



Overseas Strategic Consulting, Ltd.'s

Combating Trafficking in Persons (“Anti-Trafficking”) Compliance Plan

Overseas Strategic Consulting, Ltd. (OSC) fully supports U.S. and world-wide initiatives to combat trafficking in persons. Trafficking in persons is an internationally recognized violation of human rights and is incompatible with the core values of OSC and those of our clients. Trafficking in persons violates laws applicable to all OSC operations. OSC has a zero-tolerance policy regarding trafficking in persons.

OSC has developed its Combating Trafficking in Persons (“Anti-Trafficking”) Compliance Plan in accordance with U.S. Government regulations as set out in FAR Subparts 22.17, 52.222-50 (h), and 52.222-56, and USAID’s Mandatory Provision M15. Trafficking in Persons (April 2016). These regulations/provisions require implementation of a Compliance Plan in instances where supplies, other than commercially available off-the-shelf items, are acquired outside of the United States, or services are to be performed outside of the United States; and where such supplies or services have an estimated value that exceeds \$500,000.

OSC’s leadership understands the importance of anti-trafficking and anti-corruption initiatives and devotes sufficient resources to ensure compliance. Key elements of OSC’s compliance program include written compliance standards and procedures, ongoing employee training, regular monitoring and evaluation of the effectiveness of the Compliance Plan, a reporting process for complaints and concerns, corrective disciplinary actions for noncompliance, and review and remediation of problems.

OSC’s Anti-Trafficking Compliance Plan has four components: (1) *policies and procedures* – to define OSC’s intentions and establish norms and values; (2) *awareness and prevention* – to describe the actions OSC will take to ensure that OSC’s zero tolerance policy regarding trafficking in persons is known, and specify the procedures to prevent employees, consultants, subcontractors, sub-awardees, grantees, suppliers, and vendors (“Implementing Partners”), at any tier and at any dollar value, from engaging in trafficking in persons; (3) *reporting* – to detail the process for employees to report, without fear of retaliation, activity inconsistency with the policy prohibiting trafficking in persons; (4) *response and remedies* – to specify the actions that will be taken if any violations are suspected, reported, or occur.

Component 1: Policies and Procedures

Code of Conduct, Policies, and Procedures. OSC’s corporate policies and procedures foster a climate of ethical behavior. OSC Code of Conduct sets forth the principal ethical and professional standards that will govern the performance of an OSC employee or OSC consultant. OSC employees will at all times adhere the OSC code of Conduct and exemplify the professional excellence, good judgement, and uncompromised integrity set forth therein.

Anti-Trafficking Policy. OSC’s Anti-Trafficking Policy on Combatting Trafficking in Persons identifies the company’s zero tolerance of trafficking and recognizes prohibited activities as described in FAR Subparts 22.17, 52.222-50, and 52.222-56, and USAID’s Mandatory Provision M15. Trafficking in Persons (April 2016).

Anti-Trafficking Compliance Plan. OSC Anti-Trafficking Plan was developed in accordance with U.S. Government regulations as set out in FAR Subparts 22.17, 52.222-50 (h), and 52.222-56, and USAID’s Mandatory Provision M15. Trafficking in Persons (April 2016). OSC’s Anti-Trafficking Plan is posted



OSC's website (<http://www.oscltd.com/wp-content/uploads/2016/10/OSC-Anti-Trafficking-Plan-and-Policy.pdf>).

Recruitment and Wage Plan. OSC Recruitment and Wage Plan only permits the use of recruitment companies with trained employees, prohibits charging recruitment fee to the employee, and ensures that wages meet applicable host-country legal requirements.

Housing Plan. OSC Housing Plan ensures that employee housing meets host-country housing and safety standards.

Component 2: Awareness and Prevention

While OSC's awareness and prevention measures may vary from award to award depending on the size of the award and the perceived risks, OSC will take all reasonable and appropriate measures to comply with the letter and spirit of applicable U.S. Government regulations.

Risk Assessment. OSC's risk assessment includes evaluations of all Employees, Consultants, and Implementing Partners regarding the possibility of violations and then tailors compliance measures to address the risk of the possible violations. For projects believed to be a high risk, additional vetting of Employees, Consultants, and Implementing Partners may occur. Suspicion of possible violations will be promptly reported to the Executive Vice President and investigated, remedied, and if required, reported to appropriate government officials.

Awareness. Raising awareness of trafficking in terms of *what* it encompasses, *how* it is done, and *why* it is done is a critical first step in preventing the occurrence of trafficking. Accordingly, OSC takes actions to publicize its trafficking prohibitions and zero tolerance policy through its robust "Awareness Program" and "Training Program."

Awareness Program. To ensure that OSC employees and consultants are informed of the specific anti-trafficking prohibitions, OSC requires that all employees and consultants upon hire or engagement read and acknowledge OSC's Anti-Trafficking Policy. OSC will obtain their signed acknowledgement of receipt. Other actions to establish and publicize the company prohibitions include, for instance, strategic placement of signage throughout OSC offices; publishing OSC's Anti-Trafficking Plan on OSC's website and complete OSC's Anti-Trafficking Acknowledgement.

OSC will also seek to ensure that Implementing Partners to which the regulations apply are made aware of OSC's prohibitions, and if applicable, obtain copies of their Compliance Plans. Such plans must meet the minimum requirements in the Anti-Trafficking Provisions that are appropriate to the size and complexity of their agreements with OSC. To the extent that it is deemed appropriate, OSC will extend its awareness program to its award recipients that receive federal funds of \$500,000 or more and will review their Compliance Plans and share best practices in raising awareness.

Training Program. OSC's training program is an important component of OSC's trafficking prevention efforts. OSC will determine what constitutes a viable training program on a case-by-case basis and will determine the most feasible manner of delivering such training. Methodologies may include for instance, providing written materials, videos, online training, or by other means that are suitable and feasible in given situations.



OSC will also seek to build the capacity of Implementing Partners to which the regulations apply. To the extent that is deemed necessary, OSC will share its templates, best practices, and lessons learned.

Monitoring and Audits. During the hiring of employees and consultants, and contracting of Implementing Partners, and after their engagement, OSC assesses the ongoing risks of anti-trafficking and compliance violations. OSC will conduct enhanced monitoring of employees, consultants, and Implementing Partners that may be susceptible to trafficking and/or forced labor.

Audits will be performed based on known or suspected risk factors. OSC will fully cooperate with government and enforcement agencies during audits and investigations on anti-trafficking compliance.

Component 3: Reporting

All OSC employees, consultants, and Implementing Partners are obligated to report known or suspected violations of OSC's Anti-Trafficking Policy. If an employee or consultant fails to report a suspected violation, her or she could be subject to disciplinary action, up to and including termination. If an Implementing Partner fails to report a suspected violation, they could be subject to disciplinary action, up to and including termination of contractual relations.

Internal Reporting Requirements and Procedure. Known or suspected violations of OSC's Anti-Trafficking Policy should be reported via email at: osc@oscltd.com or via phone at: +1 215 735 0500. In addition, reports may be made to any OSC supervisor. OSC's Executive Vice President serves as OSC's Ethics Officer and ensures that instances of improper conduct will be investigated and resolved. Employees, consultants, and Implementing Partners may in good faith, report, without fear of retaliation and protection under applicable federal laws rules and regulation for whistleblowing on Anti-Trafficking Policy violations. Employees, consultants, and Implementing Partners should contact the Executive Vice President, or any OSC supervisor to report violations or irregularities.

All reports of suspected ethics violations will be investigated. OSC will notify the funding agency immediately and take any necessary remedial actions. All confirmed violations will be disclosed to the relevant enforcement authorities.

Confirmed violations of OSC's Code of Conduct or OSC's Anti-Trafficking Policy by employees or consultants may result in disciplinary actions, including, but not limited to, removal from the contract, reduction in benefits, or termination of employment.

Confirmed violations by Implementing Partners will result in remedial actions, including termination of contractual relations and assurance that funding agency directed payments for services or supplies will be withheld by OSC.

External Reporting Information. OSC personnel and Implementing Partners' personnel who believe they or others have been subjected to prohibited trafficking-related activities may report the activity to OSC as detailed above, or may contact Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.



Component 4: Response and Remedies

If OSC receives a report from an employee or other source alleging prohibited trafficking-related activity or other violations of OSC's Anti-Trafficking Policy, OSC's senior leadership will review the information to determine if it is credible and if so, take appropriate referral actions. OSC will cooperate fully with any U.S. Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to documents requested, and providing reasonable access to OSC facilities and staff. OSC's senior leadership will help ensure the appropriate response to trafficking allegations. The range of such responses may include, but not be limited to, for instance the following:

Human Resources Response. OSC's senior leadership will review cases involving staff at HQ or in the field to ascertain whether personnel policies and/or Anti-Trafficking policies have been complied with. In cases where violations have occurred, OSC senior leadership will recommend appropriate actions up to and including staff terminations.

Finance and Contract Response. Based on the recommendation of OSC's senior leadership, OSC's finance and contract staff will take the appropriate actions, which may include withholding payments or terminating engagement.

Compliance and Legal Response. OSC will notify the funding agency immediately and take any necessary remedial actions. All confirmed violations will be disclosed to relevant enforcement authorities.

Remediation. Where violations are uncovered through an internal investigation, third party audit, or otherwise, OSC will take the appropriate remedial and referral actions, and additional preventative measures shall be implemented to reduce the risk of reoccurrence.



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OSC’s Anti-Trafficking Policy identifies prohibited activities as set out in FAR Subparts 22.17, 52.222-50, and 52.222-56, and USAID’s Mandatory Provision M15. Trafficking in Persons (April 2016).

All Employees, Consultants, subcontractors, sub-awardees, grantees, suppliers, and vendors (“Implementing Partners”) must familiarize themselves with this policy and with their individual responsibilities to support these core values and ethical standards.

OSC prohibits trafficking in persons, including trafficking-related activities, at any tier and at any dollar value. OSC Employees, Consultants, and Implementing Partners shall not:

- Engage in severe forms of trafficking in persons, including but not limited to:
 - (1) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
 - (2) 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, peonage, debt bondage, or slavery.
- Procure commercial sex acts
- Use forced labor, including but not limited to, knowingly providing or obtaining labor or services of a person:
 - (1) By threats of serious harm to, or physical restraint against, that person or another person;
 - (2) By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
 - (3) By means of the abuse or threatened abuse of law or the legal process.
- Engage in debt bondage, defined as the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined
- Engage in involuntary servitude, defined as:
 - (1) Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or
 - (2) The abuse or threatened abuse of the legal process.



- Destroy, conceal, confiscate or otherwise deny access by and employee to the employee’s identity or immigration documents, such as passport or drivers’ license, regardless of issuing authority
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment
- Use recruiters that do not comply with local labor laws
- Charge employees recruitment fees
- Fail to provide return transportation or refuse to pay for the cost of return transportation upon the end of employment
- Provide or arrange housing that fails to meet the host country housing and safety standard
- Fail to provide an employment contract, recruitment agreement, or other required work document in writing, if required by law or contract

This prohibited conduct may never be permitted in the performance of OSC contracts or subcontracts.

Any employee with knowledge that such conduct may be occurring in the performance of an OSC contract, directly or through an OSC subcontractor at any level, must immediately report all available information via email at: osc@oscltd.com or via phone at: +1 215 735 0500 to the Executive Vice President, or to any OSC supervisor.

OSC employees who believe they or others have been subjected to prohibited trafficking-related activities may report the activity to OSC as detailed above, or may contact Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

Failure to report known or suspected violations of this policy will result in disciplinary action, up to and including termination.

Acknowledgement of Anti-Trafficking Policy

I, _____, have reviewed OSC’s Anti-Trafficking Policy.

I acknowledge that OSC, its Employees, Consultants, and Implementing Partners may not engage in or support trafficking in persons, including trafficking-related activities. I understand that I have an obligation to immediately report directly to OSC or to the Global Human Trafficking Hotline any conduct that appears to be a violation of this policy.

I understand that my failure to comply with this policy, including its reporting requirements, will subject me to disciplinary action, up to and including termination.

I understand that contracts may have additional country-specific requirements, depending on the place of performance and I will comply with these specific restrictions.

I agree to comply with the OSC Anti-Trafficking Policy and acknowledge my responsibilities under this policy.

Signature _____

Printed Name _____

Date _____