

POLICY & PROCEDURES

SFE-POL-0020 Human Trafficking

I. Policy Goal Purpose

The purpose of the Safana Faleh Alhuzali Transport & Storage Company (here after referred to as SAFCO Energy Company) Human Trafficking Policy is to prevent, protect, and prosecute human trafficking by providing frameworks for identifying victims, offering support services to survivors, holding traffickers accountable through the legal system, and raising public awareness to reduce demand and foster preventative actions.

II. Policy

At SAFCO Energy respecting human rights is embedded in everything we do. Our core values – safety, integrity, humility, growth, customer focused guide every aspect of our operations.

These values are reflected in our approach to human rights and integrated into our policies, practices, and expectations.

Our commitment to respect human rights is at the core of everything we do.

Condemnation of Human Trafficking

SAFCO Energy explicitly states its commitment to not using forced or compulsory labor and forbids child labor in its operations and supply chains. PCI DSS compliance requirements must have their status reviewed on an annual basis.

Integration with Corporate Policies

SAFCO Energy's approach to human rights, including combating trafficking, is embedded in everything we do and is supported by on labor in the workplace.

Supply Chain Due Diligence

A key component is its risk-based due diligence process, which screens suppliers for compliance with human trafficking laws and expects suppliers to adhere to similar principles

Risk Assessment and Monitoring

SAFCO Energy identifies higher-risk supplies and locations to conduct more in-depth assessments of their policies and risk management practices.

Employee Training

Employees, particularly those in procurement, receive training to improve their understanding of human rights issues and potential risks, including those related to human trafficking

Reporting Mechanisms

Employees are encouraged to report concerns and suspected violations through internal processes, such as our “Open Door” communication process.

Support for Global Principles

SAFCO Energy aligns its practices with globally recognized human rights principles, such as those from

ISO 37200 – Managing the Risk of Modern Slavery and the International Labor organization (ILO) that support the elimination of forced labor and discrimination.

Contractual Clauses

SAFCO Energy incorporates anti-trafficking clauses into our supplier contracts and expect our contractors and suppliers to meet our human rights expectations.

III. References

ISO 37200 – Managing the Risk of Modern Slavery: Currently under development as ISO/AWI 37200 and previously influenced by the British Standard BS 25700, this document is expected to be launched as an international standard in 2026. It will offer a framework for managing the risks of modern slavery, focusing on:

- **A holistic approach:** Emphasizing that people are at the center of an organization, it offers a comprehensive method for addressing human trafficking, forced labor, and modern slavery (HTFLMS)
- **Effective risk management:** It provides guidance on effectively managing the risks associated with HTFLMS
- **Governance and reporting:** It outlines principles for oversight, accountability, and preparing statements for reporting purposes

IV. Benefits for SAFCO Energy

By following the guidance in ISO 37200, SAFCO Energy can:

- **Demonstrate ethical commitment:** Show we our dedication to Environmental, Social, and Governance (ESG)
- **Improve reputation:** Enhance our business reputation and increase customer loyalty
- **Protect workers:** Safeguard the physical and mental health of our workers and their ability to earn a living
- **Ensure ethical supply chains:** Develop more stable and responsive supply chains by requiring ethical practices from suppliers

V. Enforcement

Personnel found to have violated this policy may be subject to disciplinary action, up to and including termination of employment, and related civil or criminal penalties.

Any vendor, consultant, or contractor found to have violated this policy may be subject to sanctions up to and including removal of access rights, termination of contract(s), and related civil or criminal penalties.



“Working Together leads to Winning Together”

Savanna F. Alhuzali

Founder & CEO

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