



Enterprise Information Services, Inc. (EIS)
**Combating Trafficking in Persons
Compliance Plan**



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Version 1.0

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Revision History

Version	Date	Location	Change description
1.0	10/9/2019	Entirety	Initial version

Purpose

As outlined in the Federal Acquisition Regulation (FAR 52.222-50) and Executive Order 13627 Strengthening Protections Against Trafficking in Persons in Federal Contracts, Enterprise Information Services (EIS) is required to develop and maintain a compliance plan during the performance of contract(s) or subcontract(s) that is appropriate for the size and complexity of the contract or subcontract and the nature and scope of the activities performed, including the risk that the contract or subcontract will involve services or supplies susceptible to trafficking. This document represents EIS's compliance plan and must be provided to the contracting officer upon request. Additionally, relevant contents of the plan will be posted on our website.

1. Combating Trafficking in Persons – Recruitment Activities and Employee Awareness

Introduction

Our global policies, procedures, and practices reflect our strong commitment to good corporate citizenship. This commitment underlies the EIS Code of Ethics and Business Conduct. Respect for human rights is an important part of being a good corporate citizen. This commitment applies to all employees and departments, and others who represent or act for us.

EIS recruits globally the best qualified talent to support business mission, goals, and services. Employees, agents, subcontractors, and recruiters play a key role in preventing human trafficking and related activities. Human trafficking and related activities include 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.

To minimize the risk of human trafficking and to comply with contractual requirements regarding human trafficking and related activities, EIS employs a multifaceted approach to address the risk of human trafficking and related activities outlined below.

Applicability

The EIS compliance program applies to all EIS elements, employees, and others who represent or act for us. With respect to entities that EIS neither wholly owns nor controls, EIS will communicate an expectation that the entity will adopt this compliance program consistent with the EIS Code of Ethics and Business Conduct.

External Recruitment Agency Support

EIS Contracts and Human Resources will ensure all contracts with external recruitment agencies or firms include the following contract clauses, as applicable, to facilitate compliance with prime contract requirements regarding human trafficking, in addition to requiring such agencies or firms to adhere to all applicable local, state, and national government laws:

- FAR 52.222-50 *Combating Trafficking in Persons* (applies to all subcontracts and contracts with agents).

- DFARS 252.203-7004 *Display of Hotline Posters*, as appropriate (applies to subcontracts under Department of Defense prime contracts that exceed \$5 million except when the subcontract is for the acquisition of a commercial item).
- DFARS 252.225-7040 *Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States* (applies to subcontracts under Department of Defense prime contracts that require subcontractor personnel to be available to deploy with or otherwise provide support in the theater of operations to U.S. military forces deployed outside the United States in (1) contingency operations; (2) humanitarian or peacekeeping operations; or (3) other military operations or exercises designated by the Combatant Commander).

Recruitment

EIS's Hiring Managers, Recruitment team, and contracted recruitment agencies that support recruitment activities must adhere to all internal policies (domestic and international) and host-country recruitment standards to combat trafficking in persons and trafficking related activities. EIS prohibits charging of recruitment fees, as defined in FAR 52.222-50, to employees and prospective employees and prohibits the use of any recruiting firms unless the firm's employees have received training on combating trafficking related activities.

Wage Plan

If EIS uses host-country staff, EIS will ensure that employee wages meet host-country legal requirements or will explain any variance.

Housing Plan

Should EIS decide that housing or reimbursement for housing is necessary for the assignment, adherence to EIS internal policies along with host-country housing and safety standards is mandatory.

Employee Awareness Program

EIS's Corporate Policy is published on EIS's corporate website (GOEIS.com) and is one of the primary tools utilized for employee awareness. EIS requires all employees to comply with FAR 52.222-50, Combating Trafficking in Persons, and specifies that violations may result in disciplinary action, up to and including termination of employment. EIS's awareness program includes a communications plan to ensure ongoing awareness is provided (e.g., corporate policy statement, EIS Newsletter, and electronic worksite posters – see Appendix A).

Process for Reporting Violations

Any credible information received from any source (including host country law enforcement) that an employee, subcontractor, subcontractor employee, or agent has violated FAR 52.222-50 must be reported immediately to the EIS Compliance Officer (Mr. Scott Regel, Sregel@goesi.com, 703.752-5527). If the EIS Compliance Officer anticipates that the event may require reporting under FAR 52.222-50, he immediately shall notify: EIS Contracts and Human Resources. The corporate Compliance Officer, in consultation with EIS Contracts and Human Resources, as applicable, will inform the cognizant Contracting Officer of the allegation, and the EIS President will inform the cognizant Inspector General of the allegation. Employees may also report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons to EIS Human Resources, the

EIS Compliance Officer, and the Global Human Trafficking Hotline (1-844-888-FREE; help@befree.org). If a violation of FAR 52.222-50 is substantiated:

- EIS Human Resources, in consultation with the EIS Compliance Officer, will ensure that the appropriate disciplinary action is taken.
- EIS Contracts, in consultation with the EIS Compliance Officer, will impose suitable remedies, up to and including termination, on subcontractors, agents, and external recruitment agencies who fail to comply with FAR 52.222-50.
- The EIS Compliance Officer, in consultation with EIS Contracts, as applicable, will inform the Contracting Officer of any actions taken against an employee, a subcontractor, or a subcontractor employee pursuant to FAR 52.222-50.
- The EIS Compliance Officer will prepare a written draft report of the violation and investigation and provide it to EIS General Counsel for review. The EIS Compliance Officer will notify the EIS President of the matter being disclosed, as appropriate.
- Finally, the corporate Compliance Officer will submit the final report to the cognizant Contracting Officer, and the EIS President will submit the final report to the cognizant Inspector General. The final report will include any other related disclosures required under FAR 52.203-13.

Note: If there is a disagreement about whether the event in question constitutes a reportable violation or provides a reasonable basis for voluntary disclosure, the EIS President will make the final decision whether to submit the report to the government.

Obtaining and Reviewing Supplemental Business Area Compliance Plans

EIS Contracts, in consultation with EIS Human Resources, is responsible for identifying the need for supplementation of this primary compliance plan to address the risk of human trafficking for a particular business opportunity.

When a supplement is determined to be required, EIS Human Resources each shall prepare and provide to EIS Contracts a supplement describing any additional measures that will be undertaken to enhance the compliance plan for a particular business opportunity.

For purposes of the supplemental plan, the primary compliance plan template can be used with the inclusion of the necessary additional information in the recruitment, wage, housing, and training plan areas.

Periodic Reassessment of the Plan

EIS will periodically review and assess the internal controls assuring compliance with this Plan. Modification of controls and measures will be implemented as required.

2. Trafficking in Persons Compliance Plan for Subcontracts

Introduction

EIS uses subcontractors extensively in the performance of its contracts. This includes domestic U.S. suppliers, including recruitment agencies, that perform work under contracts outside the United

States and international subcontractors that perform work throughout the world. Subcontractors play a key role in preventing human trafficking and related activities. To minimize the risk of human trafficking in its supply chain, and to comply with contractual requirements to prevent human trafficking in connection with EIS's contracts, EIS employs a multifaceted approach to address the risk of human trafficking in its supply chain.

Monitoring of Government Databases

EIS reviews, as needed, the U.S. Government's System for Award Management (SAM) Exclusions database and other restricted parties lists and complies with applicable limitations on award to debarred, suspended, proposed for debarment, or otherwise restricted subcontractors.

Flowdowns

All subcontracts include mandatory flow down clauses necessary to ensure compliance with this Plan and the requirements of prime contracts. This includes the following:

- FAR 52.222-50 *Combating Trafficking in Persons* (applies to all subcontracts and contracts with agents).
- DFARS 252.203-7004 *Display of Hotline Posters* (applies to subcontracts under Department of Defense prime contracts that exceed \$5 million, except when the subcontract is for the acquisition of a commercial item).
- 252.225-7040 *Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States* (applies to subcontracts under Department of Defense prime contracts that require subcontractor personnel to be available to deploy with or otherwise provide support in the theater of operations to U.S. military forces deployed outside the United States in (1) contingency operations; (2) humanitarian or peacekeeping operations; or (3) other military operations or exercises designated by the Combatant Commander)).

Contractual Requirements for Compliance with Applicable Laws

EIS's subcontract terms and conditions require subcontractors to comply with applicable laws and regulations. A typical provision reads as follows:

SELLER, in the performance of this Contract, shall comply with all applicable local, state, and federal laws, orders, rules, regulations, and ordinances. SELLER shall procure all licenses/permits, pay all fees, and other required charges and shall comply with all applicable guidelines and directives of any local, state and/or federal governmental authority.

Certifications

EIS will obtain trafficking in persons certifications from subcontractors required to certify under FAR 52.222-50. Certificates will be required before award of subcontracts and annually thereafter when performance extends beyond one year.

Obtaining and Reviewing Supplier Compliance Plans

EIS will require subcontractors to provide copies of their trafficking in-persons compliance plan upon request of either the contracting officer or EIS. Plans may also be required when needed in conducting due diligence of supplier compliance.

Registry as an EIS Supplier

Prospective international subcontractors are required to disclose certain contractor integrity and anticorruption information prior to being eligible for receipt of subcontracts. Among the disclosures required is whether the subcontractor has been convicted of, indicted or otherwise charged by any governmental entity for the commission of among other things, violation of human trafficking or child labor laws. Subcontractors are required to inform EIS if their status changes. If a supplier discloses a violation, the matter will be investigated and appropriate action taken.

Monitoring of Contracts Performed Outside the United States

When EIS personnel are present in international areas where subcontractors are performing work, the activities of the subcontractors will be monitored for potential trafficking problem or issues. If issues are suspected or found, the matter will be investigated and appropriate action taken.

Monitoring Third Party Sources of Information

EIS monitors multiple sources of third-party information including international news sources. If adverse information concerning an EIS supplier is discovered, the matter will be investigated and appropriate action taken.

Investigations

EIS will investigate evidence or allegations that subcontractors have violated human trafficking prohibitions. Subcontractors are required by EIS's terms and conditions of purchase to *“provide reasonable cooperation to EIS in conducting any investigation regarding the nature and scope of any failure by [the subcontractor] or its personnel to comply with applicable local, state, and federal laws, orders, rules, regulations, and ordinances that may affect the performance of [the subcontractor's] obligations under this Contract.”*

EIS will make appropriate disclosures to the U.S. Government of violations by subcontractors and cooperate with any Government investigation.

Remedies

EIS will take appropriate action when subcontractors are found to engage in prohibited conduct, including the remedies specified in FAR 52.222.50. Where appropriate or required, EIS will coordinate with the U.S. Government prior to the implementation of remedies against subcontractors.

Eligibility for Future Contracts

The record of a subcontractor's compliance with human trafficking requirements will be considered in making future subcontractor source selections. Subcontractors that have engaged in prohibited conduct may be excluded from eligibility of future awards.

Training and Other Assistance

EIS will make training materials available to subcontractors and provide other assistance to suppliers upon request. Suppliers needing assistance with developing compliance plans will be provided copies of EIS's Compliance Plan and its Code of Ethics and Business Conduct as needed.

Periodic Reassessment of the Plan

EIS will periodically review this Plan. Additional or different controls and measures will be implemented as required.

3. Appendix A – Electronic Worksite Posters

HUMAN TRAFFICKING

WHAT YOU CAN DO ABOUT IT



LOOK

FOR SIGNS THAT SOMEONE
MAY BE TRAFFICKED

- Unable to leave their job
- Does not control their earnings
- Unable to move freely or is being watched or followed
- Is afraid to speak in the presence of others
- Shows signs of being assaulted or otherwise harmed (denial of food, water, sleep, medical care)
- Passports and other documents have been taken away
- Has been cheated into paying debt



REPORT

WHAT YOU SEE

- National Trafficking Hotline
1-888-373-7888
- Immigration and Customs Enforcement Hotline
1-866-347-2423
- www.dhs.gov/humantrafficking



BUY

PRODUCTS WITHOUT
TRAFFICKING IN THEIR
SUPPLY CHAINS



Cocoa



Electronics
(Conflict Minerals)



Coffee



Agriculture