

Anti-Trafficking Policy and Compliance Plan

PURPOSE

The Anti-Trafficking Policy and Compliance Plan (Policy and Compliance Plan) is designed to combat human trafficking. This policy and plan applies to all Education Development Center, Inc. (EDC) employees, subcontractors, subawardees and contractors at any tier and is consistent with EDC's Code of Business Conduct and overall values, mission and purpose.

Policy

EDC complies with the requirements of Federal Acquisition Regulation (FAR) 52.222-50, Combating Trafficking in Persons and USAID's Mandatory Standard Provision entitled Trafficking in Persons, which prohibits contractors, recipients, subcontractors, subawardees, and contractors at any tier from engaging in human trafficking, the use of forced labor or the procurement of commercial sex acts. For all work performed by EDC, the following will apply:

This policy serves as notification of EDC's commitment to prohibiting trafficking in persons, including trafficking-related activities. This policy explains the consequences for violating the policy, as well as the mechanisms for reporting violations. EDC strictly prohibits destroying, concealing, confiscating, or otherwise denying access by the employee to the employee's identity or immigration documents.

Compliance Plan

In addition to the policy, the following compliance plan is required on U.S. government contracts and awards in excess of \$500,000 for work performed outside the United States.

- A. A copy of this Policy and Compliance Plan will be posted at the worksites of all U.S. government contracts for work performed outside the United States in excess of \$500,000. A copy will also be posted on the EDC internal website.
- B. Obtain assurances from subcontractors, subawardees, and contractors as required.
- C. If requested, a copy will be provided to the applicable contracting or agreement officer.
- D. If there are any substantiated allegations of human trafficking, EDC will ensure they are included in the Federal Awardee Performance and Integrity Information System (FAPIIS).

I. Responsibilities

- A. Employees will be required to be aware of and understand the information contained in this Policy and Compliance Plan.
- B. EDC strictly prohibits misleading or fraudulent recruiting practices during the recruitment of employees and consultants. Employees with recruiting responsibilities may not charge a prospective employee any type of recruiting fee and are required to provide accurate information to all potential employees regarding the assignment(s) they are being offered.

- C. If EDC provides housing to certain employees, such housing will be, at a minimum, in compliance with the host country's safety standards.
- D. EDC will provide return transportation costs for employees who have completed their assignment(s) outside of the employees' country of residence in accordance with the terms and conditions of their employment agreement.
- E. EDC will protect and interview all employees suspected of being victims of or witnesses to prohibited human trafficking activities. This will occur prior to the employee returning to his or her country of origin if the employee is located outside the country of origin at the time of the incident being reported. EDC will not prevent or hinder employees from cooperating fully with government authorities.
- F. If applicable under the laws of the location where the work is to be performed, EDC will provide a written contract/agreement to staff performing the work, containing the wages they are to be paid while on the assignment, in the employees' native language prior to their departing from their country of origin.
- G. In the event of any suspected human trafficking-related activity, EDC will notify, as necessary, the Inspector General of the applicable government agency, the official responsible for suspension or debarment actions, and, if necessary, law enforcement.

II. EDC Disciplinary Measures

- A. Employees who are not acting in accordance with this Policy and Compliance Plan will be subject to disciplinary actions, up to and including termination.
- B. Any consultants, subcontractors, subawardees or subcontractor/subawardee employees who are determined to have engaged in human trafficking-related activities will be terminated immediately from providing work for EDC.
- C. EDC will promptly remedy all violations of this policy of which EDC is made aware, and in such a way as to correct the violation and ensure that preventive measures are in place to prevent future violations, including but not limited to termination of employment, contract/agreement suspension, or termination for violations.

III. Trafficking Reporting

All EDC employees are required to promptly report any suspected human trafficking-related activity to the Office of Legal Affairs (OLA) in the following ways:

- 1. Mail: EDC
43 Foundry Avenue
Waltham, MA 02453
ATTN: Christine Filosa
- 2. Fax: 617-969-5979
ATTN: Office of Legal Affairs/Christine Filosa
- 3. E-mail: cfilosa@edc.org
- 4. Phone: +1-617-618-2247

EDC employees may also report violations to the EDC Whistleblower Hotline anonymously or by name:

- 1. Phone: +1-855-833-5029
- 2. Website: www.edc.ethicspoint.com

In addition, EDC employees may contact the Global Human Trafficking hotline at +1-844-888-4833 or by e-mail at help@befree.org.

Reports of violations or suspected violations, whether reported anonymously or not, will be kept confidential to the extent possible and consistent with the need to conduct a thorough investigation. Reporters may not be discharged, demoted, or otherwise discriminated against as a reprisal for reporting information they reasonably believed is evidence of human trafficking, use of forced labor, or the procurement of commercial sex acts.

IV. Certification

EDC must certify annually during performance of any covered contract that:

- This Policy and Compliance Plan is currently in place and actively adhered to at all times.
- To the best of EDC's knowledge and belief, neither EDC nor any of its employees, subawardees subcontractors, or consultants are engaged in any human trafficking-related activities, including human trafficking, the use of forced labor, or the procurement of commercial sex acts during contract performance.
- No abuses have been found to date, or if any abuses have been reported, EDC has taken appropriate actions in response to the abuse(s).

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Approved by: Management Council

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