

Combating Trafficking in Persons Compliance Plan

Version 1.0

Purpose

As specified in the Federal Acquisition Regulation (FAR 52.222-50) and Executive Order 13627 Strengthening Protections Against Trafficking in Persons in Federal Contracts, Predicate Logic is required to develop and maintain a compliance plan during the performance of contract(s) or subcontract(s) that is appropriate for the size and complexity of the contract or subcontract and the nature and scope of the activities performed, including the risk that the contract or subcontract will involve services or supplies susceptible to trafficking. In accordance with our “Combating Trafficking in Persons” policy published in our Employee Handbook, this document describes:

- i) Awareness program
- ii) Process for employees to report violations
- iii) A recruitment and wage plan
- iv) Housing Plan
- v) Procedures to prevent agents and subcontractors from engaging in trafficking in persons

This Compliance Plan will be provided to the contracting officer upon request. Additionally, relevant contents of the plan will be posted in the workplace and on our website. This plan’s policies and procedures are provided in two sections: Company and its subcontractors.

1. Introduction

Our company’s policies, procedures, and practices reflect our strong commitment to good corporate citizenship. This commitment applies to all employees, including the Predicate Logic Board of Directors, and others who represent or act for us.

Employees, agents, subcontractors, and recruiters play a key role in preventing human trafficking and related activities. Human trafficking and related activities include 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.

1.1 Recruitment

Predicate Logic’s Business Managers must adhere to all internal policies (domestic and international) and host-country recruitment standards to combat trafficking in persons and trafficking related activities. Predicate Logic prohibits charging of recruitment fees to employees and prospective employees and prohibits the use of any recruiting firms unless the firm’s employees have received training on combating trafficking related activities.

- 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).

1.2 Wage Plan

Predicate Logic ensures that employee wages meet host-country legal requirements or explains any variance. Predicate Logic maintains a comprehensive total remuneration program providing compensation and benefits that comply with country-specific laws and regulations and are competitive with external, country-specific labor markets and levels of employee performance.

1.3 Housing Plan

For those employees entitled to Overseas Housing Allowance or reimbursement for housing that is necessary for the assignment, adherence to Predicate Logic policies business policies, along with host-country housing and safety standards is mandatory.

1.4 Employee Awareness Program

Predicate Logic's Corporate Policy Statement, Combating Trafficking in Persons is published in Predicate Logic's **Employee Handbook** and is the primary tool utilized for employee awareness. This policy requires all employees to comply with FAR 52.222-50, Combating Trafficking in Persons, and specifies that violations may result in disciplinary action, up to and including termination of employment. Predicate Logic's awareness program includes a communications posters to ensure ongoing awareness is provided such as Figure 1.

Figure 1. Trafficking in Persons Awareness Poster



HUMAN TRAFFICKING

WHAT YOU CAN DO ABOUT IT

LOOK
FOR SIGNS THAT SOMEONE MAY BE TRAFFICKED

- Unable to leave their job
- Does not control their earnings
- Unable to move freely or is being watched or followed
- Is afraid to speak in the presence of others
- Shows signs of being assaulted or otherwise harmed (denial of food, water, sleep, medical care)
- Passports and other documents have been taken away
- Has been cheated into paying debt

REPORT
WHAT YOU SEE

- National Trafficking Hotline
1-888-373-7888
- Immigration and Customs Enforcement Hotline
1-866-347-2423
- www.dhs.gov/humantrafficking

BUY
PRODUCTS WITHOUT TRAFFICKING IN THEIR SUPPLY CHAINS

Cocoa **Electronics** (Conflict Minerals) **Coffee** **Agriculture**

1.5 Training and Assistance

Predicate Logic provides training developed by the DoD's Combating Trafficking in Persons agency that supports our commitment to human rights.

Should an employee be unsure of what to do in a particular situation or for guidance on any aspect of the policy, they should consult their Supervisor, Human Resources, or the President for guidance on the policies, procedures, or the law.

1.6 Process for Reporting Violations

Any credible information received from any source (including host country law enforcement) that an employee, subcontractor, subcontractor employee, or their agent has violated FAR 52.222-50 must be reported immediately to their Supervisor, who will further notify Human Resources of the report.

Contracts Administrator, in consultation with the President, will inform the Contracting Officer and Inspector General of the allegation. Element Legal Counsel will make any other disclosures required under FAR 52.203-13. Employees may also report, without fear of retaliation, activity

inconsistent with the policy prohibiting trafficking in persons to Ethics, element Legal Counsel, and the Global Human Trafficking Hotline (1-844- 888-FREE; help@befree.org).

If a violation of FAR 52.222-50 is substantiated:

- Human Resources, in consultation with element Legal Counsel, will ensure that the appropriate disciplinary action is taken;

1.7 Periodic Reassessment of the Plan

Predicate Logic will periodically review and assess the internal controls assuring compliance with this Plan. Modification of controls and measures will be implemented as required.

2. Subcontractors

Predicate Logic uses subcontractors in the performance of its contracts. This includes domestic U.S. companies that perform work under contracts outside the United States that perform work throughout the world. Subcontractors play a key role in preventing human trafficking and related activities. To minimize the risk of human trafficking, and to comply with contractual requirements to prevent human trafficking in connection with contracts, Predicate Logic employs a multifaceted approach to address the risk of human trafficking in its supply chain.

2.1 Reviewing Government Databases

Predicate Logic review 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.

2.2 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)).

2.3 Contractual Requirements for Compliance with Applicable Laws

Predicate Logic's subcontract terms and conditions require subcontractors to comply with applicable laws and regulations. A typical provision reads as follows:

SELLER, in the performance of this Contract, shall comply with all applicable local, state, and federal laws, orders, rules, regulations, and ordinances. SELLER shall procure all licenses/permits, pay all fees, and other required charges and shall comply with all applicable guidelines and directives of any local, state and/or federal governmental authority.

2.4 Certifications

Predicate Logic will obtain trafficking in persons certifications from subcontractors required to certify under FAR 52.222-50. Certificates will be required before award of subcontracts.

2.5 Obtaining and Reviewing Supplier Compliance Plans

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

2.6 Investigations

Predicate Logic will investigate evidence or allegations that subcontractors have violated human trafficking prohibitions. Subcontractors are required by Predicate Logic's terms and conditions of purchase to *"provide reasonable cooperation to Predicate Logic 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."*

Predicate Logic will make appropriate disclosures to the U.S. Government of violations by subcontractors and cooperate with any Government investigation.

2.7 Remedies

Predicate Logic 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, Predicate Logic will coordinate with the U.S. Government prior to the implementation of remedies against subcontractors.

2.8 Eligibility for Future Contracts

The record of a subcontractor's compliance with human trafficking requirements will be considered in making future subcontractor source selections. Subcontractors that have engaged in prohibited conduct may be excluded from eligibility of future awards.