

Anti-Trafficking in Persons Compliance Plan

All Catholic Relief Services (“CRS”) employees must comply with CRS’ Policy on Safeguarding (the “Policy”), which prohibits trafficking in persons.

The United States Government (the “USG”) has also adopted a policy prohibiting trafficking in persons and enacted related rules for organizations performing certain USG contracts, grants and cooperative agreements. The USG imposes severe penalties for violations of these rules, which could result in the discharge of employees, subcontractors or subrecipients and a limitation or prohibition of CRS from doing business with the USG. In accordance with these USG rules, CRS has adopted this Anti-Trafficking in Persons Compliance Plan (the “Plan”).

I. APPLICABILITY

This Plan applies to any:

- (1) CRS contract with the USG requiring supplies acquired outside the United States (other than commercial off the shelf items) or services performed outside the United States which have an expected value exceeding \$500,000 (“Covered Government Contract”);
- (2) CRS assistance award (grant or cooperative agreement) from the USG that has an estimated value exceeding \$500,000 (“Covered USG Award”) and
- (3) CRS employee or other person supporting a Covered Government Contract or Covered USG Award (“Personnel”).

In this Plan, the term “*Covered Government Agreement*” collectively refers to Covered Government Contracts and Covered USG Awards.

II. PLAN ELEMENTS

A. Awareness

The USG’s policy prohibiting trafficking in persons is described in Federal Acquisition Regulation (“FAR”) 52.222-50, 2 CFR 175 and USAID Mandatory Standard Provisions for U.S. Nongovernmental Organizations, Section M20. The following summary has been excerpted from these requirements.

In the performance of USG contracts, grants or cooperative agreements, CRS, its employees, subrecipients or contractors, labor recruiters, brokers or other agents, at any tier, or their employees, labor recruiters, brokers or other agents must not:

- (1) engage in “severe forms of trafficking in persons”, which is defined as
 - (i) 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
 - (ii) 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.

- (2) procure commercial sex acts during the period of performance of the contract, grant or cooperative agreement;
- (3) use forced labor in the performance of the contract, grant or cooperative agreement;
- (4) destroy, conceal, confiscate or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses;
- (5) use misleading or fraudulent practices during the recruitment of potential employees or offering of employment, including:
 - (i) failing to disclose basic information in a format and language understood by the employee or potential employee, or making material misrepresentations during the recruitment of employees or potential employees regarding the key terms and conditions of employment or
 - (ii) using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- (6) charge employees or potential employees recruitment fees, as defined in FAR 52.222-50(a);
- (7) fail to provide return transportation or pay for the cost of return transportation upon the end of employment for certain individuals and in certain circumstances;
- (8) provide or arrange housing that fails to meet the host country housing and safety standards; or
- (9) if required by local law or contract, fail to provide an employment contract, recruitment agreement or other required work document in writing.

Upon initial adoption, all CRS employees will be notified of this Plan through an agency-wide communication. As one of the primary tools used for ongoing employee awareness, CRS will post a copy of this Plan on CRS' internal and external websites, which can be accessed at any time. In addition, CRS will post a copy of this Plan at all CRS offices. If posting this Plan at a CRS office is not feasible, CRS will provide relevant Personnel with a printed copy of this Plan.

In addition, prior to beginning work associated with any Covered Government Agreement, Personnel will receive a copy of the Policy and a copy of this Plan. CRS will periodically conduct specialized training on the Policy and this Plan on an as-needed basis. In addition, Personnel will be encouraged to review the United States Department of State's information on human trafficking at <http://www.state.gov/j/tip/>.

Any breach or violation of this Plan by Personnel will result in disciplinary action, which may result in suspension or termination.

B. Recruitment, Wage Plan and Housing Plan

CRS prohibits misleading or fraudulent recruiting practices and only uses trained and licensed (where host-country licensing regulations exist) recruiters who comply with the labor laws of the jurisdiction in which the recruitment occurs. Any agreements between CRS and third-party recruiters must contain FAR 52.222-50 or the provisions required by the respective U.S. Government donor agency and explicitly provide that the recruiter will: (1) not intentionally provide inaccurate information during recruiting; (2) not charge applicants recruitment fees and (3) comply with the labor laws of the jurisdiction in which the recruiting occurs. CRS will take action, up to terminating any relationship, if it determines that a recruiter has violated CRS' recruiting policies as described above.

CRS will take steps to ensure that the wage offered to Personnel will comply with any applicable legal requirements in the employment location or that any variance will be explained.

If CRS is directly providing housing to Personnel, CRS will take steps to ensure that the housing will meet any applicable host-country housing and safety standards. Where necessary, such as when operating in high-risk countries, CRS may take further steps to develop more targeted courses of action for ensuring that provided housing meets applicable standards.

C. Personnel Documents and Return of Personnel

CRS may verify identity and immigration documents, such as passports or drivers' licenses, held by Personnel. However, at no time will CRS, nor any agent working on behalf of CRS destroy, conceal, confiscate or otherwise deny Personnel access to such documents.

If Personnel are relocating in support of a Covered Government Agreement, CRS will provide return transportation costs to allow Personnel to return to their home of record once their support of a Covered Government Agreement has ended, unless exempted by an official of the contracting agency, the individual is legally permitted to remain in the country of employment, or the individual takes a job with an organization that provides relocation to a new post.

Where required by law or contract, CRS will also make available to Personnel, in a format and language each individual can understand, copies of their written employment contract, written terms of their employment, or, if applicable, their recruitment agreement ("Employment Document"). Consistent with its existing policies, if Personnel are relocating in support of a Covered Government Agreement, CRS will provide any required Employment Document at least five calendar days prior to deployment. Such Employment Document shall include a description of the work to be performed and details regarding the prohibitions on charging recruitment fees, wage information, work location(s), living accommodations and associated costs (if CRS is providing housing), roundtrip transportation arrangements, time off and grievance processes.

III. Subcontracts and Subawards

A. General

With respect to any Covered Government Contract, CRS flows down FAR 52.222-50 to its subcontractors and agents, as required by that clause. CRS further requires that its subcontractors and agents flow down FAR 52.222-50 to ensure that all subcontractors and agents at every tier under a Covered Government Contract are subject to FAR 52.222-50. All subcontractors and agents (regardless of tier) are required to agree to ongoing monitoring for compliance with these requirements.

With respect to any Covered USG Award, CRS includes in all subawards and contracts the relevant provisions required by the respective U.S. Government donor agency and, if required, obligates its subrecipients and contractors to include these provisions in all subawards and subcontracts at any tier. All subrecipients and contractors, regardless of tier, are required to agree to ongoing monitoring.

Monitoring may include site visits and inspections by CRS, tailored to each subcontractor or subrecipient and may involve, among other things, a review of internal policies and procedures, training records, supply chain contracts and employee interviews.

B. Due Diligence

Prior to beginning performance of a subcontract or subaward under a Covered Government Agreement, CRS requires the completion of a self-assessment by each subcontractor or subrecipient. This self-assessment, which must be updated annually, is used to evaluate subcontractors' and subrecipients' risk for human trafficking and identifies the policies

and procedures of these entities aimed at preventing human trafficking. CRS' subcontractors and subrecipients that support a Covered Government Agreement will be responsible for collecting self-assessments from immediately lower-tier subcontractors or subrecipients.

C. Compliance Plan and Certification

Each subcontractor required to maintain a compliance plan under FAR 52.222-50(h) must submit to CRS a copy of its compliance plan and related certification prior to award of the subcontract and provide annual updates to this information. These subcontractors are also responsible for collecting compliance plans and certifications from their lower tier subcontractors, where required.

D. Monitoring

CRS will monitor or audit subcontractors and subrecipients, with or without advance notice, on a periodic basis and require remediation of any identified nonconformities. Failure by a subcontractor or subrecipient to address appropriately any identified deficiencies or other issues, or any violations of applicable USG requirements, will subject a subcontractor or subrecipient to business consequences, up to termination of the contract or agreement and suspension or debarment of the subcontractor or subrecipient.

IV. REPORTING PROCESS

All CRS employees or agents having knowledge or suspicion of violations of this Plan must report them immediately to a supervisor or through the anonymous reporting procedures specified in CRS' Whistleblower (Anti-Corruption) Policy (POL-HRD-GEN-0018). CRS' Global Hotline can be contacted by phone (+1-866-295-2632 (free call using Skype)), by email (alert@crs.org) and through the Internet (ethicspoint.com). All reported concerns will be promptly investigated by impartial CRS officials and, as appropriate, external counsel.

All CRS employees or agents are required to cooperate fully in any internal or external investigation (including, in consultation with the legal department, providing reasonable access to facilities and staff to ascertain compliance with laws and regulations prohibiting trafficking in persons) of suspected wrongdoing. As stated in the CRS Whistleblower (Anti-Corruption) Policy (POL-HRD-GEN-0018), any reprisal, threats, retribution or retaliation against any person who has reported, in good faith, suspected wrongdoing, or who is assisting in any investigation or process with respect to such a violation, is strictly prohibited.

CRS immediately will inform the relevant Contracting Officer or Agreement Officer and the cognizant agency's Office of Inspector General of any credible information of trafficking activity it receives as required by FAR 52.222-50(b) or the respective U.S. Government donor agency in connection with the award, performance or close-out of a Covered Government Agreement, including with respect to CRS' subcontractors or subrecipients.

Personnel may also report activity inconsistent with this Plan to the Global Human Trafficking Hotline at +1-844-888-FREE or help@befree.org.

V. RESOURCES AND ADDITIONAL ASSISTANCE

The CRS Country Representative where any Covered Government Agreement will be implemented is required to contact the Global Risk & Compliance Unit, which has developed resources to assist with the implementation of this Plan.

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