



Policy Concerning U.S. FAR 52.222-50 Combating Trafficking in Persons

Integrated Procurement Technologies (IPT) is opposed to human trafficking and forced labor in any form. Human trafficking is illegal under U.S. and California Laws and a violation of IPT's values. IPT's policy against trafficking of persons applies to all IPT divisions and departments.

The U.S. Government and the State of California have zero-tolerance policies against trafficking in persons and legally forbids Government employees, contractor personnel or their agents from engaging in any form of trafficking in persons. Persons involved in human trafficking may be subject to criminal prosecution under U.S. Federal and State Laws.

IPT complies with all applicable regulations regarding Combating Trafficking in Persons, including at least FAR 52.222-50 Combating Trafficking in Persons for Federal, State or Local agency funded contracts.

What is Human Trafficking?

Human trafficking is the recruitment, harboring, transportation, provision or obtaining of a person for labor or services through the use of force, fear, fraud, deceit, threat, duress, peonage, debt bondage, slavery, sex trafficking or coercion for the purpose of subjection to involuntary servitude (Based on FAR 52.222-50(a) and California Penal Code 236.1).

How does this affect IPT employees, agents, and suppliers?

The requirements of FAR 52.222-50(h) state that government funded acquisitions for NON-COTS (Commercial-Off-The-Shelf) supplies to be acquired outside the United States or services to be performed outside the United States and have an estimated value over \$500,000 may require implementation of a Compliance Plan.

When IPT receives a contract from the Federal or State Government, whether received directly or through a prime contractor, IPT is required to prohibit its employees, agents, and suppliers from:

- Engaging in trafficking in persons during the period of performance of the award.
- Procuring a commercial sex act during the period of performance of the award.
- Using forced labor in the performance of the contract or subcontract under this agreement.



Based on the requirements, IPT must notify all employees, contractors and agents working under the award of the U.S. Government's zero tolerance policy regarding trafficking in persons and the actions that will be implemented for violation of this policy. Such actions may include but are not limited to removal from the contract, reduction in benefits, or termination of employment.

IPT is required to immediately report any information they received from any source that alleges an employee or subcontractor employee has violated the policy. IPT's management will work with law enforcement as required in order to take any appropriate actions up to and including termination of employees, agents or suppliers that violate the policy.

All IPT employees are expected to report any credible information regarding human trafficking incidents by notifying Human Resources who will take the appropriate steps both internally and/or with the authorities if necessary.

Please note the following references for additional information:

- FAR 52.222-50 Combating Trafficking in Persons
- 2 CFR Part 175: Award Terms for Trafficking in Persons
- 22 USC Chapter 78: Trafficking Victims Protection
- State of California Human Trafficking Penal Code 236.1