

Combating Trafficking in Persons Compliance Plan

ideas42 has a zero-tolerance policy regarding trafficking in persons and opposes any form of prostitution and related activities because these activities are inherently harmful, dehumanizing, and contribute to human trafficking.

No employee nor any ideas42 consultant, contractor, subcontractor, vendor or supplier shall be involved in the following activities: trafficking in persons, soliciting or obtaining prostitution or any commercial sex act or using debt bondage, slave, forced or child labor. If any employee is found to have engaged in such behavior, ideas42 will take an appropriate employment action, up to and including termination.

ideas42 fully supports the United States Government's policy prohibiting trafficking in persons, which prohibits contractors, contractor employees, and their agents from:

1. Engaging in severe forms of trafficking in persons during the period of performance of the contract;
2. Procuring commercial sex acts during the period of performance of the contract;
3. Using forced labor in the performance of the contract;
4. 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;
5. (i) Using 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) Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
6. Charging employees recruitment fees;
7. (i) Failing 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 to work 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 to work 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 (b)(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 (b)(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. The contractor 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, the contractor 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 (b)(7)(ii) of this clause apply.

8. Providing or arrange housing that fails to meet the host country housing and safety standards; or

9. If required by law or contract, failing 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.

Furthermore, ideas42 has notified its employees that they must report any activity inconsistent with the United States Government's policy prohibiting trafficking in persons and advised them that they may report the violation by contacting a Director at ideas42 or the Global Human Trafficking Hotline at 1-844-888-FREE or the Global Human Trafficking email address at help@befree.org.

No reprisals or disciplinary action will be taken or permitted against employees for good faith reporting or cooperating in the investigation of illegal acts or violations of this policy. It is a violation of this policy for any ideas42 employee to punish or conduct reprisals against another employee for making a good faith report or cooperating in the investigation of illegal acts or violations of the TIP Policy. Employees who violate the policy or commit illegal acts are subject to disciplinary action up to and including termination. Employees who report their own illegal acts or improper conduct, however, will have such self-reporting taken into account in determining the appropriate disciplinary action.

ideas42 will monitor its agents and subcontractors from engaging in trafficking in persons (including activities in paragraph (b) of this clause) and terminate any agents, subcontracts, or subcontractor employees that have engaged in such activities.