction in benefits or termination of employment.

Roles and Responsibilities:

Employees are responsible for reading, understanding and complying with this policy.

Employees should consult their Supervisor if they are uncertain whether a specific action would be in violation of the FAR, the Executive Order and/or this policy.

To the extent the FAR, the Executive Order and this policy differ in their requirements, the stricter requirements must be followed.

Employees may report, without fear of retaliation, any activity that violates the FAR, the Executive Order or this policy to the Kalitta Air Confidential Reporting Program or Kalitta Air Safety hotline at 1-734-544-7022

A handwritten signature in blue ink, appearing to read "D.C. Sanderlin".

D.C. Sanderlin
General Manager

A handwritten signature in blue ink, appearing to read "Heath Nicholl".

Heath Nicholl
Director of Safety