



HJF COMBATING TRAFFICKING IN PERSONS MASTER COMPLIANCE PLAN

1. Scope

HJF, HJFMRI, and HJFMRI Ltd/Gte (hereinafter, “HJF”) has **a zero-tolerance** policy regarding trafficking in persons and is 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 U.S. Government also has a **zero-tolerance** policy regarding trafficking in persons. Government employees, contractors, and their subcontractors and agents are prohibited from, *inter alia*, engaging in any severe form of trafficking in persons, defined to mean 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 and sex trafficking.

This HJF Combating Trafficking in Persons Compliance Plan (this “Compliance Plan”) is issued pursuant to , *HJF’s Combatting Trafficking in Persons Policy* (HJF-0010), attached as Appendix A (the “HJF CTIP Policy”), and is intended to supplement and work together with *HJF’s Combatting Trafficking in Persons Standard Operating Procedure* (HJF-0010-P1) (the “HJF CTIP SOP”). This Compliance Plan applies to (1) all contracts outside the U.S. for services performed or goods acquired (other than commercially available off-the-shelf (COTS) items) with estimated values exceeding \$700,000, (2) all grants or cooperative agreements for services performed or goods acquired (other than COTS items) outside the U.S. with a value exceeding \$500,000, and (3) all other agreements that include Combating Trafficking in Persons requirements, including under any Other Transaction Authority (OTA) awards and contracts (whether performed inside or outside the U.S.) that incorporate applicable DFARS requirements described below per Department of Defense Instruction 2200.01 (Combating Trafficking in Persons). HJF is committed to operating our business in accordance with these important rules.

Questions regarding HJF’s policy and procedures to combat trafficking in persons may be directed to a member of HJF’s Ethics & Compliance Department at ethics@hjf.org. Additional awareness information about trafficking in persons may be found at the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons website at <http://www.state.gov/j/tip>.

2. Implementation

2.1 HJF personnel shall comply with the provisions contained in the Uniform Guidance, 2 CFR Part 175, the Federal Acquisition Regulation; Combatting Trafficking in Persons (the “FAR”), 52.222-50, and Defense Federal Acquisition Regulation Supplement: Further Implementation of Trafficking in Persons Policy (48 CFR Parts 203, 204, 212, 222, and 252) (the “DFARS”) as indicated by HJF’s work under federal contracts, grants and cooperative agreements and as



necessary to monitor HJF’s lower-tier vendors and their employees providing goods or performing services under subcontracts and subawards thereunder.

2.2 Consistent with applicable requirements included in HJF’s U.S. federal contracts, grants and cooperative agreements, including FAR 52.222-50 and 2 CFR Part 175, HJF shall not, and shall provide in all applicable subcontracts and subawards that its lower-tier vendors and their employees may not:

- a) Engage in “severe forms of trafficking in persons,” which generally is defined as recruiting, harboring, transporting, provisioning, or obtaining a person for labor services through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery and sex trafficking;
- b) Procure “commercial sex acts,” which are defined as “*any sex act* on account of which *anything of value* is given to or received by any person;”
- c) Use “forced labor” in the performance of a government contract. Forced labor generally includes labor that is performed involuntarily and under the menace of any penalty. It refers to situations in which persons are coerced to work using violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities; or
- d) Engage in any other act that directly support or advance trafficking in persons, including the following acts:
 - (i) Destroying, concealing, removing, confiscation, or otherwise denying an employee access to that employee’s identity or immigration documents;
 - (ii) Failing to provide return transportation or pay for return transportation costs to an employee from a country outside the United States to the country from which the employee was recruited upon the end of employment if requested by the employee, unless: (A) exempted from the requirement to provide or pay for such return transportation by HJF; or (B) the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
 - (iii) Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment;
 - (iv) Charging recruited employees, a placement or recruitment fee; or
 - (v) Providing or arranging housing that fails to meet the host country’s housing and safety standards.

2.3 HJF shall have the right to terminate any lower-tier vendors upon becoming aware that such lower-tier vendor has engaged in any activity prohibited above.



2.4 For applicable goods procured and services performed outside the U.S., HJF shall:

- a) Only utilize professional labor brokers and trained employees, not agents or subagents, during performance of any applicable contract, grant or cooperative agreement, and will comply with local labor laws of the country in which recruiting takes place.
- b) Not charge recruitment fees to any employee (and no lower-tier vendor or labor broker shall charge money to secure visas or to secure employment).
- c) Provide wages which meet applicable host country legal requirements or provide an explanation for any variance.
- d) Not use misleading or fraudulent recruitment practices, including those prohibited in Fraud in Foreign Labor Recruiting, 18 U.S.C §1351, to solicit, recruit or retain workers, including, but not limited to, misrepresentations concerning the location of the work site, the amount of compensation to be received and employee skills based on the type of work required on the contract.
- e) Provide a written employment contract, recruitment agreement or similar work paper, if required by law or contract, in the employee's native language or in a language the employee understands, at least five (5) days prior to the employee departing from his or her country of origin. Specifically, the document shall contain:
 - details about work description,
 - wages,
 - the prohibition on recruitment fees,
 - work location(s),
 - living accommodations and associated costs,
 - time off,
 - round trip transportation arrangements,
 - grievance process,
 - the content of applicable trafficking laws and
 - any applicable benefits employee is to receive.

HJF will reserve the right to terminate recruiters and labor providers and subject them to corrective actions, including barring them from future contracts, if it is determined they charged any worker a recruitment fee, or intentionally provided inaccurate information to a contract worker regarding the details of the terms and conditions of their employment, including but not limited to: wages, working hours, nature of the work, living conditions and work location(s).

2.5 In addition to the foregoing requirements, HJF shall:

- a) **Provide reasonable access to site, living quarters, employment records** to allow any Prime award sponsors, contracting agencies and other responsible enforcement agencies to conduct audits and investigations. HJF will not obstruct or influence the investigation or audit; will provide timely and complete responses to government auditors' and



investigators' and all relevant internal/external party requests, as applicable, for documents; will cooperate fully in providing reasonable access to facilities and staff and will protect suspected employee-victims.

- b) Provide, arrange, and outline a housing plan in accordance with host country housing or safety standards** or provide adequate reimbursement for living, if HJF intends to provide housing. Where there are no host country standards or where HJF determines the host country standards to be inadequate, the International Finance Corporation (IFC) worker accommodation standards will apply. A housing plan will be established to ensure ongoing compliance with host country or IFC accommodation standards.
- c) Make employee's identification documentation (i.e., passports) available if requested to hold onto documents by worker for safekeeping.**
- d) Post ethics hotline information in appropriate living, dining, and office quarters of the program site** so that employees can report any suspected violations without fear of retaliation. HJF shall also post the Global Human Trafficking Hotline information: 1-844-888-FREE and help@befree.org, along with the link to the Department of State's Office to Monitor and Combat Trafficking Persons, located at <http://www.state.gov/j/tip>
- e) Post this Compliance Plan on the HJF website [e.g., HJF plan on Supplier Resources page], at the workplace of HJF employees and subsidiary employees.** If posting at the worksite or on the website is impracticable (i.e., the work is to be performed in the field or not in a fixed location and there is no website available), this Compliance Plan may be presented to the employee in writing, with an option for the employee to request and receive additional details.
- f) Flow down the applicable policies, processes, rules/regulations to prevent its lower-tier vendors from engaging in trafficking in persons, including 2 CFR Part 175, FAR 52.222-50 or any other required flow down with respect to trafficking in persons. In addition,** HJF shall require that its applicable lower-tier vendors provide access to and allow HJF to monitor and audit compliance with this Plan and provide plans, policies, procedures, and reports to ensure compliance.
- g) Require its applicable lower-tier vendors to post ethics hotline information in appropriate living, dining, and office quarters of the program site** so that employees can report any suspected violations without fear of retaliation. If such lower-tier vendors do not have an ethics hotline number, it shall post the HJF hotline number: 1 - 8 6 6 - 6 8 7 - 2 3 2 1 ; **E- MAIL: <https://hjf.ethicspiont.com>.** Lower-tier vendors shall also post the Global Human Trafficking Hotline information: 1-844-888-FREE and



help@befree.org, along with the link to the Department of State's Office to Monitor and Combat Trafficking Persons, located at <http://www.state.gov/j/tip>.

- h) Require that its applicable lower-tier vendors report any violations of this Compliance Plan to the HJF's Ethics & Compliance Officer: ethics@hjf.org.**
- i) Immediately inform the awarding agency or sponsor under any applicable contract, grant or cooperative agreement of any information HJF receives from any source that alleges credible information that HJF, any subrecipient, contractor, or subcontractor of HJF, or any agent thereof has engaged in any conduct prohibited under this Compliance Plan. HJF shall fully cooperate with any United States Government audit, investigation, or corrective action relating to trafficking in persons.**

3. DFARS

3.1 The DFARS also contains prohibitions on trafficking in persons that originated prior to the FAR provisions discussed above. The DFARS provisions are slightly different from the FAR prohibitions with respect to (i) the contract's place of performance (the requirements may apply regardless of whether the contracts are performed within or outside of the United States); and (ii) the monetary threshold above which an affirmative representation of compliance must be made.

3.2 For solicitations and contracts with a value expected to exceed the simplified acquisition threshold (\$350,000) when DFARS applies to the contract, HJF will comply with, and ensure that its subcontractors comply with, the following requirements:

- Will not engage in trafficking in persons or related activities, including but not limited to the use of forced labor, in the performance of this contract;
- Has policies to protect the rights of its employees and the rights of subcontractor employees and will comply with those policies in the performance of this contract; and
- Has notified its employees and subcontractors of (i) the responsibility to report trafficking in persons violations by the Contractor, Contractor employees, or subcontractor employees at any tier; and (ii) employee protection under 10 U.S.C. § 2409, as implemented in DFARS subpart 203.9, from reprisal for whistleblowing on trafficking in persons violations.

3.3 For DOD contracts for a non-commercial item with a value exceeding \$5 million, HJF shall, and shall ensure that any applicable vendor, subcontractor, or labor broker shall also:

- a) Prominently display the DoD Combating Trafficking in Persons and Whistleblower Protection hotline posters in employee work spaces in English and in any foreign language(s) spoken by a significant part of the workforce (DFARS 252.203-7004)**



- b) **Provide and post an employee bill of rights in employee workspaces in English and any foreign languages** spoken by a significant portion of the workforce (DFARS 252.225-7040). Specifically, contractors must ensure that their employees are aware of their rights to:
- Hold their own identity or immigration documents, such as a passport or driver's license;
 - Receive agreed upon wages on time;
 - Take lunch and work breaks;
 - Elect to terminate employment at any time;
 - Identify grievances without fear of reprisal;
 - Have a copy of their employment contract in a language they understand;
 - Receive wages that are not below the legal in-country minimum wage;
 - Be notified of their rights, wages, and prohibited activity prior to signing their employment contract; and
 - If housing is provided, live in housing that meets host-country housing and safety standards.
- c) **Notify employees and subcontractors regarding their obligation to report human trafficking violations** and that they will be afforded whistleblower protection (see 48 C.F.R. 252.222-7007).

4. Awareness Program

4.1 HJF requires all employees to complete online training on combating human trafficking and conduct in-person compliance training as needed throughout the year.

4.2 HJF ensures that its employees are aware of HJF's policy on combating human trafficking through online training, the HJF CTIP Policy, the HJF CTIP SOP, the HJF's Code of Ethics and this Compliance Plan.

5. Certifications

5.1 Prior to the award of an applicable contract, grant or cooperative agreement, and annually after receiving an award, HJF will provide the required certification to the appropriate party.

5.2 Prior to the award of a subcontract or subaward, and annually during performance of the subcontract or subaward, HJF shall obtain a certification from each applicable subcontractor, subrecipient or other lower-tier vendor .

5.3 HJF and applicable lower-tier vendors will certify substantially as follows:



- a) Its policies and practices prohibit engaging in the trafficking of persons, the use of forced labor, or the procuring of commercial sex acts in the country or countries in which it conducts business;
- b) If applicable, it has implemented a Compliance Plan to prevent any prohibited activities identified at FAR 52.222-50(b) or 2 CFR Part 175.105(a), as applicable, and to monitor, detect, and terminate any subrecipient, agent, subcontract or subcontractor employee engaging in prohibited activities; and
- c) After having conducted due diligence, either (a) to the best of its knowledge and belief, neither it nor any of its subrecipient, agent, subcontractors, or their agents is engaged in any such activities; or (b) if abuses relating to any of the prohibited activities identified in FAR 52.222-50(b) or 2 CFR 175.105(a), as applicable, have been found, the subcontractor or agent has taken the appropriate remedial and referral actions.
- d) It has reviewed and understands the HJF CTIP Policy.



APPENDIX A
HJF Combating Trafficking in Persons Policy