



Anti-Trafficking of Humans Compliance Plan

DOC-00686 REV B

Crystal Group, Inc.

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1.0 Purpose

- 1.1 Crystal Group, Inc. (CGI) has developed this Anti-Trafficking Compliance Plan (“Plan”) in accordance with the U.S. Government’s policy regarding trafficking in persons by government contractors and award recipients, as set out in FAR Subpart 22.17 and 52.222-50(h).
- 1.2 The purpose of this Plan is to ensure employees, agents and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations.
- 1.3 The scope of the Plan includes the operations and activities of CGI as well as those subcontractors and agents in its supply chain performing on this contract. This Plan is maintained by the Contracts Office located at 855 Metzger Drive, Hiawatha, IA 52233-1204.

2.0 Applicability

- 2.1 In accordance with FAR 52.222-50(h), CGI has developed this Plan to be implemented on United States Government contracts or subcontracts for supplies, other than commercially available off-the-shelf items, acquired outside the United States or services to be performed outside the United States and has an estimated value that exceeds \$500,000.

3.0 Appropriateness of Plan

- 3.1 This Plan shall be appropriately tailored with respect to the size and complexity of the contract and to the nature and scope of the activities to be performed for the Government, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.
 - 3.1.1 Crystal Group has hired only US Citizens or Permanent Residents.
 - 3.1.2 Crystal Group’s Procurement Team actively seeks to limit the number of services and supplies procured outside the US. Currently, CGI does not utilize foreign subcontracts for US Government supplies or services. Should this change in the future, the Plan will be appropriately updated to reflect requirements in FAR 52.222-50.

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EAR Hardware ECCN: 5A992.C
EAR Technical Data ECCN: 5E992

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4.0 Plan Requirements

4.1 Employee and Subcontractor Prohibitions

- 4.1.1 Note: all words or phrases in Section 4.1 marked with an “*” adhere to the definition provided in FAR 52.222-50.
- 4.1.2 Engaging in severe forms of trafficking in persons*.
- 4.1.3 Procuring commercial sex acts*.
- 4.1.4 Using trafficked labor.
- 4.1.5 Destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- 4.1.6 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 employee, 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 costs to be charged to the employee, and, if applicable, the hazardous nature of the work.
- 4.1.7 Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- 4.1.8 Charging employees recruitment fees* .
- 4.1.9 Failing to pay return transportation costs upon the end of employment, for certain employees* who are not nationals of the country in which the work is taking place (with some exceptions as specified under FAR 52.222.50(b)(7)).
- 4.1.10 Providing or arranging housing that fails to meet the host country housing and safety standards.
- 4.1.11 If required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document in writing in a language the employee understands, containing a detailed description of the terms and conditions of employment, at least five days before an employee relocates to perform work.

4.2 Awareness Program

- 4.2.1 This Plan is summarized in CGI’s Employee Handbook and describes prohibited trafficking related activities and the actions that will be taken against employees for violations.
- 4.2.2 Additionally, CGI includes an overview of Combatting Trafficking in Persons in the annual Contracts & Export Employee Training course for all employees with supplier delegation of authority, provides employees with general information, reporting requirements and examples of trafficking in the supply chain.

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- 4.2.3 CGI also periodically conducts specialized training on the Combatting Trafficking in Persons regulations Plan, as needed.

4.3 Recruitment and Wage Plan

- 4.3.1 CGI permits only the use of recruitment companies who have trained employees, prohibit charging recruitment fees to the employee and ensure that wages meet applicable host country legal requirements or explain any variance.
- 4.3.2 CGI strictly prohibits misleading or fraudulent recruiting practices during the recruitment of both local and migrant employees. All labor recruiters working for or with CGI and its suppliers and subcontractors have committed to provide complete and accurate information to all employees regarding the assignment they are being offered.
- 4.3.3 CGI has several standards and controls in place to ensure compliance with this Plan, including the Ethics Code of Conduct. Human Resources has recruitment policies that prohibit the use of any fraudulent or misleading recruitment practices. CGI does not charge recruitment fees to any candidate. Employees hired in COs are paid per established salary ranges that meet or exceed local labor law.

4.4 Housing Plan

- 4.4.1 CGI does not provide housing to employees. Should this policy change in the future, the Plan will ensure that any housing meets the host country safety standards.

4.5 Supplier Compliance

- 4.5.1 All CGI contractors, consultants, vendors, suppliers, subcontractors and subrecipients (“Suppliers”) must agree to comply with the Policy and all applicable Anti-Trafficking Provisions.
- 4.5.2 CGI includes language to that effect in all Supplier contracts, subcontracts and sub agreements (“Supplier Contracts”), including inserting FAR 52.222-50, FAR 52.222-56 where applicable.
- 4.5.3 CGI staff in finance and procurement shall screen all subrecipients, consultants, and suppliers to ensure they do not appear on the one of the Excluded Parties Lists, the UN Consolidated List, or the OFAC Sanctions List.
- 4.5.4 CGI agents and subcontractors must have procedures to prevent trafficking in persons and to monitor, detect and terminate any agents, subcontracts or subcontractor employees that have engaged in such activities.

4.6 Process to Report

- 4.6.1 Any CGI employee or third-party doing work on behalf of CGI is required to report information or knowledge of the actual or potential human trafficking violations to the Ombudsman, the employee’s supervisor / leader, or Human Resources.

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- 4.6.2 CGI employees or third-party doing work on behalf of CGI may also report violations by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org. CGI has made available the hotline number and email address in all worksites.
- 4.6.3 Retaliation against an individual who reports a violation is strictly prohibited. Additionally, CGI will not interfere with employees cooperating fully with government authorities.

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4.7 Remediation

- 4.7.1 CGI shall audit applicable subcontracts and suppliers, including labor recruiters without advance notice, on a regular basis determined by the applicability and appropriateness of the Plan, and require remediation of all identified nonconformities. Failure to address audit issues will have business consequences, up to and including termination and disbarment from future contracts. Any violation of FAR requirements could result in CGI terminating the contract of a subcontractor or agent.
- 4.7.2 In the event of the receipt of credible information alleging violation of FAR 52.222-50 (b), CGI will immediately notify the Contracting Officer, Customer, and agency Inspector General of the specific nature of the activity, including specific remedial actions taken and take appropriate corrective and preventive action, up to and including dismissal of employees and terminations of contracts with subcontractors, suppliers or agents.

5.0 Posting

- 5.1 CGI will post this Plan at the workplace (unless the work is to be performed in the field or not in a fixed location) and on its external website, www.crystalrugged.com. This plan is also available to the Contracting Officer upon request.

6.0 Certification

- 6.1 Annually after receiving an award above the applicability thresholds, CGI will certify to the Government that:
 - 6.1.1 It has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities.
 - 6.1.2 After having conducted due diligence, to the best of CGI's knowledge and belief, neither it nor any of its agents, subcontractors or their agents are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, CGI or its subcontractor has taken the appropriate remedial and referral actions.

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