

Combating Trafficking in Persons Compliance Plan

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Purpose

As outlined in the Federal Acquisition Regulation (FAR 52.222-50(h)) and Executive Order 13627 Strengthening Protections Against Trafficking in Persons in Federal Contracts, Applied Research Associates, Inc. (“ARA”) 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 this requirement and with ARA policies, this document represents ARA’s Combating Trafficking in Persons Compliance Plan (“Plan”).

1. Combating Trafficking in Persons – Recruitment Activities and Employee Awareness

1.1. Recruitment

ARA's Hiring Managers, Recruitment 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. ARA prohibits charging of recruitment fees, as defined in FAR 52.222-50, to employees and prospective employees.

1.2. Wage Plan and Housing

ARA ensures that employee wages meet host-country legal requirements or explains any variance. ARA 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.

In situations where ARA provides housing to employees, the housing will meet host-country housing and safety standards

1.3. Employee Awareness Program

ARA's Ethics Handbook is one of the primary tools utilized for employee awareness, and it outlines the requirement for all employees to comply with FAR 52.222-50, Combating Trafficking in Persons. Additionally, our Code of Ethics and Standards of Conduct Policy specifically identifies ARA's policy requiring employees to comply with FAR 52.222-50, and employees must sign a Policy Manual Acknowledgement which explains continued employment is contingent on their compliance with this and other ARA policies. Additionally, this Plan is posted on the ARA Intranet for continued awareness.

1.4. Process for Notifying and Reporting Violations

ARA is required to notify the Contracting Officer and the agency Inspector General immediately of any credible information received from any source that alleges an ARA employee, third party acting on behalf of ARA, subcontractor, or subcontractor employee has violated our FAR 52.222-50 compliance policy.

ARA employees or third-party doing work on behalf of ARA may also report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons. Employees are also instructed they may report violations by contacting the Human Trafficking Hotline at 1-888-373-7888, texting "BeFree" to 233733, or via email help@befree.org.

1.5. Periodic Reassessment of the Plan

ARA periodically reviews and assesses the internal controls assuring compliance with this Plan. Modification of controls and measures are implemented as required.

2. Trafficking in Persons Compliance Plan for Global Supply Chain Contracts

2.1. Introduction

ARA uses subcontractors extensively in the performance of its contracts. This includes domestic U.S. suppliers, including recruitment agencies, that perform work under contracts outside the United States and international subcontractors 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 in its supply chain, and to comply with contractual requirements to prevent human trafficking in connection with ARA's contracts, ARA employs a multifaceted approach to address the risk of human trafficking in its supply chain.

2.2. Flowdowns

Subcontracts for projects that trigger this requirement 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).
- FAR 52.222-56 Certification Regarding Trafficking in Persons Compliance Plan.
- 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

ARA includes a clause in its subcontracts requiring subcontractor compliance with applicable Federal, State and local laws, rules, Executive Orders and regulations, which necessarily include compliance with applicable laws or regulations pertaining to human rights and eradicating human trafficking and slavery.

2.4. Certifications

ARA obtains trafficking in persons certifications from subcontractors required to certify under FAR 52.222-50. Certificates are required before award of subcontracts and annually thereafter when performance extends beyond one year.

2.5. Obtaining and Reviewing Subcontractor Compliance Plans

ARA requires subcontractors to provide copies of their trafficking in persons compliance plan upon request of the Government contracting officer.

2.6. Registry as an Applied Research Associates, Inc. Supplier

All prospective subcontractors are required to submit Representations and Certifications 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. (FAR 52.209-5). Subcontractors are required to inform ARA if their status changes. If a supplier discloses a violation, the matter will be investigated, and appropriate action taken.

2.7. Supplier Code of Conduct

ARA maintains a Supplier Code of Conduct which is published on ARA's public website and referenced in our subcontracts and purchase orders. It includes the following.

While performing as Buyer's Subcontractor, Seller is also expected to certify of abiding by its own in-house code of ethics comparable to "ARA Code of Ethics and Standards of Conduct," or agrees to comply with said ARA code, <https://www.ara.com/wp-content/uploads/EthicsHandbook.pdf>.

If Seller has a good faith reason to believe that any violation of the Code of Ethics and Standards of Conduct, or the EEO/Affirmative Action policy cited above, has been committed by an employee(s) of either Buyer or Seller or anyone affiliated with Seller, Seller shall report such violation to Buyer by calling the Buyer's Ethics Helpline at 505-338-1500.

2.8. Monitoring of Contracts Performed Outside of the United States

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

2.9. Remedies

ARA takes appropriate action when subcontractors are found to engage in prohibited conduct, including the remedies specified in FAR 52.222.50. Where appropriate or required, ARA coordinates with the U.S. Government prior to the implementation of remedies against subcontractors.