



Anti-Trafficking Compliance Plan

Introduction

Dexis has implemented an Anti-Trafficking Compliance Plan (“Plan”) in accordance with the U.S. Government’s zero-tolerance policy regarding human trafficking, FAR 52.222-50(h), USAID Standard Provision for Non-Governmental Organizations M.20 (“USAID Standard Provision”), as well as Dexis’ Anti-Trafficking and Exploitation Policy (Dexis Code of Business Ethics and Conduct 4.5 and HR-POL-003). This Plan was crafted to ensure Dexis’ employees, as well as Dexis’ contractors, subcontractors, suppliers, agents, and other representatives are aware of what kinds of conduct are prohibited under Federal anti-trafficking regulations and laws, as well as the potential consequences of such violation.

This Plan is designed as a standard Plan which presumptively applies to all U.S. Government contracts and subcontracts which have an estimated value exceeding \$550,000, and cooperative agreements, awards, and subawards which have an estimated value exceeding \$500,000, and are for either: (1) supplies, other than commercially available off-the-shelf items, acquired outside the U.S.; or (2) services to be performed outside the U.S. All such contracts, subcontracts, cooperative agreements, awards, and subawards that satisfy these requirements shall be generally referred to as “Contracts” or “Contract” throughout this Plan.

For purposes of this Plan, “employee” means an individual who is engaged in performing work on any project as a direct employee, consultant, or volunteer of Dexis.

Required Review of all Applicable Contracts

All Contracts that meet the requirements set forth above must be reviewed by Dexis’ project staff to assess the risk of trafficking activity. This analysis is based on factors such as the number of non-U.S. citizens to be employed and whether the Contract will involve services or supplies susceptible to trafficking in persons. The assessing staff must modify this Plan as necessary to ensure that it is appropriate to the size and complexity of the Contract, the nature and scope of the activities to be performed, and the assessed risk of trafficking activity.

Employee Awareness Program

Dexis’ Code of Business Ethics and Conduct 4.5 sets forth the Company’s Anti-Trafficking and Exploitation Policy (“Policy”) and reflects Dexis’ zero-tolerance stance towards human trafficking-related activities. The Policy complies with Federal anti-trafficking laws and regulations, as well as the applicable IASC standards against human trafficking. Dexis’ Policy describes the actions Dexis may take against employees, contractors, subcontractors, or agents who violate the Policy, as well as Dexis’ procedure for reporting and investigating any violations under the Policy. Dexis’ Code of Business Ethics and Conduct (“Code”) can be accessed by all employees via Dexis’ company intranet.

All new Dexis employees are required to read and sign a written acknowledgement of the Policy and Code prior to performing work on any applicable projects. Dexis employees are also required to undergo annual training on the Policy and this Plan, as well as Federal anti-

trafficking laws, both at the time of hiring and periodically as needed throughout the term of their work for Dexis.

Housing Plan

If Dexis supplies employees with housing, such housing shall meet host country housing and safety standards.

Recruitment and Wage Plan

Dexis strictly prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees, or when offering employment to potential employees. At all times during the recruitment and hiring process, Dexis employees must fully and accurately disclose all key terms and conditions of employment, which must be provided in a format and language accessible to the potential employee. This includes but is not limited to wages and benefits, work location, living conditions, housing, and associated costs (where provided or arranged by Dexis), any significant costs to be charged to the potential employee, and, if applicable, the hazardous nature of the work. Any person engaged in recruitment or hiring activities on Dexis' behalf is prohibited from making any material misrepresentations regarding the key terms and conditions of employment to any potential employees or candidates.

Dexis, when required by applicable law or contract, will provide every employee being offered a position on an applicable Contract with an employment contract, recruitment agreement, offer letter or other required work documentation containing all required information and key terms about the conditions of employment, including, but not limited to: the work description, wages, work location, living accommodations and associated costs (where being provided or arranged by Dexis), time off, transportation arrangements, grievance process, the content of applicable laws and regulations prohibiting trafficking in persons, and the prohibition on recruitment fees. Such employment contracts, recruitment agreements, offer letters or other required work documentation shall be written in a language the employee understands. If such employee is being required to relocate as part of their employment with Dexis, Dexis will provide any such required work document at least five (5) days prior to the employee's date of relocation.

Dexis prohibits the use of any recruiters that do not comply with local labor laws of the country in which the recruiting takes place. Dexis also prohibits the use of recruiters that do not have trained employees.

Charging recruitment fees to any employee or potential employee is strictly prohibited.

Dexis will pay all employees' wages in compliance with the host-country's applicable legal requirements unless a variance is reasonably necessary, which shall be explained in writing.

Dexis strictly prohibits the use of forced labor for any reason.

Dexis strictly prohibits its employees from engaging in sexually exploitative or abusive acts, or procuring commercial sex acts, which are described and set forth in Dexis' Policy.

Dexis strictly prohibits destroying, concealing, confiscating, or otherwise denying any employee access to his or her identity or immigration documents.

For situations where Dexis employees are performing work on a Contract outside of the U.S.: If an employee is not a national of the country in which the work is taking place and was brought into that country by Dexis for the purpose of working on a Contract covered by this Plan, Dexis

will provide or pay the cost of return transportation to the employee's home country at the end of employment.

For situations where a Dexis employee who is not a U.S. national and was brought by Dexis into the United States for the purpose of working on a Contract covered by this Plan, Dexis will provide or pay such employee's cost of return transportation at the end of their employment, if payment of such costs are required under existing temporary work programs or pursuant to a written agreement with said employee.

Reporting Requirements and Procedure

All Dexis employees and contractors, subcontractors, agents, suppliers, and their personnel are **required** to report any suspected trafficking-related activity or violation of the Policy or this Plan to Dexis. These reports can be directed to Dexis' Vice President of People and Culture, Laura Dabkowski; the reporting person's supervisor or manager; or, if the reporting person wishes to remain anonymous, online via www.lighthouse-services.com/dexisonline, or from within the U.S. by phone at 800-603-2869. Employees outside the U.S. can submit anonymous claims via the Lighthouse website above.

Additionally, any Dexis employee, contractor, subcontractor, agent, supplier, or their personnel may also make a report by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

If Dexis receives credible information alleging an employee has engaged in prohibited trafficking-related activity, Dexis will conduct an investigation and report its findings and determine what, if any, remedial action is appropriate. Dexis will immediately notify the contracting officer (or agreement officer, if applicable) and the appropriate agency's Inspector General of the report received as well as any resulting remedial action taken. When required under the USAID Standard Provision, Dexis will also immediately notify the USAID Office of the Inspector General of any such reports and any resulting remedial action.

Dexis will fully cooperate with any U.S. Government agency or authorities responsible for any investigations, audits, or corrective actions relating to human trafficking, which shall include but is not limited to providing timely and complete responses to document requests and providing reasonable access to Dexis' staff and premises.

Dexis strictly prohibits any retaliation or attempts to retaliate against anyone who reports a violation under the Policy or this Plan. Dexis will protect all employees suspected of being victims of, or witnesses to, any prohibited human trafficking activities, at all times prior to the employee's return to the country from which they were recruited. Dexis will not prevent or hinder these employees from cooperating fully with U.S. government authorities.

Contractor Compliance

All Dexis contractors, consultants, vendors, suppliers, subcontractors, and their personnel ("Contractors") must agree to comply with the Policy and all applicable Anti-Trafficking laws and regulations. Dexis will include language to such effect in all applicable contracts or subcontracts with such Contractors, and shall insert language pursuant to FAR 52.222-50, FAR 52.222-56 and the USAID Standard Provision when applicable.

When applicable, Dexis Contractors must have a compliance plan of their own in place that is designed to prevent all prohibited trafficking-related activities and to monitor, detect and terminate any of their own employees, agents, contractors, consultants, suppliers,

subcontractors, or subrecipients engaged in prohibited trafficking-relating activities. The Contractor's compliance plan must meet the minimum requirements set forth under applicable Federal law, as well as this Plan.

Prior to Dexis awarding an applicable contract or subcontract to a Contractor, the Contractor must first provide Dexis with a copy of their compliance plans as well as a certification that:

- The Contractor has implemented a compliance plan in accordance with Federal law and regulations;
- The Contractor is in compliance with its own compliance plan;
- The Contractor has completed its due diligence, which has led Contractor to conclude that neither it nor any of its employees, or its contractors, consultants, suppliers, subcontractors, subrecipients or their employees, have engaged in any prohibited trafficking-related activities; or, if any abuses relating to prohibited trafficking-related activities were discovered, Contractor has taken appropriate remedial and referral actions and terminated its relationship with the offending persons or entities.

Once a contract has been awarded to a Contractor, the Contractor is also required to annually re-certify to Dexis its compliance with the above, as well as any updated compliance plans.

When appropriate under the circumstances, Dexis has the right to inspect the Contractor's workplace or location of work being performed, as well as any Contractor-provided housing, for signs of any prohibited trafficking-related activities.

If a Contractor fails to comply with the Policy, this Plan, or the applicable Federal anti-trafficking laws and provisions, Dexis will take all appropriate and necessary actions to remedy the current violation and mitigate the risk of future violations. Dexis has the right to demand Contractor remove or terminate any violating agent, employee, subcontractor, consultant, or supplier; suspend payments to the Contractor until the violation is remedied; or terminate any contract, agreement, or subcontract with said Contractor.

Certification

Annually after receiving an award, Dexis will provide the U.S. Government with certification that:

1. Dexis has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, contractor, supplier, subcontractor or their employee or agent engaged in any prohibited activities and;
2. After completing the necessary due diligence and to the best of Dexis' knowledge and belief, neither Dexis nor any of its agents, contractors, suppliers, subcontractors or their employees or agents are engaged in prohibited human trafficking activities; or, if abuses related to any of the prohibited trafficking activities were found, Dexis or its agent, contractor, supplier, or subcontractor has taken the appropriate remedial and referral actions.