



COMBATTING TRAFFICKING IN PERSONS

PELABO - Anti-Trafficking Policy

PELABO is committed to protecting vulnerable populations from trafficking.

Trafficking in persons includes the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Exploitation includes, but is not limited to, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs.

Specifically, Company employees, agents/suppliers shall not:

- 1) Engage in the trafficking of persons
- 2) Procure commercial sex acts
- 3) Use forced labor in the performance of Company or Project activities
- 4) Destroy, conceal, confiscate, or otherwise denying an employee access to that 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) 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) Providing or arranging housing that fails to meet the host country housing and safety standards
- 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

Reporting Requirements and Procedure

All PELABO personnel, Suppliers and Supplier Personnel are required to report any suspected trafficking-related activity or violation of this policy. Reports may be made to the PELABO Human Resources office.

In addition, reports may be made to:

The Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org

The Company will investigate all reports of prohibited trafficking-related activity or violations of this policy and take appropriate action, including reporting to the Company's Prime Contractor for further action (if applicable).

PELABO strictly prohibits retaliation against any Company employee or agent who reports prohibited trafficking-related activity or other violations of policy, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. Company personnel who engage in any form of retaliation against those who report prohibited trafficking-related activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment or other contract/agreement.

The Company reserves the right to take action against employees, suppliers/agents for violations of this policy. Such actions for employees may include, but are not limited to, suspension/termination of employment, or contract/agreement.

Investigations

The Company will cooperate fully with any US Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to Company facilities and staff.

The Company will protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited and will not prevent or hinder these employees from cooperating fully with US government authorities.