



Procedure Number: **W-0102** Subject: **Anti-Trafficking Compliance Plan**
Date: 06/04/19 Revision: A (new address added)

Jackson Labs Technologies, Inc. condemns human trafficking in all forms and supports the United States Government’s policies and legislation intended to prevent such activity. Jackson Labs Technologies, Inc. Anti-Trafficking Compliance 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

A compliance plan is mandatory whenever Jackson Labs Technologies, Inc. is performing work on a covered contract. This plan shall serve as the compliance plan for all covered contracts unless modifications to the Plan are necessary due to the size and complexity of the contract or the nature and scope of the activities to be performed for the U.S. government, in which case a modified plan will be drafted specifically for that contract. This Plan also applies to all Jackson Labs Technologies, Inc. subcontractors and other supply chain partners when the covered contract is for supplies (other than commercially available off-the-shelf items) acquired outside the U.S. or services to be performed outside the U.S. that have an estimated value exceeding US\$500,000. When applicable, supply chain partners must adopt this Plan or certify in writing that they have in place a compliance plan satisfying the requirements of FAR 52.222-50(h), providing a copy upon request. In the event any covered contract has stricter provisions relating to human trafficking than those contained in this Plan, the stricter provisions must be followed.

Reporting Process

Employees, agents, subcontractors, suppliers and other business partners are required to report any conduct believed to be a violation of the Jackson Labs Technologies, Inc. Anti-Trafficking Compliance Plan and have been provided multiple means of doing so, including:

- Contacting Jackson Labs Technologies, Inc. via email (info@jackson-labs.com)
- Contacting Jackson Labs Technologies, Inc. via telephone (702-233-1334)
- Contacting The Global Human Trafficking Hotline at 1-844-888-FREE or through its email address at help@befree.org.
- Contacting The U.S. Defense Department reporting hotline at <http://ctip.defense.gov/>.



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Jackson Labs Technologies, Inc. will investigate allegations and take appropriate corrective action, if warranted. Employees, subcontractors, suppliers and other business partners are also advised that the failure to report actual or suspected improper conduct may be deemed a violation of the Jackson Labs Technologies, Inc. Anti-Trafficking Compliance Plan as permitted by applicable law. Jackson Labs Technologies, Inc. does not tolerate retaliation against any person for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Recruitment and Wage Plan

Jackson Labs Technologies, Inc. uses only internal recruiters or third-party recruitment companies that have trained employees, prohibit charging recruitment fees to the candidate, ensure that wages meet applicable host-country legal requirements or explain any variance, and otherwise observe the anti-trafficking requirements set forth in the Jackson Labs Technologies, Inc. Anti-Trafficking Compliance Plan.

Housing Plan

To the extent housing is being provided or arranged by Jackson Labs Technologies, Inc. or its supplier, Jackson Labs Technologies, Inc. requires that the housing meet host country housing and safety standards.

Procedures for Agents, Subcontractors, Suppliers and Other Business Partners

Jackson Labs Technologies, Inc. supply chain partners are required to comply with the Jackson Labs Technologies, Inc. Supplier Code of Conduct and the Jackson Labs Technologies, Inc. Anti-Trafficking Compliance Plan whether or not they are supporting a covered contract. If they are supporting a covered contract, they must additionally comply with this plan if applicable. The contractual arrangement between Jackson Labs Technologies, Inc. and each supply chain partner will incorporate all applicable FAR clauses and other "flowdown" provisions, including the substance of FAR 52.222-50 when required. The contractual arrangement will also include Jackson Labs Technologies, Inc. requirements designed to monitor, detect and address potential violations.

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 Jackson Labs Technologies, Inc., 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

Jackson Labs Technologies, Inc. strictly prohibits retaliation against any Jackson Labs Technologies, Inc. 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. Jackson Labs Technologies,



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Inc. personnel who engage in any form of retaliation against those who report prohibited trafficking-related or other violations of this policy are subject to disciplinary action, up to and including termination of employment with Jackson Labs Technologies, Inc.

Government Cooperation Procedure

Pursuant to the requirements listed in FAR clause 52.222-50(g)(1), Jackson Labs Technologies, Inc. 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 Jackson Labs Technologies, Inc. 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 Jackson Labs Technologies, Inc. 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, Jackson Labs Technologies, Inc. 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, Jackson Labs Technologies, Inc. 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.