

O2 Impact Anti-Trafficking Compliance Plan

Background and Purpose

The QED Group, LLC, DBA Q2 Impact (Q2) finds any form of human trafficking as abhorrent and employs business practices and standards that demonstrate its commitment to the dignity of any individual with which the company interacts. Further, Q2 has a zero-tolerance policy for individuals who engage in human trafficking, as detailed in Q2's Code of Conduct. As a supplement to Q2's code of conduct, it has developed this Anti-Trafficking Compliance Plan (Plan) in accordance with the U.S. Government regulation and policies as detailed in FAR 22.17, FAR 52.222-50, and USAID Standard Provision M20 for U.S. Nongovernmental Organizations.

The purpose of the Plan is to detail Q2's policies and procedures for: (1) ensuring Q2 employees are aware of prohibited conduct, and disciplinary actions for violations of, Q2 policy and the relevant U.S. Government policies and regulations; (2) employing fair recruitment, wage and housing practices; and (3) preventing prohibited trafficking activity by vendors, suppliers, subcontractors and subrecipients, and properly monitoring, detecting and terminating those engaging in such activities.

Applicability

The Plan defines Q2's standards for anti-trafficking compliance and applies to all U.S. Government contracts, subcontracts, cooperative agreements, awards and subawards.

Employee Awareness Program

Q2 has adopted a Combating Trafficking in Persons Policy (Policy) reflecting Anti-human trafficking that reflects the Anti-Trafficking Provisions' provisions prohibiting trafficking-related activities, describes the actions Q2 may take against employees and agents who violate the Policy, and sets out the procedure for reporting and investigating Policy violations. The Policy is included in Q2's Code of Business Ethics and Conduct (Code).

Q2 posts the Code on the Employee Page of its internal SharePoint site, where it can be accessed by all Q2 staff at any time.

All new staff are required to read and acknowledge the Code at the time of hire and must also complete a training on the Code, including its anti-trafficking provisions.

Q2 also periodically conducts periodic training on the Anti-Trafficking Provisions, the Code and the Compliance Plan on an as-needed basis.

Recruitment and Wage Plan

Q2 maintains a recruitment and wage plan that ensures labor is not bonded, forced, compulsory, or otherwise against the will of the employee. All employment terms are agreed to voluntarily, without threat or deception, by workers who enter into employment freely.

Q2 only permits the use of recruiters that have professionally trained employees, who are compliant with all labor laws of the country where the recruitment takes place.

Q2 prohibits charging recruitment fees to any employee or potential employee.

All employee wages paid by Q2 shall meet applicable host-country legal requirements, or any variance must be explained.

Q2 prohibits the confiscation, destruction, concealment, or denial to any employee access to his or her identity or immigration documents.

Q2 will provide or pay the cost of return transportation at the end of employment for any employee who is not a national of the country where the work took place and was brought into that country by Q2 for purposes of working on a covered U.S. Government contract or award.

Housing Plan

Should Q2 provide or arrange housing, the housing will meet host country housing and safety standards.

Subcontractor and Subawardee Compliance

All Q2 contractors, consultants, vendors, suppliers, subcontractors and subrecipients must agree to comply with the Policy and all applicable Anti-Trafficking Provisions. Q2 will include language to that effect in all contracts, subcontracts and subagreements, including inserting FAR 52.222-50, FAR 52.222-56 and USAID Standard Provisions where applicable. Any applicable contractor, consultant, vendor, supplier, subcontractor, or subrecipient must maintain a compliance plan to prevent prohibited trafficking-related activities and to monitor, detect and terminate any of its contractors, consultants, vendors, subcontractors or subrecipients engaging in prohibited trafficking-relating activities, a copy of which will be provided to Q2 upon request.

As a part of all applicable contracts and awards, and on an annual basis thereafter, any applicable contractor, consultant, vendor, supplier, subcontractor, or subrecipient must submit a certification to Q2:

- That the Supplier has implemented a compliance plan and has complied with its plan such a compliance plan; and
- That after conducting due diligence, to the best of the Supplier's knowledge and belief, 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 have been found, Supplier has taken appropriate remedial and referral actions.

If any Supplier fails to comply with the Policy or applicable Anti-Trafficking Provisions, Q2 will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

- Requiring the contractor, consultant, vendor, supplier, subcontractor, or subrecipient to remove an employee or agent from a project

- Requiring the contractor, consultant, vendor, supplier, subcontractor, or subrecipient to terminate its relationship with any contractor, consultant, vendor, supplier, subcontractor, or subrecipient
- Suspending payments until violation is remedied
- Immediately terminating the contract or agreement

Reporting Requirements and Procedure

All Q2 staff as well as all contractor, consultant, vendor, supplier, subcontractor, and subrecipient staff are required to report any suspected trafficking- related activity or violation of this policy to Q2. Reports may be made via Q2's anonymous compliance hotline (+1-703-678-4777), by email at ethics@q2impact.com, or by anonymous reporting website at <https://www.q2impact.com/ethics-and-integrity-form>. In addition, reports may be made to any Q2 supervisor, senior leadership team member, or HO HR representative. Any such report is required to immediately forward the report to Q2's Senior Director of Finance and Compliance.

Q2 staff and contractor, consultant, vendor, supplier, subcontractor, and subrecipient staff who believe they or others have been subjected to prohibited trafficking-related activities may report the activity as outlined above or may contact the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

Human Resources will investigate all reports of prohibited trafficking-related activity or violations of the Code, taking appropriate action. The Office of Compliance will make all required notifications to government agencies.

Q2 strictly prohibits retaliation against any Q2 employee who reports prohibited trafficking- related activity or other violations of the Code. Further, Q2 prohibits retaliation for cooperation with any internal or government investigations of such reports. Q2 staff who engage in any form of retaliation against those who report trafficking-related activities or other violations of the Code are subject to disciplinary action, up to and including termination of employment with Q2.

Investigations

If Q2 receives credible information from an employee report or any other source alleging prohibited trafficking-related activity, the Q2 Office of Compliance will conduct an investigation and report its findings and determine what, if any, action is appropriate.

The Q2 Office of Compliance will be responsible for immediately notifying the contracting or agreement officer and the appropriate agency Inspector General of the information received and any resulting action taken.

Q2 will cooperate fully with any U.S. Government agencies responsible for any investigations, audits or corrective actions related to trafficking in persons.

Posting

Q2 will post this Plan on its internal SharePoint page and on its website www.q2impact.com. Q2 will also

post this Plan and reporting information at all workplaces, except where the work is being performed at a non-fixed location.