



**DevTech Systems, Inc.’s Anti-Human Trafficking Policy & Compliance Plan**

**Purpose**

DevTech developed this Anti-Human Trafficking Policy & Compliance Plan (“Policy and Plan”) to comply with FAR 52.222-50(h) (“Combating Trafficking in Persons”) and USAID Standard Provision M20 for U.S. Nongovernmental Organizations (“Anti-Trafficking Provisions”). The purpose of this Policy and Plan is to ensure employees, agents and subcontractors are aware of prohibited conduct under DevTech’s policies as well as applicable anti-trafficking regulations and laws.

**Scope**

This Policy and Plan sets out DevTech’s baseline standards for anti-trafficking compliance and applies presumptively to all U.S. Government contracts, subcontracts, cooperative agreements, awards and subawards. This Plan may be modified to ensure that it is appropriate to the size and complexity of the contract or award and the nature and scope of the activities to be performed.

**Policy**

This Policy and Plan sets forth DevTech’s policy against trafficking in persons and in trafficking in persons compliance plan in compliance with FAR 52.222-50. This policy and plan are consistent with DevTech’s Code of Standards for Ethics and Business Conduct and DevTech’s core values of practicing respect for all people and conducting ourselves in an ethical, lawful manner.

DevTech is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor and all other trafficking-related activities. DevTech is committed to (a) fully complying with all applicable labor and employment laws, rules and regulations and (b) working to mitigate the risk of human trafficking in our business and supply chains.

The United States has long had a policy prohibiting government employees and contractor personnel from engaging in trafficking in persons activities, including severe forms of trafficking in persons. The FAR prohibits federal contractors and subcontractors from engaging in prohibited practices such as destroying, concealing, confiscating, or otherwise denying access by an employee to his or her identity or immigration documents; using misleading or fraudulent recruitment practices; charging employees recruitment fees; and providing or arranging housing that fails to meet the host country housing and safety standards. DevTech complies with and requires that its employees, subcontractors,



subcontractor employees and agents to comply with, FAR 52.222-50, which can be accessed at <http://www.acquisition.gov>.

DevTech employees, subcontractors, subcontractor employees and agents (a) shall fully comply with all applicable labor and employment laws, rules and regulations, and (b) shall not:

- (1) Engage in severe forms of trafficking in persons;
- (2) Procure commercial sex acts;
- (3) Use forced labor;
- (4) Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- (5) Use 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 employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work or use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- (6) Charge employees recruitment fees;
- (7) Fail to provide return transportation or pay for the cost of return transportation upon the end of employment: (i) 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 (for portions of contracts performed outside the United States); (ii) or for an employee who is not a United States national and who was brought into the United States for the purpose of working 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 (for portions of contracts performed inside the United States); except that:
  - (A) The requirements of this paragraph (7) shall not apply to an employee who is legally permitted to remain in the country of employment and who chooses to do so or exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation; or



(B) The requirements of this paragraph (7) are modified for a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons. The contractor shall provide return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. For example, the contractor shall not only offer return transportation to a witness at a time when the witness is still needed to testify. This paragraph does not apply when the exemptions in this paragraph (7) apply.

- (8) Provide or arrange housing that fails to meet the host country housing and safety standards or if required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work documents in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five (5) 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.
- (9) Use recruitment companies with untrained employees, that charge recruitment fees to the employees or potential employees, or do not ensure that wages meet applicable host-country legal requirements or explains any variance.
- (10) Allow agents and subcontractors at any tier and at any dollar value from engaging in trafficking in persons by monitoring, detecting, and terminating any agents, subcontracts, or subcontractor employees that have engaged in such activities.

### **Awareness Program**

DevTech distributes this Policy and Plan to employees performing work under a federal contract subject to FAR 52.222-50(h). DevTech prominently displays the Department of Defense's Combating Trafficking in Persons Hotline Poster, Fraud Hotline Poster, and Whistleblower Protection Hotline Poster, and the Department of Homeland Security's Fraud Hotline Poster, in each case as applicable, in the common work areas within its operating subsidiaries performing work under a federal contract.

### **Reporting Process**

Any DevTech employees or third-parties doing work on behalf of the Company are required to report information or knowledge of the actual or potential human trafficking violations to [HumanResources@devtechsys.com](mailto:HumanResources@devtechsys.com).



DevTech employees or third parties doing work on behalf of DevTech may also report violations by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

Retaliation against an individual who reports a violation is strictly prohibited.



## **Certification**

Annually after receiving an award, DevTech will certify to the Government:

- (1) It has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities and,
- (2) After having conducted due diligence, to the best of DevTech' knowledge and belief, neither it nor any of its agents, subcontractors or their agents are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, DevTech or its subcontractor has taken the appropriate remedial and referral actions.