

	Title: Anti-Trafficking Policy					
	Document No. :	QMSP 04-510	Revision:	1.0	Release Date:	05/25/2017
	Process Owner:	Human Resources	Approval:	Director, Human Resources		

1. PURPOSE

This policy conveys SOSi's commitment to a work environment that is free from human trafficking, an umbrella term used to describe the activities involved when someone obtains or holds a person in forced service.¹ This policy is consistent with the SOSi Code of Business Ethics and Conduct and the SOSi Supplier Code of Conduct.

2. SCOPE

This policy applies to SOSi and its wholly-owned or controlled subsidiaries.

3. POLICY STATEMENT


Human trafficking—the worldwide criminal exploitation of men, women, and children for others' financial gain—is a violation of human rights. Victims are often lured or abducted and forced to work in involuntary servitude. Although the crime of human trafficking can take different forms in different regions and countries around the world, most human trafficking cases follow a similar pattern. Traffickers use acquaintances or false advertisements to recruit men, women, and children in or near their homes, and then transfer them to and exploit them in another city, region, or country.²

Consistent with the U.S. government's zero tolerance policy, SOSi does not tolerate or condone human trafficking in any form. SOSi employees, agents, subcontractors, suppliers and other business partners through whom SOSi does business must not engage in any practice that constitutes human trafficking. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons;
- Procuring commercial sex acts;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the individual's identity or immigration documents, such as a passport or driver's license, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions, such as:
 - failing to disclose, in a format and language accessible to the potential candidate, basic information or
 - making material misrepresentations during the recruitment of candidates regarding the key employment terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer

¹ See the U.S. State Department Office to Monitor and Combat Trafficking in Persons website for additional details: <https://www.state.gov/j/tip/>.

² U.S. Government Accountability Office Report, Human Trafficking: Oversight of Contractors' Use of Foreign Workers in High Risk Environments Needs to be Strengthened, November 2014 (<http://www.gao.gov/assets/670/666998.pdf>).

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or agent provided or arranged), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;

- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place or that do not pay wages that meet the host country's legal requirements;
- Charging candidates recruitment fees;
- Failing to provide return transportation or to pay for the cost of return transportation upon the end of the employment arrangement 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. This requirement will not apply to the extent the individual is legally permitted to remain in the country of employment and chooses to do so or when the individual is exempted from the requirement by an authorized official of the contracting agency;
- If required by law or contract, providing or arranging housing that fails to meet the host country's housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing in a language understood by the recipient. 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.

SOSi complies with, and requires its agents, subcontractors, suppliers and other business partners to comply with, all U.S. and local legal requirements prohibiting human trafficking, including, when applicable:

- Federal Acquisition Regulation 52.222-50, Trafficking in Human Persons;
- Defense Federal Acquisition Regulation Supplement (DFARS) 252.222-7007 (Representation Regarding Combating Trafficking in Persons) and 252.225-7040 (Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States); and
- U.S. Central Command-Joint Theater Support Contracting Command (C-JTSCC) Clause 952.222-0001, Prohibition Against Human Trafficking, Inhumane Living Conditions, and Withholding of Employee Passports.

See SOSi's Anti-Trafficking Compliance Plan for further details.

4. QUESTIONS

SOSi employees who have questions about this policy should contact their manager, SOSi's Human Resources Department, SOSi's Legal Department or SOSi's Compliance team at compliance@sosi.com.

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SOSi agents, subcontractors, suppliers and other business partners who have questions about this policy should contact their designated point of contact in SOSi's Procurement Department.

5. REPORTING VIOLATIONS

SOSi employees, agents, subcontractors, suppliers and other business partners should report any conduct believed to be a violation of this policy by contacting SOSi's Compliance team at compliance@sosi.com, SOSi's Legal Department or SOSi's Ethics Helpline at sosi.ethicspoint.com. The Ethics Helpline is operated by an industry-leading third-party provider, 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. Individuals may also report activity inconsistent with this policy to the Global Human Trafficking Hotline at 1-844-888-FREE or through its email address at help@befree.org. The U.S. Defense Department also provides a reporting hotline at <http://ctip.defense.gov/>.

Employees, agents, subcontractors, suppliers and other business partners who fail to report actual or suspected improper conduct may be deemed in violation of this 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.

6. POLICY NON-COMPLIANCE


Any SOSi employee, agent, subcontractor, supplier or other business partner who violates this policy is subject to disciplinary action up to and including termination. Depending on the contract award, the U.S. government may also impose penalties, including:

- requiring that employees be removed from the contract;
- requiring termination of a subcontract or other supply agreement;
- suspending contract payments;
- loss of award fees for the performance period of non-compliance;
- declining to exercise available options;
- terminating the contract for cause; or
- suspending or debaring the contractor.

Violation of applicable laws may also result in criminal prosecution of responsible individuals.

7. RELATED DOCUMENTS

- SOSi Code of Business Ethics and Conduct
- SOSi Supplier Code of Conduct
- Anti-Trafficking Compliance Plan QMSP 04-511

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8. RIGHT TO REVISE

This policy 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.