



**Veterans First Initiative, LLC**

# **Combating Trafficking in Persons (CTIP)**

## **Policy and Compliance Plan**

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## RECORD OF REVISION(S)

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## 1. Overview

Veterans First Initiative, LLC (VFI) has a zero-tolerance policy regarding trafficking in persons. VFI opposes any form of human trafficking, including slavery, sex trafficking, involuntary servitude, forced or compulsory labor, child labor, and any related activities. We find these activities inherently harmful and dehumanizing. No employee nor any VFI agent, subcontractor, vendor, or supplier shall solicit, obtain, or be involved in such activities. If any employee, agent, or subcontractor is found to have engaged in such behavior, VFI will take appropriate action, up to and including termination of employment or severance of services.

## 2. Policy

In accordance with Federal Acquisition Regulation (FAR) 52.222-50, VFI has developed this *Combating Trafficking in Persons - Policy and Compliance Plan* (the “Plan”) to be implemented on United States (U.S.) Government contracts or subcontracts for supplies, other than commercially available off-the-shelf (COTS) items, acquired outside the U.S. or services to be performed outside the U.S. and has an estimated value that exceeds \$550,000. The purpose of this Plan is to ensure employees, agents, and subcontractors are aware of prohibited conduct under Combating Trafficking in Persons regulations and laws, as well as actions that may result from violations.

### A. Prohibited Activities

VFI fully supports the U.S. Government’s policy prohibiting trafficking in persons, and strictly prohibits employees, agents, and subcontractors from:

1. Engaging in severe forms of trafficking in persons during the period of performance of the contract;
2. Procuring commercial sex acts during the period of performance of the contract;
3. Using forced labor in the performance of the contract;
4. Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
5. (i) Using misleading or fraudulent practices during the recruitment of employees 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;  
(ii) Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
6. Charging employees recruitment fees;

7. (i) Failing to provide return transportation or pay for the cost of return transportation upon the end of employment—
  - (A) For an employee who is not a national of the country in which the work is taking place and who was brought into that country to work on a U.S. Government contract or subcontract (for portions of contracts performed outside the United States); or
  - (B) For an employee who is not a United States national and who was brought into the United States to work 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); except that—
- (ii) The requirements of paragraphs (b)(7)(i) of this clause shall not apply to an employee who is-- (A) Legally permitted to remain in the country of employment and who chooses to do so; or (B) Exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation;
- (iii) The requirements of paragraph (b)(7)(i) of this clause are modified for a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons. The contractor shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. For example, the contractor shall not only offer return transportation to a witness at a time when the witness is still needed to testify. This paragraph does not apply when the exemptions at paragraph (b)(7)(ii) of this clause apply.
8. Providing or arrange housing that fails to meet the host country housing and safety standards; or
9. If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

## **B. Disciplinary Actions**

If any employee, agent, subcontractor, vendor, or supplier is found to have engaged in prohibited activities, VFI will promptly take action, including but not limited to the following, as applicable:

- Termination of employment, or removal of employee from the contract;



- Reduction in employee benefits;
- Require the subcontractor to remove subcontractor employee(s) from the contract;
- Decline to exercise available options under the subcontract;
- Termination of the contract for default or cause, in accordance with the termination clause of the contract, or require the subcontractor to terminate a contract; or
- Termination of the business relationship with the subcontractor.

Furthermore, VFI will report prohibited activities and any actions taken against an employee, agent, or subcontractor to the Contracting Officer and the agency Inspector General, as required by FAR 52.222-50.

### 3. Compliance Plan

VFI has established the following plan to comply with FAR 52.222.-50(h), including the following six areas: Awareness Program; Reporting Methods; Recruitment and Wage Plan; Housing Plan; Monitoring Procedures for Agents and Subcontractors; and Posting.

#### A. Awareness Program

VFI provides this *Combating Trafficking in Persons – Policy and Compliance Plan* via the company's website (vetfi.com) and its Personnel Portal (<https://workforcenow.adp.com>) to inform all employees and new hires about prohibitions against trafficking-related activities described in FAR 52.222-50(b), the activities prohibited, consequences for violating company policy (*see Section 2.B*), and reporting methods. Each employee is required to acknowledge they have seen, read, and understand the Plan, using instructions provided on the Portal. Additional information about Trafficking in Persons can be found at the web site for the Department of State's Office to Monitor and Combat Trafficking in Persons: [www.state.gov/j/tip](http://www.state.gov/j/tip).

Additional Awareness Program actions include:

- Employees deployed to OCONUS sites are required to read the Plan upon arrival in the country where the work will take place. Within three days, employees will deliver to their supervisor a signed electronic acknowledgement form stating that the employee has read the plan, commits to compliance with FAR 52.222-50 and VFI's company policy, and understands that disciplinary actions will be taken against employees, agents, and subcontractors for violations.
- VFI periodically conducts specialized training on the Combating Trafficking in Persons regulations for personnel, including staff deployed OCONUS, executives, and procurement personnel. VFI uses the Department of Defense's Combating Trafficking in Persons (CTIP) General Awareness Training at [https://jko.jten.mil/courses/J3TA-US1328-A\\_CTIP\\_GA\\_Standalone/launch.html](https://jko.jten.mil/courses/J3TA-US1328-A_CTIP_GA_Standalone/launch.html). Any employee required to take and complete this General Awareness CTIP training must provide a copy of their completion certificate to their supervisor.



- A summary of VFI's Combating Trafficking in Persons commitment is included in VFI's Employee Handbook, which is available on the company's Personnel Portal.

## **B. Reporting Methods**

Any VFI employee, agent, or subcontractor doing work on behalf of VFI is required to report information or knowledge of actual or potential human trafficking violations set forth in FAR 52.222-50, without fear of retaliation, to the employee's supervisor and/or VFI Human Resources at [contact@vetfi.com](mailto:contact@vetfi.com) or +1 571-360-4858.

Any VFI employee, agent, or subcontractor doing work on behalf of VFI may also report violations by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

***Retaliation against an individual who reports a violation is strictly prohibited.***

## **C. Recruitment and Wage Plan**

VFI permits only the use of recruitment and staffing companies that provide proper training to employees, prohibits charging recruitment fees to the employee, ensures compliance with local labor laws, and ensures wages meet applicable host country legal requirements or explains any variance.

VFI prohibits using misleading or fraudulent practices to recruit employees, such as failing to use language that is understandable to workers or failing to disclose basic information regarding the key terms and conditions of employment and, if applicable, potentially hazardous work conditions.

## **D. Housing Plan**

If VFI intends to provide or arrange housing for employees, agents, or subcontractors, the company will develop a housing plan that meets or exceeds host-country housing and safety standards.

If VFI's agents or subcontractors intend to provide or arrange housing for workers, the agents or subcontractors will develop a housing plan that meets or exceeds host-country housing and safety standards.

## **E. Monitoring Procedures for Agents and Subcontractors**

For U.S. government contracts specified under FAR 52.222-50, VFI requires agents and subcontractors to comply with all applicable laws and regulations to combat trafficking in persons. To monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in such activities, VFI requires all agents and subcontractors to annually submit and certify an internal policy and plan that meets FAR 52.222-50 requirements. This representation is designed to provide VFI with sufficient information to assess the practices of its agents and subcontractors with respect to Combating Trafficking in Persons compliance. If VFI determines that a subcontractor or agent has engaged in prohibited activities, VFI will implement disciplinary action in accordance with this Plan (*see Section 2.B*).



## **F. Posting**

VFI posts this Plan at VFI work locations (unless the work is to be performed in the field or not in a fixed location), and on the company website and employee personnel portal. VFI will provide its Plan to the Contracting Officer upon request. The Department of Defense's 'Combating Trafficking in Persons Hotline Poster' is also posted in VFI-controlled work locations (*see Appendix A*).



## 4. Appendix A: Department of Defense's 'Combating Trafficking in Persons Hotline' Poster



**COMBATING TRAFFICKING IN PERSONS**  
U.S. DEPARTMENT OF DEFENSE

**STOP Human Trafficking**  
Force, fraud, or coercion to compel a person to provide labor, services, or commercial sex.

Victims come from all backgrounds and can be women, men, and children.

Any minor (under 18 years of age) involved in commercial sex is a victim of human trafficking.

**Recognize SIGNS**

Physical/Environmental Indicators include signs of abuse, no identification, confined to worksite.

Psychological/Behavioral Indicators include submissive, anxious, lack of free will.

**REPORT IT**

Chain of Command  
Local Law Enforcement  
DoD Inspector General Hotline  
1-800-424-9098 or visit <http://www.dodig.mil/hotline>  
National Human Trafficking Hotline  
1-888-373-7888.

For more information go to:  
**CTIP.defense.gov/**