



**Anti-Human  
Trafficking Policy and Compliance  
Plan - 2019**





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## Anti-Human Trafficking Policy

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This Anti-Human Trafficking Policy and Compliance Plan applies to all the employees of American Cybersystems, Inc. (ACS), MassGenics Incorporated, Analysts International Corporation, Hiregenics, Inc., Proficient Business Systems, Inc. (Probys), and Versogenics, Inc. (Comforcehealth) working on federal government contracts (collectively referred to as the “Company”).

The Company is opposed to human trafficking and forced labor in any form. We are committed to working to mitigate the risk of human trafficking and forced labor in all aspects of our business. The US 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, 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, peonage, debt bondage or slavery and sex trafficking.

### **Purpose**

The purpose is to set out the Company’s policies and procedures for: (1) making employees aware of the conduct prohibited under the Anti-Human Trafficking Policy (hereafter “Policy”) and the actions that may be taken against employees for violations; (2) employing fair recruitment, wage and housing practices; and (3) preventing prohibited trafficking activity by monitoring, detecting and terminating those who engage in such activities.

### **Applicability**

This Policy and the Compliance Plan (hereafter “Plan”) applies to employees, subcontractors, subcontractor employees and agents of the Company performing work under a federal contract subject to Federal Acquisition Regulation (hereafter “FAR”) 52.222-50 (Combating Trafficking in Persons) and/or Defense Federal Acquisition Regulation Supplement (hereafter “DFARS”) 252.203-7004 (Display of Hotline Posters), 252.222-7007 (Representation Regarding Combating Trafficking in Persons) and/or 252.225-7040 (Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States), in each case as applicable.

## Activities prohibited

Employees, subcontractors, subcontractor employees and Company agents shall not engage in any of the following human trafficking-related activities:

1. Engage in all forms (i.e., using force, fraud or coercion) of trafficking in persons during the period of performance of a contract;
2. Solicit commercial sex acts during the period of performance of a contract;
3. Use forced labor in the performance of a contract;
4. Destroy, conceal, confiscate, or otherwise deny access of an employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
5. Use misleading or fraudulent recruiting 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 costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
6. Use recruiters not in compliance with local labor laws of the country in which the recruiting takes place;
7. Charge employee recruitment fees;
8. Fail to provide return transportation or pay for the cost of return transportation upon the end of employment for an employee who was not a national of the country in which the work is taking place and who was brought into that country for the purposes of working on a U.S. Government contract, subcontract or portion(s) of contracts or subcontracts performed outside the United States;
9. Provide or arrange housing that fails to meet the host country housing and safety standards; or
10. If required by law or contract, fail to provide an employment contract, recruitment agreement or other required work document in writing 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.

## **Disciplinary Action**

The Company will take appropriate action against employees, subcontractors, subcontractor employees and agents that violate this Policy and Plan, which action may include, but is not limited to, the following, as applicable:

1. Removal of employees from the contract, or requiring the subcontractor to remove a subcontractor employee or employees from the contract;
2. Reduction in employee benefits;
3. Termination of employment;
4. Declining to exercise available options under the contract;
5. Termination of the contract for default or cause, in accordance with the termination clause of the contract, or requiring the subcontractor to terminate a contract; or
6. Termination of the business relationship with the subcontractor.

## **Anti-Human Trafficking Compliance Plan**

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### **Awareness and Training Program**

The Company distributes this Policy and Compliance Plan to employees performing work under a federal contract subject to FAR 52.222-50, DFAR 252.203-7004, 252.222-7007, and/or 252.225-7040. The Company requires that each such employee go through and certify prior to commencing work under the contract that they have read and understand the Policy and will report any violations of which they are aware. The Company also requires that each such employee complete the Human Trafficking Awareness Training located on the United States Department of State's website, at <https://www.state.gov/j/tip/training/index.htm> prior to commencing work. Upon completion of the awareness training, the employees must acknowledge that they have completed the Human Trafficking Awareness Training.

For those employees who will be operating in geographic areas and/or functions with heightened risk for human trafficking, the Company will provide awareness training at the time of onboarding and on an annual basis.

## Reporting

1. Employees should consult their Federal Program Director if they are uncertain whether a specific action would be in violation of the FARs, or the DFARs;
2. Credible information regarding a potential violation of the Policy, whether by an employee, agent, subcontractor, or subcontractor employee must be immediately reported to Federal Program Director, or through the Company's toll free hotline number at 1-888-585-3877 or [speakup.acsicorp.com](https://speakup.acsicorp.com).
3. Employees aware of potential human trafficking violations may, in addition, contact the U.S. State Department's Global Human Trafficking Hotline directly at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).
4. The Company does not tolerate retaliation or threats of retaliation against anyone who raises a concern under the Policy or who assists with an internal or governmental audit or investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, which could also include termination of employment.
5. All employees are required to comply with this Policy and report any violations of which they are aware, regardless of whether they receive training.

## Audit and Investigation

The Company and its employees shall cooperate with any Federal agency conducting an audit or investigation of potential anti-trafficking violations, including providing timely responses to Government investigators and providing reasonable access to facilities and staff.

## Recruitment and Wage Plan

To the extent the Company may use recruitment companies, only recruitment companies with trained employees may be used, no recruitment fees may be charged to the employee and all wages must meet applicable host-country legal requirements or explain any variance.

## Housing Plan

In the event the Company or any of its subcontractors intend to provide or arrange housing in connection with performing work under a federal contract subject to FAR 52.222-50(h), the Company, and if applicable, its subcontractor shall establish a housing plan for such work that ensures that the housing meets host-country housing and safety standards.

## Posting

This Policy and Plan shall be posted (i) at the workplaces in the business units performing work under a federal contract, and (ii) on ACS's website at <https://www.acsicorp.com/>.



## **Certification**

The Company will certify annually during performance of any covered contract that:

1. This Policy and Plan is currently in place;
2. To the best of the Company's knowledge and belief, neither the Company nor any of its team members (employees, subcontractors, and subcontractor employees) are engaged in any human trafficking-related activities; and
3. No abuses have been found to date; however, if any abuses are reported, the Company will take appropriate action(s) in response to the abuse(s).