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## 1. Purpose

Benguela Health is opposed to human trafficking in all forms and is supportive of the US Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons (hereafter referred to as FAR 52.222-50) to combat human trafficking, and will ensure the risk of such practices is mitigated within the business.

FAR 52.222-50 prohibits US Government contractors and their agents from engaging in any severe form of trafficking in persons, defined to mean the recruitment, harbouring, transportation, provision or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, debt bondage or slavery and sex trafficking. To comply with FAR 52.222-50 all applicable businesses engaged in contract with the US Government must develop a Compliance Plan to ensure such mitigation of risks.

## 2. Applicability

The Benguela Human Trafficking Compliance Plan applies within the business to contracts or subcontracts with the US Government for supplies (other than commercially available off-the-shelf items) or services, acquired or performed outside of the US with an estimated value that exceeds \$500,000.

The plan is to be adhered to by employees, suppliers, contractors, subcontractors, subcontractor employees and agents of Benguela, including subsidiaries and joint ventures controlled by Benguela, performing work under a US federal government contract.

## 3. Plan constraints

According to FAR 52.222-50, a Compliance Plan must be appropriately tailored to the size and complexity of the US Government contract, and to the nature and scope of the activities to be performed. The Benguela Human Trafficking Compliance Plan outlines compliance with FAR 52.222-50.

Benguela reserves the right to review and further develop its Human Trafficking Compliance Plan should the nature and complexity of its contracts with the US Government change.

## 4. Compliance Plan

### a. Awareness Training

The Human Trafficking Awareness Training is conducted during the on-boarding process and on an as needed basis thereafter.

## b. Risk assessment

An overall risk assessment is conducted as part of the Benguela Annual Risk Review process to assess the risk to the business in relation to FAR 52.222-50. If it is identified that a supplier falls within the requirements a risk assessment on the supplier may be conducted.

## c. Recruitment / Wages / Housing

Benguela strictly prohibits misleading or fraudulent recruiting practices during local and international location recruitment. Benguela will only use recruitment companies who do not charge recruitment fees to the employee and will review upon engagement recruitment companies' terms of business to ensure compliance. Benguela will take measures to ensure employee wages meet applicable host-country legal requirements or will explain any variance.

In the event that Benguela or its contractors, suppliers and agents intend to provide or arrange housing in connection with performing work under a contract that meets the requirements, housing will meet host-country housing and safety standards.

## d. Procedure for contractors, suppliers and agents

The requirement to adhere to FAR 52.222-50 is mandatory to all contractors, suppliers and agents Benguela engages with. This requirement is to be flowed down to all sub-tier contractors, suppliers and agents who engage in business indirectly with Benguela. The substance of FAR 52.222-50 will be included in subcontracts and in contracts with agents. However, requirements for a Compliance Plan apply only to any portion of the subcontract that meets the same prime contractor thresholds. Contractors, suppliers and agents with a Compliance Plan in place must submit certification upon award of contract and on an annual basis thereafter.

Benguela requires contractors, suppliers and agents to comply with all applicable local, state and national government laws and regulations of the local region they are conducting operations in. Upon request, information will be made available to all contractors, suppliers and agents on combating human trafficking including copies of this plan and internal training materials. If in the vicinity, Benguela employees have the right to observe contractor premises for any violations of FAR 52.222-50.

Benguela reserves the right to take appropriate action and remedies/ referrals if a problem arises, and to terminate any contract should a report of violation be substantiated.

## e. Process for reporting violations

Should employees or contractors, suppliers and agents be unsure as to whether a specific action would be a violation of FAR 52.222-50, they should consult any member of Benguela's Leadership Team.

All employees or contractors, suppliers and agents are required to report information or knowledge of human trafficking internally to a member of the Leadership Team in the first instance. If the employee does not feel comfortable reporting this information internally, they are able to email [help@befree.org](mailto:help@befree.org). Retaliation against an individual who has reported a violation will not be tolerated.

#### f. Certification

If applicable, after receiving an award and annually thereafter, Benguela will certify that it has a Compliance Plan in place, has conducted due diligence and has acted on any violations found. Certification for contractors, suppliers and agents that meet the threshold will also be requested at this time.

#### g. Further Information

All employees and contractors are encouraged to come forward to discuss the topic of Human Trafficking, or a perceived or actual violation, at any time. For further information not covered in this plan please contact a member of Benguela's Leadership Team.