

# Combating Trafficking in Persons Compliance Plan

HRP 057  
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Version 1.0



RELENTLESSLY DRIVING INNOVATION

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# 1 Purpose

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T-Rex and the United States Government prohibit trafficking in persons. The U.S. Government's policy prohibiting trafficking in persons is available at 48 CFR § 52.222-50 and is summarized below under the heading: "Summary of U.S. Government Policy of Prohibiting Trafficking in Persons."

T-Rex is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. T-Rex will not tolerate or condone human trafficking or slavery in any part of our global organization.

T-Rex employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom T-Rex conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

Any violation of this policy may be grounds for disciplinary action, up to and including termination. T-Rex and its subsidiaries have the exclusive right to interpret this policy regarding their respective employees.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

It is T-Rex's policy to demonstrate through its actions that human rights violations are avoidable and unacceptable. T-Rex will not willingly or knowingly assist in any violation of human rights or benefit from any human rights violation committed by another party. Human rights violations include, but are not limited to, the direct or indirect procurement or use of commercial sex acts, forced labor, child labor, debt bondage, involuntary servitude and sex trafficking.

## ***1.1 Summary of U.S. Government Policy of Prohibiting Trafficking in Persons***

U.S. Government policy prohibits trafficking in persons and slavery. Government contractors and their employees, subcontractors, subcontractor employees, and agents must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities (not already identified):

- 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 employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.

# 2 Scope

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This policy applies to all personnel employed by or engaged to provide services to T-Rex, including, but not limited to, employees, officers, and temporary employees of T-Rex and T-Rex's U.S. and international subsidiaries, and independent contractors (for ease of reference throughout this policy, "employees").

## 3 Combating Trafficking in Persons - Recruitment Activities and Employee Awareness

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### 3.1 External Recruitment Agency Support

In collaboration with the Contract's organization's program for monitoring components, see Section 4, T-Rex People Operations will ensure all contracts with external recruitment agencies or firms include the following contract clauses, as applicable, to facilitate compliance with prime contract requirements regarding human trafficking, in addition to requiring such agencies or firms to adhere to all applicable local, state, and national government laws:

- FAR 52.222-50 Combating Trafficking in Persons (applies to all subcontracts and contracts with agents).
- DFARS 252.203-7004 Display of Hotline Posters, as appropriate (applies to subcontracts under Department of Defense prime contracts that exceed \$5 million except when the subcontract is for the acquisition of a commercial item).
- DFARS 252.225-7040 Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States (applies to subcontracts under Department of Defense prime contracts that require subcontractor personnel to be available to deploy with or otherwise provide support in the theater of operations to U.S. military forces deployed outside the United States in (1) contingency operations; (2) humanitarian or peacekeeping operations; or (3) other military operations or exercises designated by the Combatant Commander).

### 3.2 Recruitment

T-Rex will not use recruiters that do not comply with local labor laws of the country in which the recruiting takes place and will not charge applicants recruiting fees. If required by law or contract, T-Rex will provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.

T-Rex's Hiring Managers, Talent Acquisition team, and contracted recruitment agencies that support recruitment activities must adhere to all internal policies (domestic and international) and host-country recruitment standards to combat trafficking in persons and trafficking related activities.

### 3.3 Wage Plan

T-Rex ensures that employee wages meet host-country legal requirements.

### 3.4 Housing Plan

If required by law or contract, T-Rex will provide or arrange housing that meets the host country housing and safety standards.

### **3.5 Employee Awareness Program**

This plan, HRP 057, Combating Trafficking in Persons Compliance Plan is published in the T-Rex Process Asset Library, available to all employees. All employees are required to comply with this plan.

Every employee is responsible for reading, understanding, and complying with this plan. T-Rex managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them. If you have any questions or concerns relating to this policy, consult Chief People Officer or send email to [PO@trexsolutionsllc.com](mailto:PO@trexsolutionsllc.com).

### **3.6 Training and Other Assistance**

Every employee is responsible for reading, understanding, and complying with this policy. T-Rex managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them.

If an employee requires guidance on any aspect of the plan, they should consult their manager, People Operations, or the Ethics Officer for guidance on the policies, procedures, or the law.

### **3.7 Process for Reporting Violations**

Report any conduct that you believe to be a violation of this policy to the T-Rex Ethics Hotline at 1-877-647-3335, Code 7037420566, which allows anonymous reporting as permitted by applicable law. The T-Rex Chief People Office or Ethics Officer may also be contacted.

All persons, including T-Rex employees, contractors, contingent workers, and suppliers may also report any actual or suspected human rights violation to any of the resources listed above or the Global Human Trafficking Hotline (1-844-888-FREE or [help@befree.org](mailto:help@befree.org)).

Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy.

### **3.8 Preventing Violations**

T-Rex will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this policy may be grounds for disciplinary action, up to and including termination. T-Rex and its subsidiaries have the exclusive right to interpret this policy regarding their respective employees and subcontract employees.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

### **3.9 Periodic Reassessment of the Plan**

T-Rex will periodically review and assess the internal controls assuring compliance with this Plan with modifications implemented as required.

## 4 Trafficking in Persons Compliance Plan for Global Supply Chain Contracts

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### 4.1 *Monitoring of Government Databases*

T-Rex monitors the U.S. Government's System for Award Management (SAM) Exclusions database and other restricted parties lists and complies with applicable limitations on award to debarred, suspended, proposed for debarment, or otherwise restricted subcontractors.

### 4.2 *Flowdowns*

All subcontracts include mandatory flow down clauses necessary to ensure compliance with this Plan and the requirements of prime contracts. This includes the following:

- FAR 52.222-50 Combating Trafficking in Persons (applies to all subcontracts and contracts with agents).
- DFARS 252.203-7004 Display of Hotline Posters (applies to subcontracts under Department of Defense prime contracts that exceed \$5 million, except when the subcontract is for the acquisition of a commercial item).
- 252.225-7040 Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States (applies to subcontracts under Department of Defense prime contracts that require subcontractor personnel to be available to deploy with or otherwise provide support in the theater of operations to U.S. military forces deployed outside the United States in (1) contingency operations; (2) humanitarian or peacekeeping operations; or (3) other military operations or exercises designated by the Combatant Commander)).

### 4.3 *Contractual Requirements for Compliance with Applicable Laws*

T-Rex's subcontract terms and conditions require subcontractors to comply with applicable laws and regulations.

### 4.4 *Certification*

T-Rex will obtain trafficking in persons certifications from subcontractors required to certify under FAR 52.222-50. Certificates will be required before award of subcontracts and annually thereafter when performance extends beyond one year.

### 4.5 *Obtaining and Reviewing Supplier Compliance Plans*

T-Rex will require subcontractors to provide copies of their trafficking in persons compliance plan upon request of either the contracting officer or T-Rex. Plans may also be required when needed in conducting due diligence of supplier compliance.

### 4.6 *Registry as a T-Rex Supplier*

Prospective international subcontractors are required to disclose certain contractor integrity and anticorruption information prior to being eligible for receipt of subcontracts. Among the disclosures required is whether the subcontractor has been convicted of, indicted or otherwise charged by any governmental entity for the commission of among other things, violation of human trafficking or child labor laws. Subcontractors are required

to inform T-Rex if their status changes. If a supplier discloses a violation, the matter will be investigated and appropriate action taken.

#### ***4.7 Supplier Code of Conduct***

T-Rex maintains a Supplier Code of Conduct (COP 007) which is published on T-Rex's public website and referenced on all purchase orders. It includes a section on Human Rights that is required of all suppliers.

#### ***4.8 Monitoring of Contracts Performed Outside the United States***

When T-Rex personnel are present in international areas where subcontractors are performing work, the activities of the subcontractors will be monitored for potential trafficking problem or issues. If issues are suspected or found, the matter will be investigated, and appropriate action taken.

#### ***4.9 Monitoring Third Party Sources of Information***

T-Rex monitors multiple sources of third-party information. If adverse information concerning a T-Rex supplier is discovered, the matter will be investigated, and appropriate action taken.

#### ***4.10 Investigations***

T-Rex will investigate evidence or allegations that subcontractors have violated human trafficking prohibitions. Subcontractors are required by T-Rex's terms and conditions of purchase to provide reasonable cooperation to T-Rex in conducting any investigation regarding the nature and scope of any failure by the subcontractor or its personnel to comply with applicable local, state, and federal laws, orders, rules, regulations, and ordinances that may affect the performance of the subcontractor's obligations under this Contract.

T-Rex will make appropriate disclosures to the U.S. Government of violations by subcontractors and cooperate with any Government investigation.

#### ***4.11 Remedies***

T-Rex will take appropriate action when subcontractors are found to engage in prohibited conduct, including the remedies specified in FAR 52.222.50. Where appropriate or required, T-Rex will coordinate with the U.S. Government prior to the implementation of remedies against subcontractors.

#### ***4.12 Eligibility for Future Contracts***

T-Rex considers the record of a subcontractor's compliance with human trafficking requirements when making future subcontractor source selections. Subcontractors that have engaged in prohibited conduct may be excluded from eligibility of future awards.

#### ***4.13 Training and Other Assistance***

Suppliers needing assistance with developing compliance plans will be provided copies of T-Rex's Compliance Plan as needed.

#### ***4.14 Periodic Reassessment of the Plan***

T-Rex will periodically review this Plan. Additional or different controls and measures will be implemented as required.

## 5 Key Terms

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The terms below are defined in the Federal Acquisition Regulation (FAR), Subpart 22.17 – Combating Trafficking in person.

- **Commercial Sex Act:** any sex act for which anything of value is given to or received by any person.
- **Debt Bondage:** the status or condition of a debtor arising from a pledge by the debtor of his/her personal services or of those of a person under his/her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.
- **Forced Labor:** 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.
- **Involuntary Servitude:** includes a condition of servitude induced by means of (1) any scheme, plan or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or (2) the abuse or threatened abuse of the legal process.
- **Sex Trafficking:** the recruitment, harboring, transportation, provision or obtaining of a person for the purpose of a commercial sex act.
- **Severe forms of trafficking in persons:** means (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.

## 6 Exceptions

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There are no exceptions to this policy.

## 7 Related Standards, Policies and Processes

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- HRP 012 Equal Employment Opportunity
- HRP 049 Non-Retaliation Policy
- HRP 035 Anti-Harassment Policy

## 8 Revision History

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Version	Author	Changes	Date
1.0	Chief People Officer	New Policy	12/16/2022