

03 JULY 2018

ITC Combating Human Trafficking Policy and Compliance Plan

1. PURPOSE

To establish requirements for compliance with the United States Government’s policy prohibiting trafficking in persons and trafficking-related activities.

2. APPLICABILITY

All ITC Employees and all Agents, Suppliers and Subcontractors who represent or are authorized to act on behalf of ITC, or perform services or furnish supplies to ITC must comply with this policy and FAR 52.222-50 as applicable by contract.

3. INTRODUCTION

- 3.1.** ITC is vehemently against the acts of modern day slavery and human trafficking in any form. We are committed to ensuring that our Employees, Agents, Suppliers, and Subcontractors take the appropriate steps to mitigate the risk of modern day slavery and human trafficking from occurring in any aspect of our business and our supply chain. The U.S. Government has a zero-tolerance policy regarding any Government employees and contractor personnel and their agents engaging in any severe form of trafficking in persons. ITC stands behind and whole-heartedly supports this zero-tolerance policy.
- 3.2.** ITC Employees, Agents, Suppliers and Subcontractors are required to comply with the applicable provisions contained in the Federal Acquisition Regulation: Ending Trafficking in Persons (48 CFR Parts 1, 2, 9, 12, 22, 42, and 52) (the “FAR”), Defense Federal Acquisition Regulation Supplement: Further Implementation of Trafficking in Persons Policy, Defense Federal Acquisition Regulation Supplement: Requirements Relating to Supply Chain Risk (48 CFR Parts 203, 204, 212, 222, and 252; and 48 CFR Parts 202, 208, 212, 213, 214, 215, 233, 239, 244, and 252, respectively) (the “DFARS”), Executive Order 13627, “Strengthening Protections Against Trafficking in Persons in Federal Contracts,” (the “Executive Order”), and the anti-trafficking provisions of the 2013 National Defense Authorization Act, Public Law No. 112-239 (Jan. 2, 2013), codified in 22 U.S.C. Chapter 78 (the “Additional Regulations”), and the *ITC Combating Human Trafficking Policy and Compliance Plan* (“Policy”).
- 3.3.** The following introduces ITC’s Combating Human Trafficking Policy and Compliance Plan, as required by FAR 52.222-50(h), based upon the size and complexity of ITC’s contracts and the scope of ITC’s activities.
- 3.4.** Additional information about the awareness of trafficking in persons may be found at the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons website at www.state.gov/j/tip.

4. ITC'S COMBATING HUMAN TRAFFICKING POLICY

4.1. Defined Terms

"Agent" – Any individual, including a director, an officer, an employee, or an independent contractor, authorized to act on behalf of the organization.

"Commercial Sex Act" - Any sex act on account of which anything of value is given to or received by any person.

"Employee" - An employee of the Contractor directly engaged in the performance of work under the contract who has other than a minimal impact or involvement in contract performance.

"Human Trafficking" - The recruitment, harboring, transportation, transfer, or receipt of persons by means of abduction, fraud, coercion, deception, or abuse of power of a position of vulnerability for the purpose of exploitation.

"OCONUS" – The acronym for Outside the Continental United States; any country or place outside the contiguous 48 United States, to include Alaska, Hawaii and any U.S. territories.

"Subcontractor" – Any supplier, distributor, vendor, or firm that furnishes supplies or services to or for a prime contractor or another subcontractor.

"Severe Forms of Trafficking in Persons" - 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 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.

Terms not specifically defined herein shall have the meanings prescribed in FAR 52.222-50 Combating Trafficking in Persons

(http://farsite.hill.af.mil/reghtml/regs/far2afmcfars/fardfars/far/52_220.htm#P810_14962_1).

4.2. Policy Statement

ITC will not tolerate any modern slavery or human trafficking in any form within our business operations and is committed to mitigating the risk of modern day slavery and human trafficking in all aspects of our business and from within our supply chain. Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our business operations and supply chain.

ITC stands behind the U.S. Government's zero-tolerance policy and ITC Employees, Agents, Suppliers and Subcontractors are required to comply with all applicable provisions referenced in this Policy, FAR, DFARS, Executive Order 13627, and all Additional Regulations. To the extent the FAR, DFARS, Executive Order, the Additional Regulations, and this Policy differ in their requirements, the stricter requirements must be followed.

The U.S. Government has adopted a policy prohibiting trafficking in persons, including the trafficking-related activities listed in the clause. Pursuant to FAR 52.222-50, Combating Trafficking in Persons, ITC Employees, Agents, Suppliers, and Subcontractors shall not

1. Engage in severe forms of trafficking in persons during the period of performance of the contract;
2. Procure commercial sex acts during the period of performance of the contract;
3. Use forced labor in the performance of the contract;
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 in specified circumstances;
8. Provide or arrange housing that fails to meet the host country housing and safety standards; or
9. If required by law or contract, fail 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.

4.3. Implementation

- 4.3.1.** FAR 52.222-50 Combating Trafficking in Persons has the full force and effect of the law.
- 4.3.2.** Employees, Agents, Suppliers and Subcontractors are responsible for reading, understanding, and complying with this Policy and FAR 52.222-50 as required by contract.

- 4.3.3.** Employees, Agents, Suppliers and Subcontractors should consult with their management and/or the Human Resources Department if they are uncertain whether a specific action would be in violation of the FAR, DFARS, Executive Order, Additional Regulations and/or this Policy.
- 4.3.4.** Violations of this Policy or FAR 52.222-50 may result in disciplinary action, up to and including termination of employment, subcontract or other contractual agreement.
- 4.3.5.** Any credible information received from any source (including host country law enforcement) that an Employee, Agent, Supplier or Subcontractor has violated this Policy or FAR 52.222-50 must be reported immediately to ITC Management and/or the Human Resources Department. The President of ITC or the cognizant ITC Program Manager will inform the Contracting Officer and Inspector General of the allegation as required. The President of ITC will make any other disclosures or notifications required under FAR 52.222-50(d) and FAR 52.203-13.
- 4.3.6.** ITC Employees are required to report information or knowledge of actual or potential human trafficking violations to ITC Management. Employees may also report, in good faith, and have a responsibility to, without fear of retaliation and subject to protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, for reprisal for whistleblowing on trafficking in persons violations, any activity that violates the FAR, DFARS, the Executive Order, the Additional Regulations or this Policy to ITC Management, ITC Human Resources, the Department of Homeland Security's National Human Trafficking Resource Center Hotline 1-888-373-7888, or online to DHS at www.ice.gov/tips. Violations may also be reported to the Global Human Trafficking Hotline at 1-844-888-FREE and to its email address at help@befree.org.
- 4.3.7.** If a violation of FAR 52.222-50 is substantiated:

 1. Human Resources and ITC Management will ensure the appropriate disciplinary action is taken;
 2. The ITC President or cognizant ITC Program Manager will impose suitable remedies, which may include, but are not limited to, removal from contract, reduction in pay or benefits, and/or termination, on Employees, Agents, Suppliers or Subcontractors who fail to comply with FAR 52.222-50;
 3. The cognizant ITC Program Manager will inform the Contracting Officer of any actions taken against an Employee, Agent, Supplier or Subcontractor pursuant to FAR 52.222-50; and
 4. ITC will fully cooperate with any investigation initiated by the U.S. Government resulting from a violation of FAR 52.222-50.

4.3.8. ITC will maintain a Compliance Plan for combating trafficking in persons for any portion of a contract that is subject to FAR 52.222-50 that:

1. Is for supplies, other than commercially available off-the-shelf items, acquired outside the United States, or services to be performed outside the United States; and
2. Has an estimated value that exceeds \$500,000.

ITC's Compliance Plan shall be reviewed no less than annually to ensure it is appropriate—

1. To the size and complexity of ITC's current contracts; and
2. To the nature and scope of activities to be performed for the U.S. Government, including the number of non-U.S. personnel expected to perform work and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

ITC shall post its Compliance Plan no later than the commencement of contract performance, at the workplace (unless the work is to be performed in the field or not in a fixed location) and on ITC's website. ITC shall provide its Compliance Plan to the Contracting Officer upon request.

4.3.9. When necessary, ITC personnel performing in OCONUS locations will be housed in provisions which are, at a minimum, in compliance with the host country safety standards. If a Subcontractor or Supplier is used to procure housing, due diligence will be conducted to ensure compliance in all trafficking in persons applicable FAR and DFARS flow down clauses.

4.3.10. To the extent that ITC uses recruitment companies, only recruitment companies with trained employees shall be used and no recruitment fees may be charged to the Employee. In addition, all wages must meet applicable host-country legal requirements or ITC shall explain any variance.

4.4. Awareness Program

4.4.1. Employees

The *ITC Code of Business Ethics and Conduct* clearly prohibits human trafficking and ITC Management expects all Employees to conduct their actions and projects in an ethical and lawful manner. Employees are required to maintain the highest of moral standards while representing ITC. Failure to comply with the *ITC Code of Business Ethics and Conduct* or this Policy will result in disciplinary action, including but not limited to, the removal of the Employee from work on U.S. Government contracts, reduction of employment benefits, and/or termination of employment with ITC.

ITC requires all Employees to complete annual compliance training to ensure they have read and understand the *ITC Code of Business Ethics and Conduct* and agree to comply with the policies, procedures, and principles listed therein. Copies of the *ITC Code of Business Ethics and Conduct* and this Policy are posted on ITC's website and on our internal Employee Resources SharePoint site.

ITC requires all Employees to complete the *ITC Combating Human Trafficking Training* that includes ITC's Combating Human Trafficking Policy and Compliance Plan and the U.S. Department of Homeland Security's Human Trafficking Awareness training online at www.state.gov/j/tip/training/index.htm. New Employees must take this mandatory training within 30 days of hire and submit a signed Certificate of Completion to ITC Human Resources at humanresources@itcdefense.com. Failure to fulfill this employment obligation may result in removal from the contract or other disciplinary action.

Each year thereafter, ITC Employees will complete the annual training briefing referenced above and submit a signed Certificate of Completion to ITC Human Resources at humanresources@itcdefense.com. Failure to fulfill this employment obligation may result in removal from the contract or other disciplinary action.

ITC Employees are required to report information or knowledge of actual or potential human trafficking violations to ITC Management. Employees may also report, in good faith, and have a responsibility to, without fear of retaliation and subject to protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, for reprisal for whistleblowing on trafficking in persons violations, any activity that violates the FAR, DFARS, the Executive Order, the Additional Regulations or this Policy to ITC Management, ITC Human Resources, the Department of Homeland Security's National Human Trafficking Resource Center Hotline 1-888-373-7888, or online to DHS at www.ice.gov/tips. Violations may also be reported to the Global Human Trafficking Hotline at 1-844-888-FREE or to its email address at help@befree.org.

Should an Employee be unsure of what to do in a particular situation or desire guidance on any aspect of this Policy, they should consult ITC Management or Human Resources for guidance on the policies, procedures, or the law.

Reminders and tips will be included in the ITC Monthly Newsletter, to include any updates to this Policy or FAR 52.222-50.

As new Employees are hired, ITC will communicate all required training and policy information as part of the onboarding process.

4.4.2. Agents and Consultants

ITC sets clear expectations for all Agents and Consultants (also known as “Contingent Workers” or “Independent Contractors”). ITC strictly adheres to the “flow down” requirements of FAR 52.222-50 and includes the required language in the *ITC Purchase Order Terms and Conditions*. ITC’s standard consulting agreement and purchase order terms and conditions require Agents and Consultants to comply with all applicable laws and regulations, to include FAR 52.222-50.

The *ITC Code of Business Ethics and Conduct* clearly prohibits human trafficking and ITC Management expects all Consultants to conduct their actions and projects in an ethical and lawful manner. Consultants are required to maintain the highest of moral standards while representing ITC. Failure to comply with the *ITC Code of Business Ethics and Conduct* or this Policy will result in disciplinary action, including but not limited to, the removal of the Consultant from work on U.S. Government contracts and/or termination of all work with ITC. In addition, ITC may be due a refund for any portion of the contracted work that was involved in any prohibited activity listed above.

ITC requires all Consultants to complete annual compliance training to ensure they have read and understand the *ITC Code of Business Ethics and Conduct* and agree to comply with the policies, procedures, and principles listed therein. Copies of the *ITC Code of Business Ethics and Conduct* and this Policy are posted on ITC’s website.

ITC requires all Consultants who will be providing services and support OCONUS and whose consulting agreement or purchase order is subject to FAR 52.222-50, to complete the *ITC Combating Human Trafficking Training* that includes ITC’s Combating Human Trafficking Policy and Compliance Plan and the U.S. Department of Homeland Security’s Human Trafficking Awareness Training online at www.state.gov/j/tip/training/index.htm. New OCONUS Consultants must take this mandatory training within 30 days of hire or at the time of a determination to travel OCONUS for contract performance and submit a signed Certificate of Completion to the Consultant’s cognizant ITC Program Manager. Failure to fulfill this obligation may result in removal from the contract or other disciplinary action.

Each year thereafter, ITC Consultants performing work OCONUS will be required to complete the training briefing referenced above and submit a signed Certificate of Completion to the Consultant’s cognizant ITC Program Manager. Failure to fulfill this requirement may result in removal from the contract or other disciplinary action.

Agents and Consultants may report, in good faith, any suspected violation of the FAR 52.222-50 clause or the *ITC Combating Human Trafficking Policy and Compliance Plan* to the cognizant ITC Program Manager, the Department of Homeland Security's National Human Trafficking Resource Center Hotline 1-888-373-7999, or submit a tip online to DHS at www.ice.gov/tips. Violations may also be reported to the Global Human Trafficking Hotline at 1-844-888-FREE and to its email address at help@befree.org.

Should a Consultant be unsure of what to do in a particular situation or desire guidance on any aspect of this Policy, they should consult their cognizant ITC Program Manager for guidance on the policies, procedures, or the law.

Any updates to FAR 52.222-50 or ITC Policy are communicated in a timely manner via email and posted on ITC's website.

As new Agents and Consultants are identified, ITC will communicate all required training and policy information as part of the Agent and Consultant setup process.

4.4.3. Suppliers and Subcontractors

ITC sets clear expectations for all Suppliers and Subcontractors. ITC strictly adheres to the "flow down" requirements of FAR 52.222-50 and includes the required language in each applicable purchase order or subcontract agreement. In addition, ITC's subcontract agreement and the *ITC Purchase Order Terms and Conditions* require Suppliers and Subcontractors to comply with applicable laws and regulations.

Suppliers and Subcontractors who will provide contract support OCONUS are notified of their obligation to maintain compliance with the *ITC Combating Human Trafficking Policy and Compliance Plan*, FAR 52.222-50 Combating Trafficking in Persons, and any additional regulations or provisions contained therein through an Annual Expectations Letter.

Due to the nature and scope of the activities performed for ITC OCONUS, ITC requires all OCONUS Supplier and Subcontractor employees and consultants engaged in the performance of an ITC contract agreement with other than a minimal impact or involvement in support of a U.S. Government contract to complete the U.S. Department of Homeland Security's Human Trafficking Awareness Training online at www.state.gov/j/tip/training/index.htm or an equivalent Supplier- or Subcontractor-provided training. ITC reserves the right to review and approve any Supplier- or Subcontractor-provided equivalent training used to meet this contract obligation.

ITC will accept confirmation of an active registration in the System for Award Management (www.sam.gov) as proof of compliance with applicable FAR 52.222-50 requirements. ITC requires all applicable Suppliers and Subcontractors who are not registered and active in the System for Award Management to complete and sign Enclosure (1) to the Annual Expectations Letter within thirty (30) days to certify compliance with the requirements outlined in the Annual Expectations Letter and referenced policies. ITC reserves the right to request that Annual Certificates of Completion for the required training be provided to the cognizant ITC Program Manager for any Supplier or Subcontractor employees or consultants performing under an agreement with ITC.

Failure to comply with the aforementioned requirements is grounds for ITC to take any and all appropriate actions, up to and including immediate termination of the Subcontractor's or Supplier's contract with ITC. In addition, ITC may be due a refund for any portion of the contracted work that was involved in any prohibited activity listed above.

Subcontractors and Suppliers may report, in good faith, any suspected violation of the FAR 52.222-50 clause or the *ITC Combating Human Trafficking Policy and Compliance Plan* to the cognizant ITC Program Manager, the Department of Homeland Security's National Human Trafficking Resource Center Hotline 1-888-373-7999, or submit a tip online to DHS at www.ice.gov/tips. Violations may also be reported to the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org.

Any updates to FAR 52.222-50 or ITC Policy will be disclosed in a timely manner via email and posted on the ITC website. Any questions regarding ITC's Policy and actions to combat trafficking in persons may be directed to the cognizant Program Manager.

As new Suppliers and Subcontractors are identified, ITC will communicate all required training and policy information as part of the purchase order or subcontracting process.

5. PROCEDURES TO PREVENT AGENTS, CONSULTANTS, SUPPLIERS AND SUBCONTRACTORS FROM ENGAGING IN TRAFFICKING IN PERSONS AND TO MONITOR, DETECT, AND TERMINATE

ITC takes steps to verify, evaluate, and address risks of slavery and human trafficking in its supply chain. Before entering into a business relationship, the cognizant ITC Program Manager or ITC Management will perform a due diligence background search on the entity through available public records as well as conduct a fact-finding interview (relative to the location, nature and scope of the activities the entity will perform) to determine if there are any ethics violation “red flags”.

Agents, Consultants, Suppliers and Subcontractors shall be made aware of their contractual obligations and reporting requirements. All consulting agreements, purchase orders, subcontracts or other governing agreements will contain any mandatory “flow down” clauses, to include FAR 52.222-50 Combating Trafficking in Persons, to ensure compliance with this Policy and the requirements of U.S. Government prime contracts.

5.1. Employees

- 5.1.1.** Not less than annually, ITC requires all Agents and Consultants who meet ITC’s and the FAR 52.222-50 requirement threshold to certify they have:
1. Completed all required Ethics and Combating Human Trafficking training as outlined in this policy; and
 2. Reviewed and understand the *ITC Combating Human Trafficking Policy and Compliance Plan* to include ITC policies and practices prohibiting engagement in the trafficking of persons, the use of forced labor, or the procuring of commercial sex acts in the country or countries in which it conducts business.
- 5.1.2.** When ITC Management is present in international areas where Employees are performing work, the activities of the Employees will be monitored for potential trafficking problems or issues. In addition, ITC Management will speak with local Program Managers to determine if there may be any issues. If issues are suspected or found, the matter will be investigated and appropriate action taken.
- 5.1.3.** ITC will investigate evidence or allegations that Employees have violated human trafficking prohibitions and will take appropriate action when Employees are found to engage in prohibited conduct, including the remedies specified in FAR 52.222-50. Where appropriate or required, ITC will coordinate with the U.S. Government prior to the implementation of remedies against Employees.

5.2. Agents and Consultants

- 5.2.1.** Not less than annually, ITC requires all Agents and Consultants who meet ITC's and the FAR 52.222-50 requirement threshold to certify they have:
1. Completed all required Ethics and Combating Human Trafficking training as outlined in this policy;
 2. Reviewed and understand the *ITC Combating Human Trafficking Policy and Compliance Plan* to include ITC policies and practices prohibiting engagement in the trafficking of persons, the use of forced labor, or the procuring of commercial sex acts in the country or countries in which it conducts business;
 3. If applicable, implemented a compliance plan to prevent any prohibited activities identified at FAR 52.222-50 (b) and to monitor, detect, and terminate any agent or employee engaging in prohibited activities; and
 4. Conducted due diligence, either (a) to the best of its knowledge and belief, neither it nor any of its agents or employees is engaged in any such activities; or (b) if abuses relating to any of the prohibited activities identified in FAR 52.222-50(b) have been found, the Agent or Consultant has taken the appropriate remedial and referral actions.
- 5.2.2.** When ITC personnel are present in international areas where Agents or Consultants are performing work, the activities of the Agents or Consultants will be monitored for potential trafficking problems or issues. In addition, ITC Management will speak with local Program Managers to determine if there may be any issues. If issues are suspected or found, the matter will be investigated and appropriate action taken.
- 5.2.3.** ITC will investigate evidence or allegations that Agents or Consultants have violated human trafficking prohibitions and will take appropriate action when Agents or Consultants are found to engage in prohibited conduct, including the remedies specified in FAR 52.222-50. Where appropriate or required, ITC will coordinate with the U.S. Government prior to the implementation of remedies against Agents or Consultants.
- 5.2.4.** The record of an Agent or Consultant's compliance with human trafficking requirements will be considered in making future Agent and Consultant source selections. Agents or Consultants that have engaged in prohibited conduct may be excluded from eligibility of future awards.
- 5.2.5.** ITC will make training materials available to Agents and Consultants and provide other assistance upon request. Agents and Consultants needing assistance with developing compliance plans will be provided copies of the *ITC Combating Human Trafficking Policy and Compliance Plan* and the *ITC Code of Business Ethics and Conduct* as needed. The *ITC Combating Human Trafficking Training* is available in both English and Spanish languages.

5.3. Suppliers and Subcontractors

- 5.3.1.** Not less than annually, ITC requires all Suppliers and Subcontractors who meet ITC's and the FAR 52.222-50 requirement threshold to certify they have:
1. Reviewed and understand the *ITC Combating Human Trafficking Policy and Compliance Plan* to include ITC policies and practices prohibiting engagement in the trafficking of persons, the use of forced labor, or the procuring of commercial sex acts in the country or countries in which it conducts business;
 2. Complied with FAR 52.222-50 and the *ITC Combating Human Trafficking Policy and Compliance Plan* after receiving ITC's Annual Expectations Letter;
 3. If applicable, implemented a compliance plan to prevent any prohibited activities identified at FAR 52.222-50 (b) and to monitor, detect, and terminate any agent or employee engaging in prohibited activities. ITC reserves the right to request Supplier- or Subcontractor-provided equivalent training documentation and Supplier or Subcontractor agent or employee training certificates; and
 4. Conducted due diligence, either (a) to the best of its knowledge and belief, neither it nor any of its agents or employees is engaged in any such activities; or (b) if abuses relating to any of the prohibited activities identified in FAR 52.222-50(b) have been found, the Supplier or Subcontractor has taken the appropriate remedial actions and notified the cognizant ITC Program Manager of any violations, issues, concerns or questions.
- 5.3.2.** When ITC personnel are present in international areas where agents or employees of Suppliers or Subcontractors are performing work, the activities of the agents or employees will be monitored for potential trafficking problems or issues. In addition, ITC Management will speak with local Program Managers to determine if there may be any issues. If issues are suspected or found, the matter will be investigated and appropriate action taken.
- 5.3.3.** ITC will investigate evidence or allegations that Suppliers or Subcontractors have violated human trafficking prohibitions and will take appropriate action when Suppliers or Subcontractors are found to engage in prohibited conduct, including the remedies specified in FAR 52.222-50. Where appropriate or required, ITC will coordinate with the U.S. Government prior to the implementation of remedies against Suppliers or Subcontractors.
- 5.3.4.** ITC will periodically monitor the U.S. Government's System for Award Management (SAM) Exclusions database and other restricted parties lists and comply with applicable limitations on award to debarred, suspended, proposed for debarment, or otherwise restricted Suppliers or Subcontractors.
- 5.3.5.** The record of a Supplier or Subcontractor's compliance with human trafficking requirements will be considered in making future source selections. Suppliers and Subcontractors that have engaged in prohibited conduct may be excluded from eligibility of future awards.

5.3.6. ITC will make training materials available to Suppliers and Subcontractors and provide other assistance upon request. Suppliers or Subcontractors needing assistance with developing compliance plans will be provided copies of the *ITC Combating Human Trafficking Policy and Compliance Plan* and the *ITC Code of Business Ethics and Conduct* as needed. The *ITC Combating Human Trafficking Training* is available in both English and Spanish languages.

6. RESPONSIBILITIES

- 6.1.** The Human Resources Department will maintain ITC's primary compliance plan with all Employee compliance information. Information pertaining to Agents, Consultants, Suppliers and Subcontractors will be maintained on the same compliance spreadsheet and must be communicated by the cognizant ITC Program Manager. Human Resources will alert the cognizant ITC Program Manager of nearing recertification requirements.
- 6.2.** The Business Development Lead or cognizant ITC Program Manager will conduct a preliminary assessment of business opportunities that may require a compliance plan to determine whether the primary compliance plan is sufficient for the particular business opportunity or whether to request further assessment from ITC Management to determine whether the plan requires supplementation based on the following criteria:
1. The size and complexity of the contract or subcontract; and
 2. The nature and scope of the activities to be performed for the U.S. Government, including the number of non-United States citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.
- 6.3.** When the cognizant ITC Program Manager or President determines additional measures are required to address the risk of trafficking for a particular business opportunity, the ITC Program Manager shall prepare and provide to the President a supplement to describe any additional measures that should be undertaken to enhance the primary compliance plan.
- 6.4.** ITC will periodically monitor the U.S. Government's System for Award Management (SAM) Exclusions database and other restricted parties lists and comply with applicable limitations on award to debarred, suspended, proposed for debarment, or otherwise restricted Suppliers and Subcontractors.
- 6.5.** Annually after receiving an award, ITC will certify to the Government through the System for Award Management, and in writing as required, that;
1. It has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any Employee, Agent, Consultant, Supplier or Subcontractor engaging in prohibited activities and,
 2. After having conducted due diligence, to the best of ITC's knowledge and belief, neither it nor any of its Employees, Agents, Consultants, Suppliers or Subcontractors or their agents or employees are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, ITC or its Agent, Consultant, Subcontractor, or Supplier has taken the appropriate remedial and referral actions.

6.6. Not less than annually, ITC will review and assess this Compliance Plan and the internal controls assuring compliance with this Plan. Modification of this Plan, procedures and measures will be implemented in a timely manner as required.

7. DEVIATIONS

Any deviation from this policy requires the prior approval of the President or designee.

8. QUESTIONS

Questions regarding ITC's Policy and actions to combat trafficking in persons may be directed to humanresources@itcdefense.com or your cognizant ITC Program Manager.