



2017 Combat Human Trafficking Plan

American Process, Inc.

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Combat Human Trafficking Policy;

The United States Government has adopted a policy prohibiting trafficking in persons including the trafficking-related activities outlined in paragraphs (1) through (9) below.

In accordance with this United States Government policy, American Process Inc. and its affiliate companies, collectively "API", its employees, and its agents shall not-

- (1) Engage in severe forms* of trafficking in persons during the period of performance of the contract;
- (2) Procure commercial sex acts* during the period of performance of the contract;
- (3) Use forced labor in the performance of the contract;
- (4) Destroy, conceal, confiscate, or otherwise deny access by an employee to the 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 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 cost to be charged to the 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 recruitment fees;
- (7)(i) 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 (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 (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. API 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, API 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 (7)(ii) of this clause apply.

(8) Provide or arrange housing that fails to meet the host country housing and safety standards; or

(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.

In accordance with United States Government, API hereby - (1) Notify its employees and agents of- (i) The United States Government's policy prohibiting trafficking in persons, described in paragraph (1) through (9) above; and (ii) The actions that will be taken against employees or agents for violations of this policy. Such actions for employees may include, but are not limited to, termination of employment; and (2) Take appropriate action, up to and including termination, against employees, agents, or subcontractors that violate the policy in paragraph (1) through (9) above.

* "Severe forms of trafficking in persons," and "commercial sex act," have the meanings given at section 103 of the TVPA, as amended (22 U.S.C. 7102).

Compliance Plan:

In compliance with the United States Government policy prohibiting trafficking in persons, API notifies its employees and agents as follows:

- (i) All employees and agents must familiarize themselves about the Government's policy prohibiting trafficking-related activities, the activities prohibited, and the actions that will be taken against the employee or agent for violations; these are all described in paragraphs (1) through (9) above. Employees and agents are encouraged to seek additional information about Trafficking in Persons and examples of awareness programs that can be found at the website for the Department of State's Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip/> such as Human Trafficking Awareness Training at https://www.dhs.gov/xlibrary/training/dhs_awareness_training_fy12/launchPage.htm
- (ii) Employees may report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons, to the company CEO or COO, or direct to the government hotline phone number of the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org.
- (iii) API's recruitment and wage plan only permits the use of recruitment companies with trained employees, prohibits charging recruitment fees to the employee, and ensures that wages meet applicable host-country legal requirements or explains any variance.
- (iv) When conditions or contract dictate the need to provide or arrange housing, API's housing plan ensures that the housing meets host-country housing and safety standards.
- (v) API will take appropriate measures to prevent agents and subcontractors at any tier and at any dollar value from engaging in trafficking in persons (including activities in paragraphs (1) through (9) above, and to monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in such activities.