

## Combating Trafficking in Persons Compliance Plan

Created: November 20, 2019

Revised: 12/15/2022

## **1. Commitment Statement**

DCX-CHOL Enterprises Inc. is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. DCX-CHOL Enterprises Inc. will not tolerate or condone human trafficking or slavery in any part of our organization. This policy is consistent with DCX-CHOL Enterprises Inc.'s Code of Ethics and Business Conduct.

DCX-CHOL Enterprises Inc. employees, contractors, subcontractors, vendors, suppliers, partners, and others through whom DCX-CHOL Enterprises Inc. conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

To comply with FAR 52.222-50, all applicable businesses engaged in a contract with the US Government must develop a Compliance Plan to ensure such mitigation of risks.

## **2. General**

DCX-CHOL Enterprises Inc. strictly prohibits contractors, subcontractors, vendors, suppliers, partners, and others through whom DCX-CHOL Enterprises Inc. from engaging in human trafficking-related activities. These activities include: engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

DCX-CHOL Enterprises Inc. also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including:

- Destroying or otherwise denying access to an employee's identity or immigration documents;
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment;
- Using recruiters that do not comply with local labor laws;
- Charging employees recruitment fees;
- Failing to provide return transportation to certain employees who are brought to a country for the purpose of working on a U.S. Government contract;
- Providing housing that fails to meet host country standards; and
- Failing to provide an employment contract or work document where required by law.

### **3. Training**

DCX-CHOL Enterprises Inc. has developed and will continue to develop and maintain training modules that support our commitment to human rights, including child or forced labor, trafficking of persons, and adherence to labor laws. Also, including adherence to truthful and trustworthy practices during the recruitment of employees or offering of employment, proper disclosure of information, and proper representations during the recruitment process to include key terms and conditions of employment, wages, fringe benefits, work location, and nature of work.

As this program evolves, employees must read this policy and affirm their understanding. Should an employee be unsure of what to do in a particular situation or for guidance on any aspect of the policy, they should consult their manager, Human Resources, for guidance on the policies, procedures, or the law

### **4. Certifications of Suppliers and Subcontractors**

DCX-CHOL Enterprises Inc. requires its suppliers to comply with all applicable laws, regulations, and standards in every country in which they operate. Also, suppliers are required to conduct business in a manner that respects human rights and complies with applicable laws and internationally recognized human rights standards, including not engaging in human trafficking, or using forced, involuntary, or child labor in any form.

DCX-CHOL Enterprises Inc. expects its suppliers to promptly notify us of any violation or suspected violation by reporting the matter to the supplier's business contact at DCX-CHOL Enterprises Inc.

To the extent applicable, DCX-CHOL will include FAR 52.222-50 information in all subcontracts and in all contracts with suppliers. If any subcontractor is required by FAR 52.222-50 to submit a certification, the DCX-CHOL will require submission of the required certification prior to the award of the subcontract and annually thereafter.

### **5. Mandatory Reporting Requirements**

Employees having knowledge of credible information concerning actual or potential violations of this policy must report them immediately to Human Resources at 310-516-1692 Ext. 111 or the Whistleblower Hotline [WB Inbound] Number: 310-359-6023. Timeliness of reporting any suspected violation is critical as the U.S. Government has imposed an especially stringent reporting obligation when there is credible information of violations. Failure to report actual or

potentially illegal behavior or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment.

Any person who receives reports of possible violations under this policy must notify Corporate Human Resources immediately. When making a report, employees are encouraged to share as much information as possible so that appropriate action can be taken. If the employee does not feel comfortable reporting this information internally, they should contact the National Human Trafficking Hotline at 1-888-373-7888 or via email [help@befree.org](mailto:help@befree.org).

### ***6. Non-Retaliation Policy***

DCX-CHOL Enterprises Inc. companies do not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or governmental audit or investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, which could include termination of employment.

### ***7. Violations of this Policy***

If DCX-CHOL suspects that an employee, contractor, subcontractor, supplier, vendor, or any other company agent has violated this policy, DCX-CHOL will immediately investigate and, at its sole discretion, take appropriate action(s) against those who violate this policy. Such actions include, but are not limited to: termination of the agreement or contract, removal from the contract, reduction in benefits, and disciplinary action up to and including termination of employment. DCX-CHOL may also refer the matter to law enforcement.

Finally, any job applicants who violate this policy will not be hired to work at the DCX-CHOL. Failure to report actual or potentially illegal behavior or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment. DCX-CHOL requires employees who perform work under a United States Government contract to confirm that they know and understand each of the above items.

### ***8. Display of Information***

DCX-CHOL Enterprises Inc. prominently displays FAR 52.222-50 Combating Trafficking in Persons posters, including making available the phone number of the National Human Trafficking Hotline (US) 1-888-373-7888 should any violations need to be reported. A copy of this plan will be placed on DCX-CHOL Enterprises Inc.'s external website <https://www.dcxchol.com> and will be provided to contractors, suppliers, and agents if deemed necessary.



# Acknowledgment Statement

<b>SUBJECT/PROCEDURE:</b> <i>Combating Trafficking in Persons Compliance Plan</i>		<b>DATE:</b>
<b>TRAINER:</b>		<b>LOCATION:</b>

**EMPLOYEE ACKNOWLEDGMENT:**

My signature herein is to acknowledge that I have received training as indicated above. I have received a copy of the training notes for the Combating Trafficking in Persons Compliance Plan. I have received information regarding the company’s confidential Whistleblower Hotline. I attest that I understand the training that I have received and feel comfortable with the information.

(PRINT NAME)	(SIGNATURE)	(DATE)