Anti-Human Trafficking Policy

2ingenio · 2io Ingeniería Avanzada S.L.

2ingenio, the trading name of 2io Ingeniería Avanzada S.L., rejects human trafficking and forced labor in all their forms.

For contracts subject to FAR 52.222-50, Combating Trafficking in Persons, we apply its requirements to our personnel, agents, and supply chain in accordance with the relevant contractual obligations.

Prohibited Conduct

- Engaging in human trafficking or using forced labor.
- Procuring commercial sex acts during contract performance.
- Destroying, concealing, confiscating, or otherwise denying access to identity or immigration documents.
- Using misleading or fraudulent recruitment practices or job offers.
- Charging workers or job applicants recruitment fees or costs, directly or indirectly.
- Using recruiters who fail to comply with applicable labor laws.
- Providing or arranging housing that does not meet local housing and safety standards.
- Failing to provide or pay for return transportation when required under the clause.
- Failing to provide employment documents required by law or contract, in writing and in a language the worker understands. Where the work requires relocation, these documents will be provided at least five days in advance.

How We Implement This Policy

We inform our personnel and agents about prohibited conduct, reporting channels, and the consequences of violations.

We verify recruitment practices and compliance with applicable wage requirements.

We communicate contractual requirements to our suppliers and subcontractors and carry out checks proportionate to risk, including at lower tiers of the supply chain.

We investigate reports received, protect potential victims and witnesses, and take appropriate corrective and reporting measures. Violations may result in disciplinary action, including dismissal in accordance with applicable law, and termination of contracts with agents or suppliers.

How to Report a Concern

Anyone may report a suspicion without fear of retaliation. Conclusive evidence is not required to raise a concern.

- Reporting channel: cumplimiento@2ingenio.com
- Independent alternative channel: canal.alternativo@2ingenio.com
- External contact specified in the FAR: Global Human Trafficking Hotline, 1-844-888-FREE (1-844-888-3733), help@befree.org. Telephone access from Spain may be limited; email contact is also available.
- In case of immediate danger in Spain: 112.

Retaliation against anyone who raises concerns in good faith or cooperates with an investigation will not be tolerated.

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