

## Human Trafficking Compliance Plan (US Regulation FAR 52.222-50)

### Purpose

The Perryman Company (“TPC”) is opposed to human trafficking in all forms and is supportive of the U.S. Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons (*hereafter referred to as “FAR 52.222-50”*) to combat human trafficking and will ensure the risk of such practices is mitigated within the business. FAR 52.222-50 prohibits U.S. Government contractors and their agents from engaging in any form of trafficking in persons, defined to mean 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, debt bondage or slavery and sex trafficking. To comply with FAR 52.222-50 all applicable businesses engaged in **applicable** contracts or subcontracts with the U.S. Government must develop a Compliance Plan (*as defined therein*) to ensure such mitigation of risks.

### Applicability

TPC’s Human Trafficking Compliance Plan applies to acquisition activities in support of **TPC contracts or subcontracts with the U.S. Government for supplies (other than commercially available off-the-shelf items) or services, acquired or performed outside the United States with an estimated value that exceeds US\$550,000**. The plan is to be adhered to by employees, contractors, suppliers, and agents of TPC, including subsidiaries and joint ventures controlled by TPC, performing work under a U.S. federal government contract.

### Appropriateness

A Compliance Plan must be appropriately tailored to the size and complexity of the U.S. Government contract, and to the nature and scope of the activities to be performed. TPC reserves the right to review and revise its Human Trafficking Compliance Plan should the nature and complexity of its contracts with the U.S. Government change.

## Human Trafficking Compliance Plan

**Training and Awareness:** TPC has adopted an internal policy (Anti-Human Trafficking Policy) to comply with anti-human trafficking laws and regulations in the United States and those territories in which TPC operates. Further, human trafficking awareness training is conducted for employees during the on-boarding process and on an as needed basis thereafter.

**Risk Assessment:** An overall risk assessment is conducted as part of TPC’s contractor/supplier onboarding process. If it is identified that a contractor/supplier falls within the requirements of FAR 52.222-50, then a risk assessment on the applicable contractor/supplier may be conducted.



**Recruitment, Wages and Housing:** TPC prohibits misleading or fraudulent recruiting practices during all recruitment activities. TPC will only use recruitment companies who do not charge recruitment fees to the employee and will review upon engagement recruitment companies' terms of business to ensure compliance. TPC will take measures to ensure employee wages meet applicable country legal requirements or will explain any variance. In the event that TPC or its contractors, suppliers or agents intend to provide or arrange housing in connection with performing work under a contract that meets the requirements, housing will meet host country housing and safety standards

**Contractors, Suppliers and Agents:** TPC requires contractors, suppliers and agents to comply with all applicable local, state and national government laws and regulations of the local region they are conducting operations in. TPC reserves the right to observe contractor premises for any violations of FAR 52.222-50 and to take appropriate action and remedies if a problem arises, and to terminate any contract should a report of violation be substantiated.

For applicable contracts, the requirement to adhere to FAR 52.222-50 is mandatory for all contractors, suppliers and agents of TPC and this requirement shall be flowed down to their sub-tier contractors, suppliers and agents who engage in business indirectly with TPC. The substance of FAR 52.222-50 shall be included in their applicable subcontracts and contracts with agents. Notwithstanding the foregoing, requirements for a Compliance Plan apply only to any portion of the subcontract that meets the same prime contractor thresholds.

**Reporting Violations:** Should employees or contractors, suppliers and agents be unsure as to whether a specific action would be a violation of FAR 52.222-50, they should consult TPC's leadership team. All employees or contractors, suppliers and agents are required to report information or knowledge of human trafficking internally. If the employee does not feel comfortable reporting this information internally, they should contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email [help@befree.org](mailto:help@befree.org). Retaliation against an individual who has reported a violation will not be tolerated.

**Posting:** TPC shall display FAR 52.222-50 Combating Trafficking in Persons posters including making available the phone number of the **Global Human Trafficking Hotline (U.S.) 1-844-888-FREE** and email address of [help@humantraffickinghotline.org](mailto:help@humantraffickinghotline.org). A copy of this Compliance Plan will be placed on TPC's external website and may be provided to contractors, suppliers and agents upon request.

**Certifications:** As applicable, TPC will certify to the US Government (or prime contractor) that:

- 1) it has implemented a compliance plan to prevent any prohibited activities identified in paragraph (b) of FAR 52.222-50 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 TPC's knowledge and belief, neither it nor any of its agents, subcontractors or their agents are engaged in any such prohibited activities; or if abuses related to any of the prohibited activities have been found, TPC or its subcontractor has taken the appropriate remedial and referral actions.

