



Anti-Human Trafficking Compliance Policy & Awareness Handout

Effective Date: 01 January 2024

How to Follow Mobile Accord's Anti-Human Trafficking Compliance Requirements

As a service provider to projects funded by U.S. Government (USG) funds, Mobile Accord, Inc., must comply with Federal government regulations specified in our contractual agreements on USG-funded projects. In order to comply with the USG's updated anti-trafficking regulations, codified at 48 C.F.R. §52.222-50, Mobile Accord, Inc. ("MAI"), MAI has developed an Anti-Human Trafficking Compliance Plan. This document sets forth MAI's compliance for USG-funded projects.

Additional awareness information about trafficking in persons may be found at the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons website at <http://www.state.gov/j/tip>.

Prohibited Actions for MAI Employees

Pursuant to the terms of the prime contract, specifically, FAR 52.222-50, Combating Trafficking in Persons, MAI's employees and agents, as well as its subcontractors and sub-awardees and their employees and agents, are forbidden to:

- Recruit, harbor, transport, provide, or obtain persons, through the use of force, fraud, and/or coercion, and subject any person to involuntary servitude; and/or procure commercial sex acts from any person;
- Procure any sex act in exchange for anything of value and/or of perceived value;
- Use forced labor in the performance of a contract, cooperative agreement, or sub-award;
- Deny any employee access to his/her identity or immigration documents;
- Use misleading or fraudulent practices during the recruitment of any employee(s) and/or the offer of employment;
- Use recruiters who violate US and or the applicable labor laws where the recruitment occurs;
- Charge employee(s) recruitment fees;
- Withhold or fail to provide and/or pay the cost for an employee's return transportation upon the end of his/her employment (for employees who are not local nationals of the host/cooperating country where the work occurs and who traveled to the host/cooperating country to work on a project contract, subcontract, cooperative agreement, or sub-award);
- Provide or arrange housing that fails to meet the host/cooperating country housing and safety standards (if MAI provides or arranges for the employee's housing); and/or
- Fail to provide an employment and/or recruitment agreement, or other required work documents in writing as required by applicable US or local law or the contract, cooperative agreement, or sub-award.

Any violation of the above could result in immediate termination.



Reporting of Violations

MAI employees are expected to report any credible information of violations of this policy.

MAI Employees:

- (1)** Shall immediately inform their supervisor or MAI's General Counsel if they become aware of credible information of human trafficking.
- (2)** May report suspected or actual human trafficking activities to legal@mobileaccord.com.

Under 10 U.S.C. §2408, MAI employees can be confident that they may comply with their responsibility to report suspected instances of human trafficking in good faith, without fear of retaliation, and subject to protection from reprisal for whistleblowing on trafficking in persons violations, or any activity that violates the contract clause or cooperative agreement standard provision.

Recruitment and Wage Plan

MAI commits that, as required by law and/or the project contract or agreement, an employee's work document (employment contract, recruitment offer, or other required work documents) shall be in a language the employee understands; and

As required by law and/or the project contract or agreement, an employee's work document(s) will include details such as a work/position description, wages, prohibition on charging recruitment fees, work location(s), living accommodation(s) and associated costs (if applicable), time off, roundtrip transportation arrangements (if applicable), grievance process, and the content of the applicable laws, regulations, and MAI's policies which prohibit the trafficking in persons and the use of forced labor.

Housing Plan

If housing is provided, it should be sanitary, with adequate living space for each employee. Employees living in the provided housing must be free to come and go at will. There should be easy access to a telephone or payphone. If employers are in the possession of employee's passports, immigration forms, or any form of identification, employees shall have the right to access these documents at all times.