



Combating Trafficking in Persons Policy and Compliance Plan

Background and Purpose

The U.S. Government has a zero-tolerance policy regarding any Government employees, contractor personnel, and their agents engaging in any form of trafficking in persons. FSG stands behind and wholeheartedly supports this zero-tolerance policy. The purpose of this Combating Trafficking in Persons Policy (“Policy”) and Compliance Plan (“Plan”) is to 1) make FSG employees aware of conduct prohibited under the government’s Anti-Trafficking Provisions, and 2) outline a compliance mechanism to ensure FSG does its part to combat trafficking in persons.

Applicability

The Policy applies to employees, contractors, subcontractors, and agents of FSG performing work under federal contracts subject to Federal Acquisition Regulation (“FAR”) [52.222-50 – Combating Trafficking in Persons](#). FSG is adopting this policy firm wide, and will extend compliance to all agents and contractors working on federally-funded projects on behalf of FSG.

Policy

The policy components below read directly from and are the minimum requirements of the FAR clause.

FSG employees, agents, contractors, and subcontractors (a) shall fully comply with all applicable labor and employment laws, rules and regulations, and (b) shall not:

1. Engage in severe forms of trafficking in persons;
2. Procure commercial sex acts;
3. Use forced labor;
4. Destroy, conceal, confiscate or otherwise deny access by an employee to their own identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
5. Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language understood by the employee or potential employee, 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 employer or agent provided or arranged), any significant costs to be charged to the employee or potential employee, and, if applicable, the hazardous nature of the work or use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;

6. Charge employees recruitment fees;
7. Fail to provide return transportation or pay for the cost of return transportation upon the end of employment: (i) 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 performed outside the United States); (ii) or for an employee who is not a United States national and who was brought into the United States for the purpose of working 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 contracts performed inside the United States); except that:
 - a. The requirements of this paragraph (7) shall not apply to an employee who is legally permitted to remain in the country of employment and who chooses to do so or exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation;
 - b. The requirements of paragraph (b)(7)(i) of this clause are modified for a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons. The contractor shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. For example, the contractor shall not only offer return transportation to a witness at a time when the witness is still needed to testify. This paragraph does not apply when the exemptions at paragraph (b)(7)(ii) of this clause apply.
8. Provide or arrange housing that fails to meet the host country housing and safety standards; or
9. If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

Disciplinary Action

FSG will take appropriate action against employees, agents, contractors, and subcontractors that violate this Policy and Plan, which action may include, but is not limited to, the following, as applicable:

1. Removal of employees from the contract, or requiring the subcontractor to remove a subcontractor employee or employees from the contract;
2. Termination of employment;
3. Termination of the contract for default or cause or requiring the subcontractor to terminate a contract; or
4. Termination of the business relationship with the subcontractor.

Compliance Plan

FSG has established the following compliance plan to enforce the Policy.

1. Awareness Program and Posting

FSG makes this Policy and Plan available to employees on its intranet platform, requires signed acknowledgement of this Policy by all employees, and includes acknowledgement of this Policy in all applicable contracts.

2. Reporting Mechanism

FSG employees, contractors, subcontractors and agents are required to report any violations of or activity inconsistent with the U.S. Government's policy prohibiting trafficking in persons set forth in the Policy and may do so without fear of retaliation by contacting FSG's Chief Financial Officer, and may also contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email at help@befree.org.

3. Recruitment and Wages

FSG only permits the use of recruitment companies that provide proper training to employees, do not charge recruitment fees to employees, and that have established procedures to ensure that wages meet applicable host country legal requirements.

4. Housing Plan

In situations where FSG provides housing to employees, the housing will meet host country housing and safety standards.

5. Compliance Procedures

In order to prevent agents and subcontractors at any tier and at any dollar values from engaging in trafficking in persons (including the activities identified in the U.S. Government's policy prohibiting trafficking in persons set forth in FAR 52.222-50(b)) and to monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in such activities, agents and subcontractors performing work under a federal contract subject to FAR 52.222-50(h) certify compliance with the regulation by their entering into a contract with FSG. FSG will include language to that effect in all supplier contracts and subcontracts. This certification is designed to provide FSG with sufficient information to adequately assess the practices of its agents and subcontractors with respect to combating trafficking in persons compliance. If FSG determines that there is a reasonable risk that an agent or subcontractor has engaged in trafficking in persons (including the activities identified in the U.S. Government's policy prohibiting trafficking in persons set forth in FAR 52.222-50(b)), or has otherwise violated FAR 52.222-50, FSG will determine and administer disciplinary action in accordance with the terms of this Policy and Plan.

Signed and agreed to by:

EMPLOYEE (signature)

TODAY'S DATE

EMPLOYEE (print name)