



## Applicability

In accordance with FAR 52.222-50(h), SQA has developed this Anti-Human Trafficking Compliance Plan (the “Compliance Plan” or the “Plan”) to be implemented on United States Government contracts or subcontracts for supplies, other than commercially available off-the-shelf items, acquired outside the United States or services to be performed outside the United States and has an estimated value that exceeds \$500,000. The purpose of this Plan is to ensure employees, agents and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations.

## Appropriateness of Plan

This Compliance Plan may be appropriately tailored with respect to the size and complexity of the contract and to the nature and scope of the activities to be performed for the Government, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

## Plan Requirements

### *Awareness Program*

SQA has adopted internal policy entitled “*SQA Policy Against Human Trafficking and Slavery*”, to comply with anti-human trafficking laws and regulations promulgated in the United States and those territories in which the Company operates. This policy also reflects SQA’s *Rules of Engagement*, and *Employee Manual*, which outline standards for business conduct. The *SQA Policy Against Human Trafficking and Slavery* describes prohibited trafficking related activities and the actions that will be taken against employees for violations. Additionally, SQA includes an overview of this policy in quality management system processes relating to the engagement of SQA Associates. Training for such processes, required for all employees involved in Associate Development, provides employees with general information on human trafficking in the supply chain. SQA may also conduct specialized training on corresponding regulations, policy and plan as needed.

### *Process to Report*

Any SQA employees or third party doing work on behalf of the Company are required to report information or knowledge of the actual or potential human trafficking violations to the employee’s supervisor / leader, or Human Resources. Reports may be made anonymously if desired, unless prohibited by local country law.

SQA employees or third party doing work on behalf of the Company may also report violations by contacting the SQA Executive Vice President on +1-310-544-6888.

Retaliation against an individual who reports a violation is strictly prohibited.

### *Recruitment and Wage Plan*

Per the *SQA Policy Against Human Trafficking and Slavery*, SQA permits only the use of trained Associate Development (ADM) employees, prohibits charging recruitment fees to new employees or Associates, and ensures that wages meet applicable host country legal requirements or explain any variance.

### *Housing Plan*

SQA does not provide employee or Associate housing, and therefore has no internal policies to ensure housing meets host country housing and safety standards.



# SQA Anti-Human Trafficking Compliance Plan

## ***Procedures for Agents & Subcontractors***

All SQA agents and subcontractors must agree to comply with the *SQA Policy Against Human Trafficking and Slavery* and all applicable anti-trafficking laws and regulations. SQA shall include FAR 52.222-50 and FAR 52.222-56 in supplier agreements where applicable. SQA agents and subcontractors must have procedures to prevent trafficking in persons and to monitor, detect and terminate any agents, subcontracts or subcontractor employees that have engaged in such activities.

## **Posting**

SQA will post this Plan at the workplace (unless the work is to be performed in the field or not in a fixed location) and on its external website, [www.sqaservices.com](http://www.sqaservices.com). This Plan shall also be made available to the Contracting Officer upon request.

## **Certification**

Annually after receiving an award, SQA will certify to the Government that;

- 1) it has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities and,
- 2) After having conducted due diligence, to the best of SQA's knowledge and belief, neither it nor any of its agents, subcontractors or their agents are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, SQA or its subcontractor has taken the appropriate remedial and referral actions.