

Labor and Human Rights Policy

Fair, lawful, safe, and respectful treatment across company operations and the supply chain

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Policy owner	Owner	Review cycle	Annual

1. Purpose and Commitment

Strong Campus LLC respects internationally recognized human rights and lawful labor rights. The company conducts its professional-services operations with dignity, fairness, safety, transparency, and accountability. These expectations apply proportionately to the owner, future employees, temporary personnel, agents, recruiters, suppliers, and subcontractors.

The owner provides executive oversight for the Strong Campus Labor and Human Rights Management System, approves controls, reviews risks and incidents, directs corrective action, and maintains supporting records.

2. Scope and Governing Requirements

This policy applies to recruiting, hiring, classification, compensation, working time, workplace conduct, health and safety, information handling, purchasing, subcontracting, and contract performance. Strong Campus follows applicable federal, state, local, contractual, and client requirements. When requirements differ, the company applies the controlling lawful requirement and documents the decision.

3. Equal Opportunity and Respectful Work

- Provide equal opportunity in recruitment, selection, assignment, compensation, development, promotion, discipline, and separation.
- Prohibit unlawful discrimination based on race, color, religion, sex, pregnancy, sexual orientation, gender identity, national origin, age, disability, genetic information, veteran status, or any other status protected by applicable law.
- Provide reasonable accommodation where required and evaluate requests through an individualized, interactive process.
- Prohibit harassment, sexual harassment, intimidation, coercion, manipulation, threats, bullying, and abusive behavior.
- Protect individuals who raise concerns, request accommodation, participate in investigations, or exercise lawful workplace rights from retaliation.

4. Freedom of Association and Worker Voice

Workers may lawfully organize, join or refrain from joining worker organizations, bargain collectively where applicable, discuss working conditions, and engage in protected concerted activity. Strong Campus will not interfere with, intimidate, or retaliate against a person for exercising these rights.

5. Fair Work, Wages, and Working Time

- Classify workers accurately and provide a written agreement describing role, status, compensation, expected hours, location, benefits if any, key conditions, and applicable policies in language the worker understands.
- Pay all legally required wages, overtime, reimbursements, and benefits on time and maintain accurate time and pay records.
- Plan workload and working time to support health, rest, contract performance, and applicable wage-and-hour requirements.
- Review labor practices at least annually and when workforce structure, location, or contract requirements materially change.
- Use recruiters and staffing providers only after documented due diligence and prohibit worker-paid recruitment fees unless expressly lawful and approved in writing after review.

6. Forced Labor, Child Labor, Trafficking, and Modern Slavery

- Prohibit forced, bonded, indentured, involuntary, prison, or trafficked labor and all severe forms of trafficking in persons.
- Prohibit procuring commercial sex acts during federal contract performance and prohibit conduct barred by FAR 52.222-50 when applicable.
- Prohibit confiscating, destroying, concealing, or denying access to identity or immigration documents.
- Prohibit misleading recruitment, coercive fees, debt bondage, restriction of movement, threats, and retaliation.
- Prohibit unlawful child labor. Verify age when legally required and do not assign minors to hazardous or prohibited work.

7. Work Authorization and Responsible Recruitment

Before an employee begins work, Strong Campus will complete identity and employment-authorization verification using the current Form I-9 process and lawful timing requirements. Verification will be applied consistently without document abuse or citizenship-status discrimination. Independent contractors and suppliers will provide appropriate tax, identity, business, licensing, and authorization representations based on their status and work location.

8. Health, Safety, and Well-Being

Strong Campus maintains proportionate health and safety controls for home-office, remote, travel, client-site, and project activities. Risks are assessed before new or materially changed work and reviewed annually. Personnel may stop work and promptly report an imminent safety, security, labor, or human-rights concern without retaliation.

9. Supply-Chain Expectations

- Screen covered suppliers and subcontractors for labor and human-rights risk before approval.
- Provide this policy or the Supplier Labor and Human Rights Certification and require written acknowledgment before covered work.

- Flow down applicable contract clauses, including trafficking requirements, to the extent required.
- Require prompt disclosure of suspected violations, cooperation with review, and timely corrective action.
- Suspend, restrict, or terminate relationships when serious violations remain unresolved or immediate protection is required.

10. Reporting, Confidentiality, and Non-Retaliation

Concerns may be reported directly to the Owner by business email, telephone, written statement, or confidential meeting. Reports may be made anonymously when practical. Information will be limited to persons with a legitimate need to know, subject to legal, contractual, safety, and investigative obligations. Retaliation is prohibited.

External reporting: Nothing in this policy prevents any person from contacting law enforcement, an inspector general, the EEOC, Department of Labor, National Labor Relations Board, contracting officer, client reporting channel, or another authorized government body.

11. Due Diligence, Investigation, and Remedy

- Identify labor and human-rights risks during hiring, project planning, supplier review, and annual management review.
- Triage allegations promptly, preserve records, protect affected persons, and use an impartial fact-finding process.
- Escalate credible trafficking or other mandatory-reporting matters to required authorities and contracting officials.
- Document findings, root causes, corrective actions, responsible owners, due dates, and closure verification.
- Prioritize stopping harm and providing lawful remedy, which may include corrected pay, restored opportunity, accommodation, reassignment, supplier remediation, discipline, termination, or referral.

12. Training, Monitoring, and Records

- Complete labor, human-rights, equal-opportunity, anti-harassment, trafficking, reporting, and non-retaliation training at onboarding and annually.
- Require covered suppliers and subcontractors to complete orientation or certify equivalent training before work.
- Maintain training, hiring, work-authorization, worker-agreement, supplier-review, grievance, investigation, corrective-action, and annual-review records.
- Review the management system annually for effectiveness and update it as the company grows.

13. References

- FAR 52.222-50, Combating Trafficking in Persons: <https://www.acquisition.gov/far/52.222-50>
- U.S. Equal Employment Opportunity Commission, Employer Guidance: <https://www.eeoc.gov/employers>
- U.S. Department of Labor, Fair Labor Standards Act: <https://www.dol.gov/agencies/whd/flsa>
- USCIS, Form I-9 and Employment Eligibility Verification: <https://www.uscis.gov/i-9>

- U.S. Department of Labor, Whistleblower Protections: <https://www.dol.gov/general/topics/whistleblower>

Approval and Adoption

Approved by	Crystal R. Shaw, Owner
Effective date	September 1, 2026
Next review	September 1, 2027, or earlier if operations materially change