



**NUMARK ASSOCIATES, INC.**

**COUNTERING TRAFFICKING IN PERSONS  
COMPLIANCE PLAN**

**September 18, 2024**

## COUNTERING TRAFFICKING IN PERSONS COMPLIANCE PLAN

### Purpose

NUMARK Associates, Inc. (NUMARK) and the United States Government prohibit trafficking in persons. The U.S. Government's policy prohibiting trafficking in persons is available at FAR 52.222-50, Combating Trafficking in Persons, and is summarized below under the heading: "Summary of U.S. Government Policy of Prohibiting Trafficking in Persons."

NUMARK is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. NUMARK will not tolerate or condone human trafficking or slavery in any part of our global organization.

NUMARK employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom and with whom NUMARK conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

### Scope

This policy applies to all personnel employed by or engaged to provide services to NUMARK, including, but not limited to, employees, officers, and temporary employees of NUMARK and NUMARK's U.S. and international subsidiaries, and independent contractors (for ease of reference throughout this policy, "employees").

Every employee is responsible for reading, understanding and complying with this policy. NUMARK managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them.

Anyone with questions or concerns relating to this policy should contact the NUMARK contracts department or human resources department. Anyone who suspects that trafficking in persons is occurring should follow the procedure outlined below.

### Procedures

NUMARK's management is committed to making its employees and subcontractors aware of the prohibition on trafficking in persons as defined herein. The requirements contained herein are part of all subcontracts and independent consultants' contracts, and both subcontractors and independent consultants are required to provide NUMARK with annual certifications of their compliance with the policy or explanations of and corrective actions taken to address any noncompliances. If subcontractors or independent consultants are found to have potentially been involved in human trafficking, their actions will be promptly reported in accordance with NUMARK's process defined herein, and their contracts are subject to immediate termination as a result of such a finding.

NUMARK employees must report any conduct that they believe to be a violation of this policy to NUMARK's contracts or human resources department. NUMARK's contracts or human resources department will follow the government's reporting requirements immediately. No one should conduct an internal investigation in advance of such reporting. In addition to reporting suspected violations to NUMARK's contracts or human resources department contacts, NUMARK employees may report this information to the hotline phone number of the Global

Human Trafficking Hotline at 1-844-888-FREE or to its email address at [help@befree.org](mailto:help@befree.org). Upon receiving a report regarding the suspicion that human trafficking has occurred or is occurring, NUMARK's contracts or human resources department representative will notify the Global Human Trafficking Hotline in advance of initiating any internal investigation.

Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy. Additionally, NUMARK management overseeing subcontractor and independent contractor performance under this task order are accountable for (1) tracking receipt of subcontractors and independent consultant's annual certifications of compliance with the prohibitions on trafficking in persons; (2) assessing work scopes assigned to those companies or individuals for the potential for trafficking in persons to arise and providing additional oversight of that work when such a potential is identified; and (3) continually observing and evaluating the conduct of and work force provided by those companies and independent consultants for indices of human trafficking and immediately reporting any suspect conduct in accordance with this policy.

### **Summary of US Government Policy of Prohibiting Trafficking in Persons**

The United States Government has adopted a policy prohibiting trafficking in persons including the trafficking-related activities of this clause. Contractors, contractor employees, and their agents shall not-

- (1) Engage in trafficking in persons during the period of performance of the contract;
- (2) Procure commercial sex acts during the period of performance of the contract;
- (3) Use forced labor in the performance of the contract;
- (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, regardless of issuing authority;
- (5) (i) Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language understood by the employee or potential 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 or potential employee, and, if applicable, the hazardous nature of the work;
- (ii) Use 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;
- (7) (i) Fail 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 for the purpose of working 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 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); 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) Provide or arrange housing that fails to meet the host country housing and safety standards; or

(9) If required by law or contract, fail 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.



## **Disciplinary Actions**

NUMARK will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this policy may be grounds for disciplinary action, up to and including termination. NUMARK and its subsidiaries have the exclusive right to interpret this policy regarding their respective employees.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.