



# **Combating Trafficking in Persons (CTIP) Compliance Plan**

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## 1.0 Executive Summary

Vetegrity is opposed to human trafficking and forced labor in any form. We are committed to best practices and requirements for Combatting Trafficking in Persons (CTIP). The US Government has a zero-tolerance policy regarding any Government employees and contractor personnel and their agents engaging in any severe form of trafficking in persons, defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery and sex trafficking.

Vetegrity personnel are required to comply with the provisions contained in the Federal Acquisition Regulation; Ending Trafficking in Persons (48 CFR Parts 1, 2, 9, 12, 22, 42, and 52) (the “FARS”) and Defense Federal Acquisition Regulation Supplement: Further Implementation of Trafficking in Persons Policy (48 CFR Parts 203, 204, 212, 222, and 252) (the “DFARS”) Executive Order 13627, “Strengthening Protections Against Trafficking in Persons in Federal Contracts,” (the “Executive Order”) as well as Vetegrity’s Policy regarding Combating Trafficking in Persons (the “Vetegrity CTIP Policy”):

To the extent these provisions differ in their requirements, the stricter requirements must be followed.

The following sets forth Vetegrity’s compliance plan for Combating Trafficking in Persons.

Additional awareness information about trafficking in persons may be found at the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons website at <http://www.state.gov/j/tip>.

## 2.0 Awareness Program

Pursuant to the FARs, contractors, contractor employees and their agents are prohibited from:

- Engaging in severe forms (i.e., using force, fraud or coercion) of trafficking in persons during the period of performance of a contract.
- Procuring commercial sex acts during the period of performance of a contract .
- Using forced labor in the performance of a contract.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority.
- Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, 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.
- Using recruiters that do not comply with the local labor laws of the country in which the recruiting takes place.
- Charging employees recruitment fees.

- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who was not a national of the country in which the work is taking place and who was brought into that country for the purposes of working on a U.S. Government contract, subcontract or portion(s) of contracts or subcontracts performed outside the United States.
- Failing to provide return transportation or pay for the costs of return transportation upon the end of employment, 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 and subcontracts performed inside the United States.
- Providing or arranging housing that fails to meet the host country housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing 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.

Any violation of the FARs, the DFARS, the Executive Order and/or the Vetegrity CTIP Policy could result in disciplinary action which may include but is not limited to, an employee's removal from a contract, reduction in benefits, or termination of employment.

### **3.0 Employees**

On an annual basis, Vetegrity requires all employees to complete compliance training (online or in-person) and to certify that they have read, are aware of, understand, and agree to comply with the policies, procedures and principles of the Vetegrity CTIP Policy and report any violations of which they are aware. The Vetegrity CTIP Policy is publicly posted on the Vetegrity website:

Vetegrity conducts compliance training approximately annually and as needed throughout the year. Such compliance training is targeted and customized for various business units and appropriate to the nature and scope of the activities to be performed. Compliance with the Vetegrity CTIP Policy shall be included in compliance training for each business unit at least annually.

### **4.0 Subcontractors/Suppliers**

Applicable FAR and DFARS clauses are flowed down to our subcontractors. Subcontractors shall be provided the Vetegrity CTIP Policy and asked to certify that they have read and understand the policy.

### **5.0 Questions**

Questions regarding Vetegrity's policy and actions to combat trafficking in persons may be directed to any Vetegrity manager or supervisory personnel.

### **6.0 Reporting Process**

Employees having knowledge of credible information concerning actual or potential violations of this policy must report it immediately. Failure to report actual or potential illegal behavior or

actual or potential violations of this policy may subject employees to disciplinary action, up to and including termination of employment.

Employees may report in good faith and have a responsibility to report without fear of retaliation, any activity that violates the FARs, the DFARS, the Executive Order or the Vetegrity CTIP Policy to their direct supervisor and/or Senior Management. Employees are protected under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9 against reprisal for whistleblowing on trafficking in persons violations.

Employees should consult their direct supervisor and/or Senior Management if they are uncertain whether a specific action would be in violation of the FARs, the DFARS, the Executive Order or the Vetegrity CTIP Policy.

In addition, employees may contact the Global Human Trafficking Hotline at 1-844-888-FREE or via its email address at [help@befree.org](mailto:help@befree.org) or the Department of Defense at <http://www.dodig.mil/hotline/> or toll free at 800-424-9098.

## **7.0 Recruitment and Wage Plan**

To the extent that Vetegrity uses recruitment companies, only recruitment companies with trained employees may be used. No recruitment fees may be charged to the employee and all wages must meet applicable host-country legal requirements, unless variances are documented, explained and approved by Vetegrity Senior Management.

## **8.0 Housing Plan**

Vetegrity does not provide housing. In the unlikely event that Vetegrity is required to provide or arrange housing under a US Government contract, such housing shall meet host-country housing and safety standards.

## **9.0 Procedures to Prevent Agents and Subcontractors from Engaging in Trafficking in Persons and to Monitor, Detect and Terminate**

### **9.1 Agents and Subcontractors**

All agents and subcontractors, as a part of the Vetegrity set-up process to allow payments, are screened against US Government and international denied and debarred party watchlists.

Not less than annually, Vetegrity will require each of its subcontractors to certify:

- 1) Its policies and practices prohibit engaging in the trafficking of persons, the use of forced labor, or the procuring of commercial sex acts in the country or countries in which it conducts business; and
- 2) If applicable, it has implemented a compliance plan to prevent any prohibited activities identified at FAR 52.222-50 (b) and to monitor, detect, and terminate any agent, subcontract or subcontractor employee engaging in prohibited activities; and
- 3) After having conducted due diligence, either
  - a. to the best of its knowledge and belief, neither it nor any of its agents, subcontractors, or their agents is engaged in any such activities; or
  - b. if abuses relating to any of the prohibited activities identified in FAR 52.222-50(b) have been found, the subcontractor has taken the appropriate remedial and referral actions.

4) Has reviewed and understands the Vetegrity CTIP Policy as referenced herein.

As required by the FARs, Vetegrity shall flow down all applicable clauses to its subcontractors and agents.

Failure to comply with the requirements of the FARs is grounds for Vetegrity to take any and all appropriate actions, up to and including immediate termination of that subcontractor's or agent's contract with Vetegrity.

## **9.2 Suppliers**

Vetegrity has made written information on combating human trafficking available to its suppliers. In addition, Vetegrity training for internal personnel includes information on recognizing the signs of human trafficking and the appropriate action to take if human trafficking is suspected and monitors suppliers whenever possible while on supplier premises.

## **10.0 Notification**

Vetegrity shall immediately inform the Contracting Officer and the agency Inspector General upon receipt of credible information alleging a violation of FAR 52.222-50; and any actions taken against a Vetegrity employee, subcontractor, subcontractor employee, or their agent pursuant to FAR 52.222-50. As described above, employees may, in good faith, report, (without fear of retaliation and with employee protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9), any activity that violates the FARs, the DFARS, the Executive Order or Vetegrity's CTIP Policy to their management or to the Global Human Trafficking Hotline or at [help@befree.org](mailto:help@befree.org). Anyone else, including subcontractors, agents, and contingent workers, may also use the hotlines or websites to report any issues relating to human trafficking.

## **11.0 Posting**

Vetegrity's CTIP compliance plan shall be posted at the Vetegrity office and on Vetegrity's website. Vetegrity shall provide its compliance plan to the Contracting Officer upon request.

## **12.0 Certifications**

Prior to contract award and annually after receiving an award, Vetegrity will provide certifications to the contracting officer as required by the FARs.

Prior to award of a subcontract and annually during performance of the contract, Vetegrity shall obtain from each subcontractor a certification as required by the FARs.