



Combating Human Trafficking Policy

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Policy Owner: Chief Ethics and Compliance Officer

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I. Purpose

Trafficking in persons is a global problem and millions of men, women, and children around the world are trafficked due to the rising demand for cheap labor and prostitution. Blumont acknowledges that it works in environments that are at a high risk for trafficking in persons and is taking steps to prevent it from occurring in our own work and in any of our work with local partners. It is Blumont's policy to avoid, prevent and detect any trafficking in persons associated with the provision or procurement of supplies or services under any U.S. government contract, grant or cooperative agreement, as well as to promptly address any allegations received.

II. Definitions

"Trafficking in persons" shall mean the recruitment, transportation, transfer, harboring or receipt of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs. The recruitment, transportation, transfer, harboring, or receipt of an individual under the age of 18 for the purpose of exploitation is considered trafficking in persons, even if none of the means listed above (force, coercion, abduction, etc.) are involved. Therefore, minors in prostitution are considered trafficking victims; by definition they cannot have consented to be prostitutes.

This policy is consistent with the Government's policy prohibiting trafficking in persons and is intended to reflect the requirements stated under [Federal Acquisition Regulation \("FAR"\) Subpart 22.17](#) and associated provisions ("Trafficking Prohibitions") and related regulations governing grants and cooperative agreements at 2 CFR 175.

III. Requirements

3.1 Prohibited Conduct

Employees shall not engage in any acts that directly support or advance trafficking in persons, in the performance of any contract, grant or cooperative agreement anywhere in the world, whether as a prime contractor, prime recipient or subcontractor, sub-recipient, including:

(a) Engaging in sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform is less than 18 years of age;

(b) Recruiting, harboring, transporting, transferring, providing, or obtaining a person for involuntary or forced labor or services through the use of fraud, coercion or actual or threatened force;

- (c) Procuring commercial sex acts;
- (d) Destroying, concealing, confiscating or otherwise denying access by an employee to that employee's identity or immigration documents;
- (e) On its own or through recruiters, utilize misleading statements or fraudulent practices to recruit prospective employees, including materially misrepresenting terms and conditions of employment such as wages and fringe benefits, work location, living conditions, housing costs provided or arranged by Blumont / IRD, any significant costs to be incurred by the employee, or failing to disclose hazardous conditions of the work to be performed, if any;
- (f) Charging employees recruitment fees;
- (g) Failing to provide or pay for the cost of return transportation after end of assignment when legally required;
- (h) Providing or arranging housing that fails to meet the host country housing and safety standards.

IV. Contract-Specific Compliance Plan

For any part of a Blumont contract, grant or cooperative agreement that is performed outside of the United States and exceeds \$500,000.00, Blumont shall maintain a contract-specific plan to ensure compliance with this policy and Trafficking Prohibitions. The compliance plan shall be tailored to the size and complexity of the contract as well as to the nature and scope of activities to be performed for the Government under the contract. Chiefs of Party and/or Compliance Officers shall be responsible for making the compliance plan available to employees by posting it in the workplace(s). If posting is impractical, the compliance plan shall be provided to each affected worker in writing.

At a minimum, each award-specific plan must include:

- (a) An awareness program to inform Employees about the trafficking related prohibitions, the activities prohibited, and the action that will be taken against the employee for violations.
- (b) A reporting mechanism for employees to report, without fear of retaliation, suspected violations of this policy, as well as the Global Human Trafficking Hotline (1-844-888-FREE) and email address (help@befree.org).
- (c) A recruitment and wage plan that (i) only permits the use of recruiting companies with trained employees (ii) prohibits charging recruitment fees to employees, and (iii) ensures wages meet applicable host country legal requirements or explains any variance.
- (d) If Blumont or any subcontractor/sub-recipient intends to provide or arrange for housing, a housing plan to ensure the housing meets the minimum housing and safety standards of the country in which housing is provided; and

(e) Procedures to (i) prevent subcontractors/sub recipient, subcontractors/sub recipient employees, consultants, staffing firms or other agents acting on behalf of Blumont/IRD (collectively “Subcontractors”) at any tier and at any dollar value from engaging in trafficking in persons, including any of the prohibited conduct stated in this policy and (ii) monitor, detect and terminate (or take other appropriate action against) Subcontractors that have engaged in such activities.

(f) A copy of the award-specific plan shall be made available to the responsible Contracting/Agreement Officer upon request.

(g) If your contract, grant or cooperative agreements (or a sub-instrument) is over \$500,000, please contact the Assistant Vice President of Contracts & Grants to draft and approve your contract specific plan to ensure compliance with this Policy and the Trafficking Prohibitions.

V. Failure to Comply

Employees who violate this policy shall be subject to appropriate disciplinary action, which may include, but is not necessarily limited to, removal from the contract, reduction in benefits (as permitted under applicable law), or termination of employment.

VI. Applicability to Subcontractors

Subcontractors will be expected to comply with the requirements of this Policy, and those who violate this policy will be subject to appropriate action which may include, but is not necessarily limited to, removal from the contract or termination of agreement. Blumont shall also ensure that all applicable FAR, 2 CFR 175 and other Mandatory Provisions are flowed down to its Subcontractors.

VII. Reporting Obligation

Employees are required to promptly report if they become aware of circumstances that suggest that any Employee or Subcontractor has engaged in any prohibited conduct in the performance of a Blumont contract. You should report by calling or emailing the Blumont Ethics Hotline.

BLUMONT ETHICS HOTLINE

E-mail: hotline@blumont.org

Phone: 703-957-1500

Online Reporting Form: blumonthotline.com