



Corporate Policy No. 714

Title: *Combating Trafficking in Persons Policy*

Revision No.: 1

Effective Date: January 1, 2017

This Policy contains the following sections:

- 1.0 Purpose
- 2.0 Policy
- 3.0 Scope
- 4.0 Roles and Responsibilities/Authorities
- 5.0 Procedures/Instructions
- 6.0 References
- 7.0 Anti-Trafficking Compliance Plan`

Applicability: See the “[Applicability Statement](#)” of the Corporate Policy Manual

1.0 Purpose

- 1.1 L3 technologies, Inc. (L3) is implementing this Combating Trafficking In Persons Policy (Policy) to establish guidelines for complying with the anti-trafficking requirements in Federal Acquisition Regulation (FAR) Subpart 22.17, FAR 52.222-50, FAR 52.222-56, DoD FAR Supplement (DFARS) and DFARS Procedures, Guidance, and Information (PGI) 222.17, DFARS 252.203-7004(c)-(e), DFARS 252.222-7007, and DFARS 252.225-7040(d)(8).
- 1.2 The Policy implements the above regulations as well as Executive Order 13627, “Strengthening Protections Against Trafficking in Persons in Federal Contracts,” and title XVII of the National Defense Authorization Act (NDAA) for Fiscal Year 2013, entitled “Ending Trafficking in Government Contracting,” by establishing standards of conduct and notifying all L3 employees and agents of the Company’s strict policy of prohibiting: severe forms of trafficking in persons; the procurement of commercial sex acts; the use of forced labor; and the use of misleading or fraudulent recruiting or housing practices.

2.0 Policy

- 2.1 Government Policy. The U.S. Government has adopted a “zero tolerance” policy prohibiting human trafficking in Federal contracting. As a result, Government solicitations and contracts prohibit contractors, subcontractors and their respective employees and agents from engaging in or supporting severe forms of trafficking in persons, procuring commercial sex acts, using forced labor and using misleading or fraudulent recruitment/housing practices.
- 2.2 The Company’s Policy. It is the policy of L3 to comply with all applicable U.S. laws and regulations relating to trafficking in persons. In accordance with the terms and limitations specified in FAR Subpart 22.17, FAR 52.222-50, FAR 52.222-56 and associated DFARS provisions, the Company, its subcontractors, and each of their respective employees and agents are strictly prohibited from engaging in any of the following practices:
- 2.2.1 Severe forms of trafficking such as: (1) sex trafficking, in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (2) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery;
 - 2.2.2 Procuring a commercial sex act to include any sex act on account of which anything of value is given to or received by any person;
 - 2.2.3 Use of forced labor including knowingly providing or obtaining the labor or services of a person: (1) by threats of serious harm to, or physical restraint against, that person or another person; (2) by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or (3) by means of the abuse or threatened abuse of law or the legal process;
 - 2.2.4 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;
 - 2.2.5 Using misleading or fraudulent practices to recruit employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, 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 or arranged by employer or agent), any significant costs to be charged to the employees, and, if applicable, the hazardous nature of the work;
 - 2.2.6 Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
 - 2.2.7 Charging employees recruitment fees;
 - 2.2.8 Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract, for portions of contracts and subcontracts performed outside the U.S.; or for an employee who is not a U.S. national and who was brought into the U.S. to work on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant

to a written agreement with the employee for portions of the contracts and subcontracts performed outside the U.S. This does not apply to any employee who is (a) legally permitted to remain in the country of employment and who chooses to do so; or (b) is exempted from the requirement to provide return transportation or pay for the cost of return transportation by an authorized official of the agency.

2.2.9 Providing or arranging housing that fails to meet host country housing or safety standards;

2.2.10 If required by law or contract, failing to provide a written employment contract, recruiting agreement or other required work document, in a language understood by the employee. If the employee is relocating to the work location, such written document shall be provided to the employee at least five (5) days prior to the relocation. Such document shall provide sufficient details regarding the employee's wages, prohibitions on charging recruitment fees, benefits, work location, housing, time off, roundtrip transportation, grievance procedures and a summary of the anti-trafficking prohibitions.

2.3 The Company, its employees, agents, subcontractors, subcontractor employees and agents face the potential for severe consequences in the event they engage in the activities proscribed in paragraph 2.2 above. Potential consequences include removal of the employee(s) or agent(s) from the contract, termination for default of the prime contract and/or affected subcontracts, suspension of contract payments, loss of award fee, negative entry into the Federal Awardee Performance and Integrity Information System (FAPIIS), non-exercise of an option period, or suspension or debarment, in addition to any other remedies available to the Government under applicable law.

3.0 Scope

3.1 This Policy applies to all L3 employees, agents, divisions, functional areas, and managed affiliates that perform U.S. Government contracts. The provisions of this Policy are applicable to all employees and agents directly engaged in the performance of work under any U.S. Government contract, as well as any other employee or agent who has other than a minimal affect on or involvement in performance of such a contract.

3.2 The Company shall flow down the clause at FAR 52.222-50 to all subcontractors (including commercial item subcontractors); however the requirements for a compliance plan and certification in FAR 52.222-50(h) shall only apply to subcontractors providing supplies acquired outside of the United States or services to be performed outside the United States and that have an estimated value in excess of \$500,000. The requirements in Paragraph 5.1.2.2 below only apply to contracts containing DFARS 252.225-7040, Contractor Personnel Supporting the U.S. Armed Forces Deployed outside the United States.

4.0 Roles and Responsibilities/Authorities

4.1 Employees and Agents shall comply with all aspects of this Policy.

- 4.2 Program Managers shall:
 - 4.2.1 Coordinate with Human Resources to ensure that all employees and agents performing U.S. Government contracts are notified of the Government's zero-tolerance policy and the requirements of this Policy.
 - 4.2.2 Immediately report any potential violations of this Policy to the Company Legal Department so that the Company is able to promptly report such matter to the appropriate Government officials.
- 4.3 Contracts Managers shall:
 - 4.3.1 Coordinate with the Company Legal Department to ensure that the Company promptly notifies the applicable contracting officer and agency Inspector General upon receiving information alleging that a Company employee, subcontractor or agent has potentially violated this Policy, along with notification of any corrective actions taken.
 - 4.3.2 Coordinate with the Company Legal Department to ensure full cooperation with any Federal agency conducting an audit or investigation of potential Anti-Trafficking violations.
 - 4.3.3 Coordinate with the Company Legal Department to ensure that if the government posts a negative entry regarding trafficking into FAPIIS, that comments responding to that posting are considered and posted.
- 4.4 Subcontracts/Procurement Managers shall:
 - 4.4.1 Ensure that FAR 52.222-50, FAR 52.244-6 (for commercial items), DFARS 252.203-7004, DFARS 252.222-7007 and DFARS 252.225-7040(d)(8) are flowed down to all covered subcontractors that perform supplies or services for the Company in support of a U.S. Government contract where such clauses are required.
 - 4.4.2 Ensure that appropriate due diligence is conducted of subcontractors to ensure compliance with the applicable FAR/DFARS clauses and the requirements of this Policy.
 - 4.4.3 Coordinate with Division Contracts and the Company Legal Department promptly to ensure timely notifications to the applicable contracting officer and Agency Inspector General, as well as providing timely support to any Federal agency conducting an audit or investigation of potential subcontractor Anti-Trafficking violations.
- 4.5 The Legal Department is responsible for interpreting this Policy and providing advice and guidance to the Company divisions and their employees and agents regarding this Policy's requirements and shall:
 - 4.5.1 Review subcontractors' anti-trafficking policies and compliance plans to ensure appropriate safeguards are in place.
 - 4.5.2 Coordinate with the Company contracts managers on all notifications to the Government required by this Policy.
 - 4.5.3 Ensure full cooperation with any Federal agency conducting an audit or investigation of potential Anti-Trafficking violations.
 - 4.5.4 Coordinate with Contracts Managers to ensure that if the government posts a negative entry regarding trafficking into FAPIIS, that comments responding to that posting are considered and implemented

- 4.6 The HR Department shall:
- 4.6.1 For each covered contract, develop an overseas assignment agreement, recruiting plan and associated procedures to ensure compliance with the requirements in Paragraphs [2.2.5 – 2.2.10](#) of this Policy.
 - 4.6.2 Modify, where necessary, the Compliance Plan, located in [Section 7.0](#) of this Policy, according to the nature and scope of contract activities, any host-country standards for wages, housing, recruitment practices, and any other applicable anti-trafficking guidelines.
 - 4.6.3 Work with the program manager to ensure that the posting requirements of FAR 52.222-50(h)(4), DFARS 252.203-7004 and DFARS 252.225-7004(d)(8) are satisfied.
 - 4.6.4 Ensure that this Policy and the [Anti-Trafficking Compliance Plan](#) are provided, as necessary, to new and existing employees and agents who undertake an overseas assignment implemented.

5.0 Procedures/Instructions

5.1 Awareness Program/Notification to Employees and Agents

- 5.1.1 Each L3 division or business area responsible for performing a U.S. Government contract shall notify all employees, subcontractors, and agents performing such contracts about (a) the Company's (and the Government's) policy of ensuring that contractor and subcontractor employees and agents do not engage in any of the prohibited activities as set forth in Paragraph 2.2 of this Policy; and (b) the disciplinary actions that can be taken against the Company for violations of FAR 52.222-50 and actions that that may be taken against any Company employee, subcontractor, or agent who violates the provisions of this Policy.
- 5.1.2 Posting Requirements. The Company's Human Resources Department shall work with the program teams, as necessary, to ensure that the following posting requirements are satisfied:
 - 5.1.2.1 DFARS 252.203-7004(c) – The Company shall prominently display the DoD Combating Trafficking in Persons and Whistleblower Protection hotline posters in the Company's common work areas within those divisions performing DoD contracts. The posters may be obtained from the DoD Hotline or at <http://www.dodig.mil/hotline/posters.cfm>. An electronic version of these posters shall also be displayed on the Company's web-site.
 - 5.1.2.2 DFARS 252.225-7040(d)(8)(ii) – The Company shall post an Employee Bill of Rights to ensure that all employees supporting the U.S. Armed Forces deployed outside the United States are aware of their rights as set forth in as set forth in DFARS 252.225-7040(d)(8)(i). This posting shall be in English and in any foreign language(s) spoken by a significant portion of the workforce.
 - 5.1.2.3 Compliance Plan – The Company shall post an electronic version of the Anti-Trafficking Compliance Plan on the Company's web-site, in addition to at or near the site as required by Paragraph [5.1.2.1](#) above.

5.2 Compliance Plan

In accordance with FAR 52.222-50(h), L3 has developed an Anti-Trafficking Compliance Plan ([Section 7.0](#) of this Policy) to be implemented on each contract subject to this Policy. This Compliance Plan shall be tailored as appropriate for each contract, and must include, at a minimum: (1) an awareness program to inform employees about the Government's anti-

trafficking policy and the actions that will be taken against employees for violations; (2) a process for reporting potential violations without fear of retaliation; (3) a recruitment and wage plan that meets the requirements of paragraph 2.2 of this Policy; (4) a housing plan that satisfies host-country housing and safety standards; (5) a process for conducting appropriate due diligence to ensure that any subcontractors or agents used under the contract comply with the anti-trafficking requirements of this Policy; and (6) a certification to be submitted annually during performance of the contract affirming the requirements of FAR 52.222-50(h)(5).

Any Company business unit performing a contract that requires a Compliance Plan shall post such Compliance Plan at the workplace, unless the work under the contract is performed in the field or not otherwise at a fixed location, or is otherwise impractical to physically post, in which case a written copy of such Plan shall be provided to each affected employee and agent. In any event, the Company shall post the relevant elements of the Compliance Plan on the Company's web-site. The Company shall provide a copy of the Compliance Plan to the Government Contracting Officer upon request.

5.3 **Certification**

Designated Company personnel must perform adequate due diligence regarding the prohibited activities set forth in this Policy to certify compliance prior to award (FAR 52.222-56) and annually thereafter during performance of the contract as part of its Compliance Plan (FAR 52.222-50(h)(5)). The Company must certify that (a) it has implemented a Compliance Plan to prevent prohibited anti-trafficking activities, and to monitor, detect and terminate any subcontractor engaged in prohibited activities; and (b) after conducting sufficient due diligence, to the best of the Company's knowledge and belief, neither the Company nor any of its subcontractors or agents are engaged in prohibited activities (or if such prohibited activities are discovered, appropriate remedial and referral actions have been taken).

For DoD contracts requiring inclusion of DFARS 252.222-7007, the Company must represent that it will not engage in any trafficking in persons or related activities, including but not limited to the use of forced labor, in the performance of the contract. The Company must also represent that it has hiring and subcontracting policies to protect the rights of its employees and the rights of subcontractor employees and will comply with those policies in the performance of the contract. Finally, the Company must also represent that it has notified its employees and subcontractors of the responsibility to report trafficking in persons violations by the Company, its employees, or subcontractor employees, at any tier, and that employees are protected under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9 from reprisal for whistle blowing on trafficking in persons violations.

5.4 **Flow-Down Requirement**

Each L3 division or business area responsible for the performance of a U.S. Government contract shall ensure that its Subcontracts/Procurement Managers properly flow down the contract clauses at FAR 52.222-50, FAR 52.244-6, DFARS 252.203-7004, DFARS 222.7007, DFARS 252.225-7040, as necessary to all covered subcontractors providing supplies or services in support of a U.S. Government contract

5.5 **Notifications to the Government**

5.5.1 The Company's Legal Department will coordinate with the contracts manager to promptly notify the applicable contracting officer and agency Inspector General with sufficient details of any credible information that any Company employee or agent has

violated this Policy or that any subcontractor employee or agent has committed any of the trafficking in persons acts prohibited by law and regulation.

- 5.5.2 As required by FAR Subpart 22.17 and FAR 52.222-50, the responsible Company contracts manager or program manager will notify the Company's Legal Department immediately upon receiving any information alleging that an employee or agent has violated this Policy, or that a subcontractor employee or agent has committed any of the acts prohibited by paragraph 2.2.
- 5.5.3 At all times during a Government investigation, the Company shall provide timely and complete responses to Government auditors' and investigators' requests for documents, and provide reasonable access to facilities and staff. Any such requests and the Company responses shall be coordinated with the appropriate member of the Company's Legal Department.
- 5.5.4 The Company shall cooperate fully in providing reasonable access to its facilities and staff to allow federal agencies to conduct their audits, reviews, investigations or other activities to determine the Company's compliance with the aforementioned regulations.

5.6 **Violations**

Violations of this Policy by any Company employee or agent may result in disciplinary action up to, and including, removal from the contract, suspension or debarment of the employee or agent from further Government contracting, and suspension or termination of employment. Violations of this Policy by the Company or its subcontractors may result in removal of the employees, agents, or subcontractors from the contract, negative entry into FAPIIS, non-exercise of an option period, contract termination, suspension of contract payments, loss of the Company's award fee under the contract, or suspension or debarment.

The Company must protect all employees suspected of being victims of or witnesses to prohibited activities prior to their return to their home country, as well as provide suitable remedies for violations.

6.0 **References**

The Company's [Anti-Trafficking Compliance Plan](#)
FAR Subpart 22.17 "Combating Trafficking in Persons;"
FAR Contract Clause 52.222-50;
FAR Clause 52.222-56;
FAR 52.244-6;
DFARS PGI Subpart 222.17 - Combating Trafficking in Persons;
DFARS 222.1770, 1771;
DFARS 252.203-7004;
DFARS 252.222-7007;
DFARS 252.225-7040(d)(8);
DoD Instruction 2200.01, Combating Trafficking in Persons;
10 U.S.C. 2409
22 U.S.C. 7102

7.0 Anti-Trafficking Compliance Plan

7.1 Purpose

7.1.1 In accordance with FAR 52.222-50(h), the Company has developed an Anti-Trafficking Compliance Plan (Compliance Plan or Plan) to be implemented for each contract that is for supplies, other than commercially available off-the-shelf items, acquired outside the U.S., or services to be performed outside the U.S., that exceed \$500,000 in value. The purpose of this Plan is to ensure that employees, agents, and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as the consequences that may or will result from violations of such regulations and laws. The Plan also includes terms for recruitment, wages, and housing, as well as procedures to prevent employees, agents and subcontractors at any tier from trafficking in person.

7.2 Tailoring of Plan

7.2.1 The Company will maintain a Compliance Plan that is sufficiently tailored with respect to the size and complexity of the contract under which employees will work and to the nature and scope of the activities to be performed for the Government, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

7.3 Employee's Right Under This Plan

7.3.1 The Company will provide to employees and agents, at least five days prior to any relocation, an employment contract, written in a language understandable by the employee, that will include, but is not limited to, the following information: wages and fringe benefits; location of work; living conditions; housing and associated costs, if provided or arranged; any significant costs to be charged the employee; and hazardous nature of the work, if applicable.

7.3.2 Employees have the right to ask for clarification of any employment terms they do not understand. The Company will require employees or agents to be presented with and expressly agree to the terms of their employment.

7.3.3 The Company will provide all employees and agents a copy of the Company's Combating Trafficking In Persons Policy, including this Compliance Plan (tailored as necessary), prior to the commencement of their assignment.

7.3.3.1 The Company Policy explains the Company's commitment to comply with all applicable U.S. laws and regulations relating to trafficking in persons, including prohibiting contractors, subcontractors, and their respective employees and agents from engaging in severe forms of trafficking in persons, procuring commercial sex acts, using forced labor, and using misleading or fraudulent recruitment/housing practices, while performing U.S. Government contracts.

7.3.3.2 The Company's Policy outlines prohibited conduct, actions that will result from violating the Policy, actions taken for implementation of the Policy, as well as an employee's and agent's duty to report suspected violations, and the Company's obligation to report credible information regarding suspected violations to appropriate Government officials.

7.3.3.3 The Company's Policy provides more detailed information regarding the following:

Recruitment: The Company permits only the use of recruitment companies with trained employees and requires recruiters to comply with local labor laws and to provide potential employees and agents with accurate information pertaining to their employment, including their duties, hours of work, location of work, wages, housing/living conditions, costs to be charged the employee, and any hazardous nature of the work, at least five days prior to any relocation. The Company prohibits charging employees recruitment fees.

Wages: The Company requires wages to meet applicable host-country legal requirements or explain any variance.

Housing: If housing is provided by the Company, it must meet host-country housing and safety standards.

Identity Documents: The Company strictly prohibits destroying, concealing, confiscating or otherwise denying access to employee identity or immigration documents.

Transportation Costs: The Company will provide return transportation at the end of employment for employees brought to a non-U.S. country for the purpose of working on a U.S. government contract. For trafficking victims or witnesses seeking redress in the country of employment, the Company will provide transportation costs in a manner that does not obstruct such redress or witness activity. Non U.S. nationals brought to the U.S. may also qualify for return transportation costs. An employee may refuse return transportation costs if legally able to stay in the country. The Company may opt to either provide or pay for transportation, based on the Company's established policies and procedures, as well as the modes and costs of transportation available. Employees who are terminated for cause or who desire to leave prior to completion of the contract are still entitled to these costs, if they would otherwise qualify for them.

Reporting: The Company has provided a worry-free means of reporting suspected trafficking activity. Such reporting is a critical tool to assist the Company in monitoring and detecting any trafficking violations. The Company must immediately notify appropriate Government officials of any credible information regarding suspected trafficking activity.

7.3.3.4 The Company employees and agents will be required to confirm that they have read and understood the Policy and Compliance Plan and agree to abide by its terms.

7.4 Violations

Violations of this Policy or Plan by any Company employee or agent may result in disciplinary action up to, and including, removal from the contract, suspension or debarment of the employee or agent from further Government contracting, and suspension or termination of employment. Violations of this Policy by the Company may result in removal of the employees or agents from the contract, negative entry into FAPIIS, non-exercise of an option period, contract termination, suspension of contract payments, loss of the Company's award fee under the contract, or suspension or debarment.

7.5 Reporting Violations Under This Plan

7.5.1 The Company is committed to providing a safe and worry-free means of reporting suspected trafficking activity. All the Company employees and agents are required to report, anonymously if preferred, any suspected trafficking-related activity through any of the following means:

7.5.1.1 Company Hotline Information:

Website: www.L3Code.com

By Email: ethics@L3Tcom.com

By Phone: **1-877-L3CODE-9**

7.5.1.2 Company Legal Department

7.5.1.3 Global Human Trafficking Hotline

By Email: help@befree.org

By Phone: 1-844-888-FREE

7.5.2 The Company has an obligation to protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and shall not prevent or hinder the ability of these employees from cooperating fully with Government authorities.

7.5.3 If the Company is made aware of any credible information from any source pertaining to a suspected trafficking violation, the Company will investigate such allegations, take appropriate remedial measures, and immediately notify the contracting officer and the agency Inspector General (IG) of that information, as well as what action it has taken with respect to the allegation.

7.5.4 The Company will fully cooperate with any Federal agency conducting an audit or investigation of potential anti-trafficking violations, including providing timely responses to Government investigators and providing reasonable access to facilities and staff.

7.6 Subcontractor Compliance and Monitoring

7.6.1 The Company's subcontractors must comply, where applicable, with the anti-trafficking requirements detailed in FAR Subpart 22.17, FAR 52.222-50, FAR 52.222-56, DoD FAR Supplement ("DFARS") and DFARS Procedures, Guidance, and Information ("PGI") 222.17, DFARS 252.203-7004(c)-(e); DFARS 252.222-7007, and DFARS 252.222-7040(d)(8).

7.6.2 Failure to comply with the requirements of the Company's Policy, or any anti-trafficking law or regulation will result in swift action by the Company, up to and including immediate termination of any subcontract with the Company, as well as potential suspension and debarment.

- 7.6.3 Pursuant to FAR 52.222-50(h) and (i), if a Company subcontractor is required to submit a certification, it must provide the Company with a copy of its anti-trafficking policy and compliance plan when requested, and, prior to that subcontract award, certify that it has implemented a compliance plan to prevent any prohibited activities in FAR 52.222-50. It must also certify that it will monitor, detect, and terminate any agent, subcontract or subcontractor employee engaging in prohibited activities; and, after having conducted due diligence, either (a) to the best of the subcontractor's knowledge and belief, neither it nor any of its agents, subcontractors, or their agents is engaged in any such activities; or (b) if abuses relating to any of the prohibited activities have been found, the subcontractor, or its lower-tier subcontractor, has taken the appropriate remedial and referral actions.
- 7.6.4 Subcontractors' compliance plans must meet the minimum requirements in FAR 52.222-50(h), and be sufficiently tailored with respect to the size and complexity of the contract under which employees will work, and to the nature and scope of the activities to be performed for the Government, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.
- 7.6.5 The Company will monitor subcontractors' conduct based on the risk of trafficking in persons related to the particular product or service being acquired.
- 7.6.5.1 Where the Company has access and it is determined appropriate, the Company will inspect for signs of trafficking in persons at the workplace, and if housing is provided, inspect the housing conditions.
- 7.6.5.2 Subcontractors must agree to monitor trafficking-related activities, and to inspection and audit by the Company. Any suspected activity will be investigated and reported pursuant to the Company Policy and legal requirements.
- 7.6.5.3 Where the Company subcontractors are distant, and for lower tier subcontractors, the Company will review the plans and certifications of its subcontractors to ensure they include adequate monitoring procedures. These plans must be made available upon request.
- 7.6.6 The Company's subcontractors have an obligation to protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and shall not prevent or hinder the ability of these employees from cooperating fully with Government authorities.
- 7.6.7 If a Company subcontractor is made aware of any credible information from any source pertaining to a suspected trafficking violation, that subcontractor must investigate such allegations, take appropriate remedial measures, and immediately notify the Company, the contracting officer and the agency Inspector General (IG) of that information, as well as what action it has taken with respect to the allegation.
- 7.6.8 The Company's subcontractors must fully cooperate with any Federal agency conducting an audit or investigation of potential anti-trafficking violations, including providing timely responses to Government investigators and providing reasonable access to facilities and staff.

7.7 Posting of Compliance Plan

- 7.7.1 This Compliance Plan shall be posted at the workplace, unless the work under the contract is performed in the field or not otherwise at a fixed location, or is otherwise impractical to physically post, in which case a written copy of such Plan shall be provided to each affected employee and agent.
- 7.7.2 The Company shall also post the relevant elements of the Compliance Plan on the Company's web-site.
- 7.7.3 The Company will post relevant contents of the Compliance Plan no later than the initiation of contract performance.
- 7.7.4 The Company and its subcontractors will meet any additional posting requirements pursuant to applicable FAR and DFARS anti-trafficking provisions, according to paragraph 5.1.2 of the Company's Combating Trafficking In Persons Policy.

7.8 Certification of Compliance Plan

- 7.8.1 When required by FAR 52.222-50(h)(5) or FAR 52.222-56, the Company will certify to the Government that it will maintain this Anti-Trafficking Compliance Plan and Combating Trafficking In Persons Policy; and,

The Company will further certify that it will monitor, detect and terminate any subcontractor engaged in prohibited activities; and,

The Company will further certify that, after conducting sufficient due diligence, to the best of its knowledge and belief, neither the Company nor any of its subcontractors or agents are engaged in prohibited activities; or,

If abuses are found relating to any of the prohibited activities outlined in the referenced FAR, DFARS, or the Company Policy or Plan, the Company or its subcontractor has taken the appropriate remedial actions.



Ann D. Davidson
Senior Vice President, General Counsel
and Corporate Secretary

Record of Change

<u>REVISION NUMBER</u>	<u>ISSUE DATE</u>	<u>DESCRIPTION OF CHANGE</u>
0	September 28, 2015	New policy.
1	October 12, 2015	Update of the Anti-Trafficking Compliance Plan to define tailoring of the plan.
1	January 1, 2017	Administrative change – update for Corporate name change and responsible owner.