



POLICY AND COMPLIANCE PLAN

Policy Title: Anti-Human Trafficking	Responsible Executive: Thomas Müller
Policy No: LG- PY13	Function: Legal
Revision No.: 1	Effective Date: 13 April 2016

Note: INSIGHT is the official repository of this document's most current version.

1.0 SCOPE

This Policy and Compliance Plan ("Policy") defines ENGILITY's commitment to conduct its business in compliance with all applicable anti-human trafficking laws and regulations ("Anti-Trafficking Law").

2.0 APPLICABILITY

This Policy applies to all ENGILITY Personnel and Business Partners, whether operating within or outside of the United States.

3.0 POLICY STATEMENT

ENGILITY is committed to protecting the human rights of ENGILITY Personnel and all other individuals that work with or on behalf of ENGILITY. ENGILITY expects all ENGILITY Personnel to treat each other and its Business Partners and other individuals with dignity and respect.

In particular, no ENGILITY Personnel or Business Partner will traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. This specifically includes not transporting, harboring, recruiting, or transferring persons by means of threat, force, coercion, abduction, fraud, or payment to any person having control over another person for the purpose of exploitation.

In addition, all ENGILITY Personnel and Business Partners are required to report any potential violation of this Policy or Anti-Trafficking Law of which they become aware. **There will be no retaliation against any person who reports a possible violation in good faith, regardless of whether a violation has actually occurred.**

4.0 REASON FOR POLICY

The purpose of this Policy is to ensure that all ENGILITY Personnel understand their obligations to protect against human trafficking, including steps to promote compliance by its Business Partners. In particular, ENGILITY Personnel and its Business Partners shall not at any time:

- 4.1 Engage in forms of trafficking in persons;
- 4.2 Procure commercial sex acts;
- 4.3 Use forced labor in the performance of any contract or any other work;
- 4.4 Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents;
- 4.5 Use misleading or fraudulent practices to recruit employees, including using recruiters that do not comply with local labor laws;
- 4.6 Charge recruitment fees to actual or potential employees;



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- 4.7 Other than as detailed in Section 4.7.3, fail to provide return transportation and/or fail to pay for the cost of return transportation upon the end of employment for:
 - 4.7.1 An employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (for portions of contracts performed outside the United States); or
 - 4.7.2 For an employee who is not a United States national and who was brought into the United States for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the United States).
 - 4.7.3 The requirements of paragraphs 4.7.1 and 4.7.2 of this Policy shall not apply when:
 - 4.7.3.1 An employee is legally permitted to remain in the country of employment and chooses to do so; or
 - 4.7.3.2 ENGILITY is exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation for the employee;
- 4.8 Provide or arrange housing that fails to meet host country housing and safety standards; or
- 4.9 If required by law or contract, fail to provide a timely employment contract, recruitment agreement, or other required work document in writing and in a language the employee understands.

5.0 DISCIPLINARY ACTIONS

ENGILITY employees or other ENGILITY Personnel who violate this Policy and/or any applicable Anti-Trafficking Law will be subject to discipline, up to and including termination. Business Partners who violate this Policy and/or any applicable Anti-Trafficking Law will face termination by ENGILITY.

6.0 REPORTING VIOLATIONS

6.1 There will be no retaliation against any person who reports a possible violation in good faith, regardless of whether a violation has actually occurred.

6.2 Employees, including officers and directors, are also responsible for reporting any possible violations of applicable laws and/or this Policy to their supervisor, the Compliance Officer, or the Ethics Officer. Employees may also report any concerns anonymously via ENGILITY's Ethics Reporting Site (www.ENGILITYcares.com) or Helpline (855-364-2633). In addition, employees may report concerns to the Global Human Trafficking Hotline at 1 844-888-FREE or by e-mail at help@befree.org.



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appropriate remedial and referral actions.

- 9.3 Business Partners shall furnish a copy of their compliance plan when requested by ENGILITY.
- 9.4 Business Partners shall monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in any prohibited activities at FAR 52.222-50(b) and Section 4 of this Policy.
- 9.5 Business Partners shall insert the clauses 52.222-50 and 52.222-56 in all applicable subcontracts, require subcontractors at all tiers to submit an annual compliance certification and to monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in any prohibited activities at FAR 52.222-50(b).
- 9.6 If a Business Partner is made aware of a suspected trafficking violation, that Business Partner must investigate such allegations, take appropriate remedial measures, and immediately notify ENGILITY of that information, as well as what action it has taken with respect to the allegation.
- 9.7 Business Partners shall cooperate with any Federal agency conducting an audit or investigation of potential anti-trafficking violations, including providing timely responses to Government investigators and providing reasonable access to facilities and staff.
- 9.8 ENGILITY will monitor Business Partner's compliance with this Policy using risk-based assessments based on product or service being acquired or performed, as well as location of performance. Business Partners agree to inspection and audit by ENGILITY, and any suspected activity will be investigated and reported pursuant to this Policy.

10.0 POSTING

The program and/or project manager for the subject contract will ensure that relevant contents of this Policy shall be posted no later than the commencement of contract performance at the workplace (unless the work is to be performed in the field or not in a fixed location). The policy will also be posted on ENGILITY's website.

11.0 CERTIFICATION

When required by FAR 52.222-50(h) or FAR 52.222-56, ENGILITY will certify to the Government that it (i) will maintain this Policy; (ii) will monitor, detect and terminate any Business Partner engaged in prohibited activities; and (iii) after conducting sufficient due diligence, to the best of its knowledge and belief, neither ENGILITY nor any of its Business Partners are engaged in prohibited activities, or if there are violations, ENGILITY or its Business Partners have taken the appropriate remedial actions.

12.0 REFERENCES

Please see the following list of related documents for additional information associated with this Policy.

- FAR 22.17 – Combating Trafficking in Persons



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- FAR 52.222-50 – Combating Trafficking in Persons (Mar 2015)
- FAR 52.222-56 - Certification Regarding Trafficking in Persons Compliance Plan (Mar 2015)
- ENGILITY’s Code of Ethics and Business Conduct
- ENGILITY’s Supplier Code of Conduct
- ENGILITY online training module on anti-human trafficking

13.0 DEFINITIONS

- 13.1 “Business Partner” means any ENGILITY advisor, agent or other representative, non-controlled joint venture entity, vendor, subcontractor, supplier or other Business Partner.
- 13.2 “ENGILITY” means ENGILITY Holdings, Inc. and any entity which ENGILITY Holdings, Inc. controls, is controlled by or under common control with. The term “control” shall mean (i) direct or indirect ownership of more than 50 percent of the voting interests of such entity or in which control is possessed and exercised by or on behalf of ENGILITY; or (ii) a joint venture arrangement through which ENGILITY owns, directly or indirectly, more than 50 percent of the voting interests in the joint venture or in which control over the joint venture is possessed and exercised by or on behalf of ENGILITY.
- 13.3 “ENGILITY Personnel” means all ENGILITY officers, directors, and employees, including temporary employees and contract-basis employees and personnel of ENGILITY, wherever located.
- 13.4 “Forced labor” means knowingly providing or obtaining the labor or services of a person by means of:
- Threats of serious harm to, or physical restraint against that person or another person; or
 - The abuse or threatened abuse of law or the legal process.
- 13.5 “Forms of trafficking in persons”:
- 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
 - 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.
- 13.6 “Sex trafficking”: Recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

14.0 REVISION HISTORY

Revision Number	Revision Description	Effective Date	Section Reference
0	Initial Release of policy	01/01/2016	NA
1	Miscellaneous updates	04/13/2016	NA



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14.0 APPROVAL

Responsible Executive: Tom Miiller	Function: Senior Vice President, General Counsel & Corporate Secretary
Signature: 	16092706.1