

Title:	Combating Trafficking in Persons Policy	Number:	01-01.0
Originator:	R. Bastien	Effective Date:	16-APR-2015
Approver:	Chief Executive Officer (original signed by D. Kitani)	Revision:	05

SUMMARY OF CHANGES:

- Incorporating new Federal Acquisition Regulation (FAR) and Defense Federal Acquisition Regulation Supplement (DFARS) requirements

POLICY STATEMENT

The U.S. Government has adopted a Government-wide “zero tolerance” policy prohibiting human trafficking in Federal contracting. In all federal contract activities to which IAP Worldwide Services, Inc. (“IAP” or “Company”, and its affiliates, subsidiary or subordinate entities) is a party, it is the policy of the Company to comply with all applicable U.S. laws and regulations relating to trafficking in persons. In accordance with the terms and limitations specified in FAR Subpart 22.17, FAR 52.222-50, FAR 52.222-56 and associated DFARS provisions, the Company, its employees, independent contractors, subcontractors, and each of their respective employees and agents are strictly prohibited from engaging in the following practices:

1. Severe forms of trafficking, which is defined in Section 103 of the Trafficking Victims Protection Act as: (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;
2. Procuring a commercial sex act, which is defined as any sex act on account of which anything of value is given to or received by any person, during the period of performance of a U.S. Government contract;
3. Use of forced labor, which is defined in 18 U.S. Code 1589 as 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; during the performance of a U.S. Government contract;
4. 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;
5. Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, 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 provided or arranged by employer or agent), any significant costs to be charged to the employees, and, if applicable, the hazardous nature of the work;
6. Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
7. Charging employees recruitment fees;

8. Failing to provide return transportation or pay for the cost of return transportation upon the end of employment 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; or for an employee who is not a U.S. national brought into the U.S. to work 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. This does not apply to any employee who is (a) legally permitted to remain in the country of employment and who chooses to do so; or (b) is exempted from the requirement by an authorized official of the agency.
9. Providing or arranging housing that fails to meet host country housing or safety standards;
10. If required by law or contract, failing to provide a written employment contract, recruiting agreement or work document, in a language understood by the employee. If the employee is relocating to the work location, such written document shall be provided to the employee at least five (5) days prior to the relocation. Such document shall provide sufficient details regarding the employee's wages, benefits, work location, housing, time-off, return transportation, grievance procedures and a summary of the anti-trafficking prohibitions.

Employees working outside the U.S. shall comply with all general orders and military listings of off-limits notices prohibiting patronage at particular establishments.

Employees found to have violated this Policy will face disciplinary action up to, and including, termination of employment. If IAP determines that an employee has violated this Policy, the Company will report the incident to the U.S. Government Contracting Officer, as required by law.

This Policy covers employees during on and off-duty hours. Violations should be immediately reported to the IAP Ethics Hotline at 1-877-296-8010, or at www.iapws.ethicspoint.com.

Further guidance appears in the Company Code of Ethics and Business Conduct handbook located on the Company Portal in two locations: 1) Business Operating System tab, Policies; and 2) the Legal Department's Homepage. Hardcopies of the handbook may also be obtained by contacting the Legal Department at 321-784-7142 and can also be found on the external website at www.iapws.com.

**Employee and Subcontractor Certification
Combating Trafficking in Persons**

The U.S. Government has adopted a “zero tolerance” policy regarding federal Contractors and Contractor employees that engage in or support severe forms of trafficking in persons, procure commercial sex acts, use forced labor in the performance of any contract, or engage in fraudulent or misleading recruitment and housing practices. It is the policy of the IAP Worldwide Services, Inc. and its subsidiaries and affiliates (“Company”) to comply with all applicable U.S. laws and regulations relating to trafficking in persons.

By signing this document, I acknowledge that I have been given a copy of the Company’s Combating Trafficking In Persons Policy, dated April 16, 2015. I also acknowledge that I have read and understood the prohibited conduct, and the actions the Company is required to take upon receipt of any allegations of suspected trafficking activity, which includes immediate referral of credible information to appropriate Government officials.

I also understand my own obligations to report any suspected trafficking activities, by any Company employee or agent, or by any subcontractor employee or agent, in performance of a contract with the U.S. Government. I may report violations by any of the methods outlined in the Compliance Plan and understand that I may do so anonymously and without fear of reprisal. Employees are protected under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, from reprisal for whistleblowing on trafficking in persons violations.

Violations of this policy may result in disciplinary action up to, and including, termination of employment. Other disciplinary measures may include removal from the contract, reduction in benefits, or suspension and debarment from federal contracting. Trafficking acts committed abroad may also be subject to additional civil and criminal violations and may be punishable in the United States under the Military Extraterritorial Jurisdiction Act of 2000 (18 U.S.C. §§ 3261-3267) and 18 U.S.C. § 3271, Trafficking in Persons Offenses Committed by Persons Employed by or Accompanying the Federal Government Outside the United States.

As required by U.S. Government regulations, if the Company obtains information that an employee, agent, or subcontractor employee or agent has engaged in any of the forbidden acts listed in its Policy or Plan, the Company will immediately notify appropriate Government officials.

AGREEMENT AND ACKNOWLEDGMENT

I have read and understand the Company’s Combating Trafficking in Persons Policy. I agree to abide by this policy.

Agreed: _____ Date: _____

Printed Name: _____