

Millennium DPI Partners Anti-Trafficking Compliance Plan

Background and Purpose

Millennium DPI Partners condemns human trafficking in all forms and supports the United States Government's policies and legislation intended to prevent such activity. Millennium DPI Partner's Trafficking in Persons Compliance Plan ("Plan") is in accordance with the United States Government's policy prohibiting trafficking in persons and trafficking-related activities among their contractors, contractor employees, and their agents. This policy, outlined in paragraph (b) of the "Combating Trafficking in Persons" FAR clause 52.222-50, dated March 2, 2015 prohibits all Contractors, subcontractors, subcontractor employees, and their agents from –

- 1) Engaging in severe forms of trafficking in persons during the period of performance of the contract;
- 2) Procuring commercial sex acts during the period of performance of the contract;
- 3) Using forced labor in the performance of the 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) (i) 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 employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
(ii) Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- (6) Charging employees recruitment fees;
- (7) (i) Failing to provide return transportation or pay for the cost of return transportation upon the end of employment –
 - (A) 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); or
 - (B) 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 –
- (ii) The requirements of paragraphs (b)(7)(i) of this clause shall not apply to an employee who is –

- (A) Legally permitted to remain in the country of employment and who chooses to do so;
or
- (B) Exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation;
- (iii) The requirements of paragraph (b)(7)(i) of this clause 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 the 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 at paragraph (b)(7)(ii) of this clause apply.
- (8) Providing or arranging housing that fails to meet the host country housing and safety standards;
or
- (9) If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document 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 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.

Applicability

The FAR clause 52.222-50 applies to all United States Government contracts exceeded an estimated value of \$500,000 that are for non off-the-shelf supplies acquired outside the United States or for services performed outside the United States. Many of Millennium DPI Partners' contracts fall under these criteria. Therefore, the Millennium DPI Partners' Trafficking in Persons Compliance Plan, pursuant to FAR 52.222-50 applies to most of its employees, subcontractors, subcontractor employees and their agents. However, it may need to be adapted or modified for projects that are larger, more complex, or involve greater risk of trafficking activity. For all contracts and awards with an estimated value of \$500,000 or more, or involve activities outside the U.S., Project staff must examine each one individually to assess the risk of trafficking activity, based on factors such as the number of non-U.S. citizens to be employed and whether the contract or award will involve services or supplies susceptible to trafficking in persons. Project staff must adapt or modify the Plan as necessary 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.

Employee Awareness and Compliance

Millennium DPI has adopted a policy on Combating Trafficking in Persons ("Policy") that reflects the Anti-Trafficking Provisions' provisions prohibiting trafficking-related activities, describes the actions Millennium DPI may take against employees and agents who violate the Policy, and sets out the procedure

for reporting and investigating Policy violations. The Policy is also summarized in Millennium DPI's Code of Ethics and Conduct.

Millennium DPI Partners will provide relevant contents of the compliance plan to all employees and subcontractors and will ensure that the reading of the compliance plan is a prerequisite to the awarding of a contract for employment or subcontracting work. Millennium DPI will provide a training on the Ethics Code that will include its anti-trafficking provisions. This will be reviewed annually in addition to regular company wide emails directing employees to website links to our Anti-Trafficking policy. In addition, all employees and subcontractors will be encouraged to visit the Department of State's Office to Monitor and Combat Trafficking of Persons website at <http://www.state.gov/j/tip/> to learn more about anti-trafficking policies.

All subcontracts and all contracts with agents will include the paragraph (i) of the FAR clause 52.222-50, which notifies subcontracts that paragraph (h) of the clause also applies to them if they fulfill the criteria listed in the above Applicability section. For any subcontractor for which paragraph (h) applies, Millennium DPI Partners will ensure their submission of a compliance plan certification to the Contracting Officer prior to award of the subcontract and annually thereafter.

Employee and Subcontractor Reporting Procedure

Individuals under contract with Millennium DPI Partners or any of its subcontractors will be aware of their right to report any activity they suspect to be in violation of paragraph (b) of the FAR clause 52.222-50 without fear of personal repercussions. In the event of suspected violations of the policy, employees, anonymously or not, are welcome to contact—

- 1) Any supervisor or colleague working on the project
- 2) The Global Human Traffic Hotline at 1-844-888-FREE or help@befree.org
- 3) The Millennium DPI Partners Home Office at 434-293-9206 or bhannon@millenniumpartners.org

Recruitment and Wage Plan

Millennium DPI prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. For all parties entering into a contract with Millennium DPI, Millennium DPI will accurately disclose in a format and language accessible to the employee all key terms and conditions of employment, including wages and benefits, work location, living conditions, housing and associated costs (where provided or arranged by Millennium DPI), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work. In so doing, Millennium DPI Partners will ensure that all employees, subcontractors, subcontractor employees, and their agents are completely aware of the terms of their agreement. This will also include the content of applicable laws and regulations prohibiting trafficking in persons.

Millennium DPI prohibits destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents.

In accordance with FAR clause 52.222-50(h)(3)(iii), Millennium DPI Partners prohibits the use of recruitment companies without trained employees and does not permit the charging recruitment fees to any of its employees. Additionally, all employees and subcontractors entering into contract with Millennium DPI Partners will be paid wages that are in compliance with the host country's legal requirements. In the event of wages that do not meet these requirements, explanation of the variance will be provided to the individual or party in question as well as the appropriate USAID personnel.

Housing Plan

In accordance with FAR clause 52.222-50(h)(3)(iv), Millennium DPI Partners will ensure that in the event that it provides housing to employees, subcontractors, subcontractor employees, or their agents, that housing meets host country housing and safety standards.

Monitoring Procedure

Millennium DPI Partners will be involved in monitoring compliance with anti-trafficking policies throughout all stages of a project. Screening of prospective employees and subcontractors including inquiries into past performance recommendations will help prevent individuals and parties with previous violations of anti-trafficking policies from signing into contract with Millennium DPI Partners. Frequent communication with the Contracting Officer will ensure that the project is adhering to modifications in local labor and housing laws and complying satisfactorily with existing legislation. Chief of Parties, Monitoring and Evaluation specialists, and other administrative personnel will assist the Home Office in ensuring all employees, subcontractors, subcontractor employees, and their agents are in full compliance with the policy. Millennium DPI Partners will investigate all allegations of policy violations. As noted in the above Employee and Subcontractor Awareness and Compliance section, all personnel will be well aware of the policy and the repercussions that follow violations of it. Moreover, all employees are required to report any suspected trafficking related activity or violation of the policy.

Violations Procedure

In the event of a confirmed violation of the paragraph (b) policy of the FAR clause 52.222-50 by an employee, subcontractor, subcontractor employee, or other agent of Millennium DPI Partners, regardless of their labor category or salary, the individual(s) or party in question will be subject to appropriate penalties, which include but are not limited to—

- Immediate termination of an employee or subcontractor contract
- Immediate suspension of payment to an employee or subcontractor
- The removal of subcontractor employee or agent from the project

Millennium DPI strictly prohibits retaliation against any Millennium DPI employee who reports prohibited trafficking related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. Millennium DPI personnel who engage in any form of retaliation against those who report prohibited trafficking-related

activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment with Millennium DPI.

Government Cooperation Procedure

Pursuant to the requirements listed in FAR clause 52.222-50(g) (1), Millennium DPI Partners will cooperate fully with USAID concerning violations of the trafficking in persons policy. In the event of a violation or alleged violation of the policy in paragraph (b) of the FAR clause 52.222-50 by any of Millennium DPI Partners' employees, subcontractors, subcontractor employees or their agents, the Contracting Office of the corresponding country and the agency Inspector General will be immediately contacted. Additionally, the above offices will also be notified following any punitive action taken by Millennium DPI Partners against any employee, subcontractor, subcontractor employee, or their agent following a violation of the FAR clause 52.222-50(b). In both of these scenarios the information provided to the above offices will be sufficient to identify the nature and extent of the offense(s) or alleged offense(s) as well as the individuals or parties responsible for the conduct.

In all dealings with the United States Government, Millennium DPI Partners will comply fully and promptly to requests for documents from auditors and investigators, and will attempt to provide reasonable access to its domestic and international facilities should the United Government request such access to ascertain compliance with the Trafficking Victims Protection Act of 2000 (22 U.S.C. chapter 78), EO 13627, or other laws related to the trafficking of persons. In addition, Millennium DPI Partners will not hinder or prevent the ability of any of its employees, subcontractors, subcontractor employees, or their agents from cooperating fully with government personnel investigating alleged violations of the legislation listed above.