

	Document Number	Page	Effective Date	Site	Document Owner	Revision
	CP-008	1 of 3	2019-09-19	CPT	Human Resource Department	B
Document Title	HUMAN TRAFFICKING POLICY AND COMPLIANCE PLAN					
This document is considered proprietary to Veterans Trading Company. Unauthorized use is prohibited without documented authorization. Printed documents are to be considered uncontrolled and for reference only. To access the most recent versions of this document please access the VTC's document control matrix.						

1. PURPOSE

1.1. The purpose of this document is to state the Veterans Trading Company (VTC) position and documented policy regarding combating human trafficking.

2. SCOPE

2.1. This Policy applies to all employees of Veterans Trading Company ("Company") and all subcontractors and agents, performing work subject to Federal Acquisition Regulation ("FAR") 52.222-50, Combating Trafficking in Persons.

3. RESPONSIBILITIES

- 3.1. Veterans Trading Company's President; Is ultimately responsible and accountable for the organization's compliance to regulatory and statutory requirements as specified by state, federal and industry legislation.
- 3.2. Veterans Trading Company's Vice President of Human Resources; Is the extended authority of the President of the Company and responsible and accountable to develop, implement and maintain the appropriate policies, procedures and/or work instructions to ensure compliance to regulatory and statutory requirements as specified by state, federal and industry legislation.
- 3.3. VTC Human Resource Manager; Is the direct appointee of the Vice President of Human Resources and responsible and accountable to have knowledge of regulatory and statutory requirements as specified by state, federal and industry legislation, this would include being well-informed with modification and changes to said legislation. It is also the responsibility of the Human Resource Manager to ensure all required personnel have be trained and have access to the implemented policies, procedures and/or work instructions.

4. REFERENCE DOCUMENTS

4.1. INTERNAL

QM-001 Veterans Trading Company's Quality Manual
 HM-001 Veterans Trading Company's Employee Handbook

4.2. External

AS9100 Quality Management Systems – Requirements for Aviation, Space, and Defense Organizations
 FAR 2005.87.2 Federal Acquisition Regulation
 FAR SUBPART 22.1705 Federal Acquisition Regulation - Combating Trafficking In Persons
 FAR 52.222-50 Federal Acquisition Regulation - Combating Trafficking In Persons

5. FORMS

None

6. ACRONYMS/DEFINITIONS

VTC Veterans Trading Company
 Company Veterans Trading Company
 FAR Federal Acquisition Regulation

7. PROCEDURE (POLICY STATEMENT)

7.1. Veterans Trading Company complies with the requirements of FAR 52.222-50, Combating Trafficking in Persons, which prohibits contractors of certain government work from engaging in human trafficking and the use of forced labor or the procurements of commercial sex acts during contract performance. For work performed subject to the FAR, the following will apply:

	Document Number	Page	Effective Date	Site	Document Owner	Revision
	CP-008	2 of 3	2019-09-19	CPT	Human Resource Department	B
Document Title	HUMAN TRAFFICKING POLICY AND COMPLIANCE PLAN					
This document is considered proprietary to Veterans Trading Company. Unauthorized use is prohibited without documented authorization. Printed documents are to be considered uncontrolled and for reference only. To access the most recent versions of this document please access the VTC's document control matrix.						

- 7.1.1. If applicable under the laws of the location where the work is to be performed, the Company will provide an employment contract or employee agreement in writing to employees performing the work, containing the wages they are to be paid while on the assignment, in the employee's native language prior to their departing from their country of origin. The Company will provide all employees assigned to Department of Defense contracts a copy of this Policy and plan prior to the commencement of their assignment. The Policy explains the consequences for violating the Policy, as well as mechanisms for reporting violations.
- 7.1.2. Employees will be required to confirm that they are aware of and understand each of these items prior to the commencement of their assignment.
- 7.1.3. All Company employees are required to promptly report any suspected human trafficking related activity to the Company's Human Resource Department by phone at 801-363-8387 or email at HR@vtcusa.com.
- 7.1.4. The Company will protect and interview all employees suspected of being victims of or witnesses to prohibited activities. This will occur prior to the employee returning to their country of origin if the employee is located outside their country of origin at the time of the incident being reported. The Company will not prevent or hinder employees from cooperating fully with government authorities.
- 7.1.5. In the event of any suspected human trafficking-related activity, the Company will notify, as necessary, the Inspector General of the applicable government agency, the official responsible for the suspension or debarment actions, and if necessary, law enforcement.
- 7.1.6. The Company strictly prohibits, confiscating, destroying, concealing or otherwise denying access to employee identity or immigration documents.
- 7.1.7. The Company strictly prohibits misleading or fraudulent recruiting practices during the recruitment of team members. Recruiters are required to provide accurate information to all team members in regard to the assignment they are being offered.
- 7.1.8. Recruiters are subject to corrective actions, up to and including termination, if it is determined they charged any employee a recruitment fee, or intentionally provided inaccurate information to an employee regarding assignment details, such as wages, living conditions, and/or work location.
- 7.1.9. On contracts in which the Company is to provide housing to employees, the provision of housing will be, at a minimum, in compliance with the host country's safety standards.
- 7.1.10. The Company will provide return transportation costs for employees who have finished employment outside that employee's nation of residence.
- 7.1.11. The Company will remedy all violations of this Policy of which the Company is made aware, promptly and in such a way as to correct the violation and ensure that preventative measures are in place to prevent future violations, including but not limited to termination of employment and contract suspension or termination for repeat violations.
- 7.1.12. Any agent, subcontractor or subcontractor employee that is determined to have engaged in human trafficking-related activities will be terminated immediately from providing work for the Company.
- 7.1.13. A copy of this Policy and Compliance Plan will be posted at the worksite of all U.S. Government contracts exceeding \$500,000 in which the Company has active employees assigned. A copy will also be posted on the Company website.
- 7.1.14. If requested, a copy will also be provided to the applicable contracting officer.
- 7.1.15. If there are any substantiated allegations of human trafficking, the Company will ensure they are included in the Federal Awardee Performance and Integrity Information System (FAPIS).

	Document Number	Page	Effective Date	Site	Document Owner	Revision
	CP-008	3 of 3	2019-09-19	CPT	Human Resource Department	B
Document Title	HUMAN TRAFFICKING POLICY AND COMPLIANCE PLAN					
This document is considered proprietary to Veterans Trading Company. Unauthorized use is prohibited without documented authorization. Printed documents are to be considered uncontrolled and for reference only. To access the most recent versions of this document please access the VTC's document control matrix.						

7.1.16. The Company will cooperate with all legal requirements regarding policy transparency (including, for example, any future anti-trafficking initiatives) that call for companies to disclose their efforts to ensure that their supply chains are free of forced labor and other human trafficking-related activities.

8. RECORD REQUIREMENTS

Record Identification	Record Description	Storage Location	Record Type	Access/Retrieval Requirements	Retention Time
Employee Name and Contract Date	Employment Contract	Specified File Location in VTC Secure SharePoint	Electronic	Executive Management and Human Resources	7 Years Minimum

9. REVISION HISTORY

Revision	Date	Name	Reason
A	2016-04-12	Earl Huff	Initial Release
B	2019-09-19	Earl Huff	Removed business classification LLC, Reviewed document structure to current format, added addition referencing documents.