



Title: **Anti-Trafficking Compliance Plan**

Document No. :	QMSP 04-511	Revision:	1.0	Release Date:	05/25/2017
Process Owner:	Human Resources	Approval:	Director, Human Resources		

## 1. PURPOSE

SOSi’s Anti-Trafficking Policy (the “**SOSi Trafficking Policy**”) requires compliance with all applicable U.S. and local legal requirements prohibiting human trafficking. This plan (the “**Plan**”) has been developed to implement the compliance plan requirements set forth in Federal Acquisition Regulation (FAR) 52.222-50(h). As used in this Plan, the term “covered contract” means any U.S. government contract or subcontract that incorporates that FAR clause.

## 2. APPLICABILITY

A compliance plan is mandatory whenever SOSi or any wholly-owned or controlled subsidiary is performing work on a covered contract. This Plan shall serve as the compliance plan for all covered contracts unless modifications to the Plan are necessary due to the size and complexity of the contract or the nature and scope of the activities to be performed for the U.S. government, in which case a modified plan will be drafted specifically for that contract. Subject to the next sentence, this Plan also applies to all SOSi subcontractors and other supply chain partners when the covered contract 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 have an estimated value exceeding US\$500,000. When applicable, supply chain partners must adopt this Plan or certify in writing that they have in place a compliance plan satisfying the requirements of FAR 52.222-50(h), providing a copy upon request.

In the event any covered contract has stricter provisions relating to human trafficking than those contained in this Plan, the stricter provisions must be followed.

## 3. PLAN REQUIREMENTS


### 3.1. Awareness Program

Consistent with the U.S. government’s zero tolerance policy, the SOSi Trafficking Policy mandates that SOSi employees and supply chain partners not engage in any practice constituting human trafficking. It details prohibited trafficking-related activities—including the activities set forth in FAR 52.222-50(b)—and the actions that will be taken for violations. The prohibitions are reinforced in the SOSi Code of Business Ethics and Conduct and the SOSi Supplier Code of Conduct.

The SOSi Trafficking Policy and this Plan are posted on SOSi’s website and are accessible by all employees, and company-wide emails are used to alert employees to policy and plan updates.

All new SOSi employees are required to read and acknowledge the SOSi Trafficking Policy and the SOSi Code of Business Ethics and Conduct as part of the onboarding process. All employees are required to complete an annual online ethics training program among other mandated compliance training activities.

SOSi’s Procurement Policies and Procedures Manual also addresses policies and procedures to mitigate the risk of human trafficking, and all SOSi employees with supplier delegation of authority are trained on this topic. SOSi provides other specialized training as needed.

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The SOSi Code of Business Conduct and Ethics and the SOSi Supplier Code of Conduct are also publicly available on the SOSi Ethics Helpline homepage at [sosi.ethicspoint.com](http://sosi.ethicspoint.com).

### 3.2. Process to Report

Employees, agents, subcontractors, suppliers and other business partners are required to report any conduct believed to be a violation of the SOSi Trafficking Policy and have been provided multiple means of doing so, including by contacting:

- SOSi's Legal Department;
- SOSi's Compliance team at [compliance@sosi.com](mailto:compliance@sosi.com);
- SOSi's Ethics Helpline at [sosi.ethicspoint.com](http://sosi.ethicspoint.com), which allows for both anonymous and attributable reporting;
- The Global Human Trafficking Hotline at 1-844-888-FREE or through its email address at [help@befree.org](mailto:help@befree.org); or
- The U.S. Defense Department reporting hotline at <http://ctip.defense.gov/>.

SOSi's Ethics Helpline is operated by an industry-leading third-party provider and allows a report to be made online or by telephone and provides for anonymous reporting.

SOSi will investigate allegations and take appropriate corrective action, if warranted.

Employees, subcontractors, suppliers and other business partners are also advised that the failure to report actual or suspected improper conduct may be deemed a violation of the SOSi Trafficking Policy as permitted by applicable law.

SOSi does not tolerate retaliation against any person for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

### 3.3. Recruitment and Wage Plan

SOSi uses only internal recruiters or third-party recruitment companies that have trained employees, prohibit charging recruitment fees to the candidate, ensure that wages meet applicable host-country legal requirements or explain any variance, and otherwise observe the anti-trafficking requirements set forth in the SOSi Trafficking Policy.

### 3.4. Housing Plan

To the extent housing is being provided or arranged by SOSi or its supplier, SOSi requires that the housing meet host country housing and safety standards. When operating in a contingency environment like Camp Taji, Iraq, personnel are provided housing that meets the normalized housing and safety standards applicable to a base life support environment.

### 3.5. Procedures for Agents, Subcontractors, Suppliers and Other Business Partners

SOSi supply chain partners are required to comply with the SOSi Supplier Code of Conduct and the SOSi Trafficking Policy whether or not they are supporting a covered contract. If



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they are supporting a covered contract, they must additionally comply with this Plan if applicable. The contractual arrangement between SOSi and each supply chain partner will incorporate all applicable FAR clauses and other “flow down” provisions, including the substance of FAR 52.222-50 when required. The contractual arrangement will also include SOSi requirements designed to monitor, detect and address potential violations.

**3.6. Posting**

The Plan is posted at the workplace (unless the work is to be performed in the field or not in a fixed location) and on SOSi’s website. It is also available to the Contracting Officer upon request.

**4. CERTIFICATION**

Annually after having received award of a covered contract, SOSi will submit a certification to the Contracting Officer that:

- (1) it has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect, and terminate any agent, subcontractor, supplier or other business partner engaging in prohibited activities, and
- (2) after having conducted due diligence, either:
  - a. to the best of SOSi’s knowledge and belief, neither it nor any of its agents, subcontractors, suppliers, other business partners or their employees or agents is engaged in any such trafficking activities; or
  - b. if abuses relating to any of the prohibited activities have been found, SOSi or its agent, subcontractor, supplier or other business partner has taken the appropriate remedial and referral actions.

Applicable supply chain partners are required to deliver the same annual certification to SOSi.


**5. NOTIFICATION**

SOSi shall inform the Contracting Officer and the agency Inspector General immediately upon receipt of any credible information from any source (including host country law enforcement) alleging a violation of FAR 52.222-50 and of any actions taken against an employee of SOSi, an agent of SOSi or an employee or agent of a SOSi subcontractor, supplier, or other business partner pursuant to FAR 52.222-50.

If the allegation may be associated with more than one covered contract, SOSi shall inform the Contracting Officer for the contract with the highest dollar value.

**6. FULL COOPERATION**

SOSi is required to cooperate fully in providing timely and complete responses to government auditors’ and investigators’ requests for documents. Additionally, SOSi must provide reasonable access to its facilities and staff to allow contracting agencies and other responsible Federal agencies to conduct audits, investigations, or other actions to ascertain compliance with applicable federal law. SOSi must ensure that all suspected victims of trafficking and witnesses

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to prohibited activities are protected and not otherwise prevented or hindered from cooperating with government authorities. Individual SOSi employees must coordinate all communications with government auditors and investigators through SOSi's Legal Department. The obligation to fully cooperate with government auditors and investigators does not require SOSi, or any individual employees, to waive their attorney-client privilege or their 5th Amendment rights and does not otherwise restrict SOSi from conducting internal investigations or defending itself in a dispute regarding an alleged violation of any anti-human trafficking statute or regulation.

## 7. RELATED DOCUMENTS

- Anti-Trafficking Policy QMSP 04-510
- SOSi Code of Business Ethics and Conduct
- SOSi Supplier Code of Conduct

## 8. RIGHT TO REVISE

This Plan is provided for informational purposes only and its contents are subject to change without notice. In the event of any inconsistency between this document and any translation into another language, the English language meaning shall control. SOSi specifically disclaims any liability with respect to this document, and no contractual obligations are formed by it, either directly or indirectly.