



PLANATE

MANAGEMENT GROUP

Cornerstone for Service, Integrity, and Innovation

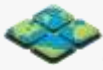
GLOBAL QUALITY AND COMPLIANCE GROUP

HUMAN TRAFFICKING COMPLIANCE PLAN (US REGULATION FAR 52.222-50)

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Author	Igor Gavrylov
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Reviewer/s	Jonathan Larson
Approver	Chris Decker

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INTERNAL INFORMATION



PROGRAM

GROUP | DIVISION

GLOBAL QUALITY AND COMPLIANCE GROUP

TITLE


HUMAN TRAFFICKING COMPLIANCE PLAN (US REGULATION FAR 52.222-50)

REVISION HISTORY

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1. OBJECTIVE

Planate Management Group LLC (Planate) is opposed to human trafficking in all forms and is supportive of the US Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons (hereafter referred to as FAR 52.222-50) to combat human trafficking and will ensure the risk of such practices is mitigated within the business.

FAR 52.222-50 prohibits US Government contractors and their agents from 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, debt bondage or slavery and sex trafficking. To comply with FAR 52.222-50 all applicable businesses engaged in contract with the US Government must develop a Compliance Plan to ensure such mitigation of risks.


2. APPLICABILITY

The Planate Human Trafficking Compliance Plan only applies within the business to contracts or subcontracts with the US Government for supplies (other than commercially available off-the-shelf items) or services, acquired or performed outside of the US with an estimated value that exceeds \$500,000.

The plan is to be adhered to by employees, suppliers, contractors, subcontractors, subcontractor employees and agents of Planate, including subsidiaries and joint ventures controlled by Planate, performing work under a US federal government contract.

3. PLAN CONSTRAINTS

According to FAR 52.222-50, a Compliance Plan must be appropriately tailored to the size and complexity of the US Government contract, and to the nature and scope of the activities to be performed. The Planate Human Trafficking Compliance Plan outlines compliance with FAR 52.222-50. Planate reserves the right to review and further develop its Human Trafficking Compliance Plan should the nature and complexity of its contracts with the US Government change.

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4. COMPLIANCE PLAN

4.1. Awareness Training

The Human Trafficking Awareness Training is conducted during the on-boarding process and on an as needed basis thereafter. Training materials are available to contractors should this be requested.

4.2. Risk Assessment

An overall risk assessment is conducted as part of the Planate Annual Risk Review process to assess the risk to the business in relation to FAR 52.222-50. If it is identified that a supplier falls within the requirements a risk assessment on the supplier may be conducted.


4.3. Recruitment / Wages / Housing

Planate strictly prohibits misleading or fraudulent recruiting practices during local and international location recruitment, 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 cost to be charged to the employee, and, if applicable, the hazardous nature of the work.

Planate will only use recruitment companies who comply with local labor laws of the country in which the recruiting takes place and do not charge recruitment fees to the employee and will review upon engagement recruitment companies' terms of business to ensure compliance.

Planate will take measures to ensure employee wages meet applicable host-country legal requirements or will explain any variance and permits the use of only those recruitment companies that provide proper training to employees and that have established procedures to ensure that wages meet applicable host country legal requirements.

In the event that Planate or its contractors, suppliers and agents intend to provide or arrange housing in connection with performing work under a contract that meets the requirements, housing will meet host country housing and safety standards.

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4.4. Procedure for contractors, suppliers and agents

The requirement to adhere to FAR 52.222-50 is mandatory to all contractors, suppliers and agents Planate engages with. This requirement is to be flowed down to all sub-tier contractors, suppliers and agents who engage in business indirectly with Planate. The substance of FAR 52.222-50 will be included in subcontracts and in contracts with agents. However, requirements for a Compliance Plan apply only to any portion of the subcontract that meets the same prime contractor thresholds. Contractors, suppliers and agents with a Compliance Plan in place must submit certification upon award of contract and on an annual basis thereafter.

Planate requires contractors, suppliers and agents to comply with all applicable local, state and national government laws and regulations of the local region they are conducting operations in. Upon request, information will be made available to all contractors, suppliers and agents on combating human trafficking including copies of this plan and internal training materials. If in the vicinity, Planate employees have the right to observe contractor premises for any violations of FAR 52.222-50.

Planate reserves the right to take appropriate action and remedies/ referrals if a problem arises, and to terminate any contract should a report of violation be substantiated.


4.5. Process for Reporting violations

Should employees or contractors, suppliers and agents be unsure as to whether a specific action would be a violation of FAR 52.222-50, they should consult any member of Planate’s Management Team.

All employees or contractors, suppliers and agents are required to report information or knowledge of human trafficking internally to a member of the Management Team in the first instance. If the employee does not feel comfortable reporting this information internally, they are able to contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email help@befree.org. Retaliation against an individual who has reported a violation will not be tolerated.

4.6. Display of information

Planate prominently displays, and promulgates via electronic means, FAR 52.222-50 Combating Trafficking in Persons posters including making available the phone number of the Global

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Human Trafficking Hotline (US) 1-844-888-FREE and email address of help@humantraffickinghotline.org should any violations need to be reported.

A copy of this plan will be displayed on Planate’s external site www.planate.net and provided to contractors, suppliers and agents if deemed necessary.

4.7. Certification

If applicable, after receiving an award and annually thereafter Planate will certify that it has a Compliance Plan in place, has conducted due diligence and has acted on any violations found. Certification for contractors, suppliers and agents that meet the threshold will also be requested at this time.

4.8. Further Information

All employees and contractors are encouraged to come forward to discuss the topic of Human Trafficking, or a perceived or actual violation, at any time. For further information not covered in this plan please contact a member of Planate’s Management Team.