

Human Trafficking Compliance Plan

Purpose

Ages Build is opposed to human trafficking in all forms and is supportive of the US Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons (hereafter referred to as FAR 52.222-50) to combat human trafficking, and will ensure the risk of such practices is mitigated within the business.

FAR 52.222-50 prohibits US Government contractors and their agents from engaging in any severe form of trafficking in persons, defined to mean the recruitment, harbouring, transportation, provision or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, debt bondage or slavery and sex trafficking. To comply with FAR 52.222-50 all applicable businesses engaged in contract with the US Government must develop a Compliance Plan to ensure such mitigation of risks.

Applicability

The Ages Build Human Trafficking Compliance Plan only applies within the business to contracts or subcontracts with the US Government for supplies (other than commercially available off-the-shelf items) or services, acquired or performed outside of the US with an estimated value that exceeds US \$500,000.

The plan is to be adhered to by employees, suppliers, contractors, subcontractors, subcontractor employees and agents of Ages Build, including subsidiaries and joint ventures controlled by Ages Build, performing work under a US federal government contract.

Plan Constraints

According to FAR 52.222-50, a Compliance Plan must be appropriately tailored to the size and complexity of the US Government contract, and to the nature and scope of the activities to be performed. The Ages Build Human Trafficking Compliance Plan outlines compliance with FAR 52.222-50.

Ages Build reserves the right to review and further develop its Human Trafficking Compliance Plan should the nature and complexity of its contracts with the US Government change.

Compliance Plan

Awareness Training

The Human Trafficking Awareness Training is conducted on an as needed basis. Training materials are available to contractors on request.

Risk Assessment

A [risk assessment](#) is conducted as part of the Ages Build Annual Risk Review process to assess the risk to the business in relation to FAR 52.222-50. If it is identified that a supplier falls within the requirements a risk assessment on the supplier may be conducted.

Recruitment / Wages

- Ages Build strictly prohibits misleading or fraudulent recruiting practices during recruitment.
- Ages Build conducts its own recruitment activities that ensuring that these activities adhere to all domestic policies and standards to combat trafficking in person.
- Ages Build adheres to the requirements of the Modern Slavery Act of 2018 as detailed in our [Modern Slavery Policy](#)
- Ages Build follows the guidelines detailed in the Australian Government's [National Action Plan to Combat Human Trafficking and Slavery 2015–19](#)
- Ages Build pays all employees wages that meet Australian legal requirements.
- Ages Build provides an employment contract or other required work document containing all required information about the terms of conditions of employment will be provided to the employee.
- Ages Build only employs those with the right to work in Australia as demonstrated by:
 - Citizenship of Australia or New Zealand

- Permanent Residency
- An appropriate Work Visa as defined by the [Department of Home Affairs](#)

Housing

Ages Build does not provide housing.

Procedure for Contractors, Suppliers and Agents

The requirement to adhere to FAR 52.222-50 is mandatory to all contractors, suppliers and agents Ages Build engages with. This requirement is to be flowed down to all sub-tier contractors, suppliers and agents who engage in business indirectly with Ages Build. The substance of FAR 52.222-50 will be included in subcontracts and in contracts with agents. However, requirements for a Compliance Plan apply only to any portion of the subcontract that meets the same prime contractor thresholds. Contractors, suppliers and agents with a Compliance Plan in place must submit certification upon award of contract and on an annual basis thereafter.

Ages Build requires contractors, suppliers and agents to comply with all applicable local, state and national government laws and regulations of the local region they are conducting operations in. Upon request, information will be made available to all contractors, suppliers and agents on combating human trafficking including copies of this plan and internal training materials.

Ages Build reserves the right to take appropriate action and remedies/ referrals if a problem arises, and to terminate any contract should a report of violation be substantiated.

Process for Reporting Violations

Should employees or contractors, suppliers and agents be unsure as to whether a specific action would be a violation of FAR 52.222-50, they should consult any member of Ages Build's Leadership Team.

All employees or contractors, suppliers and agents are required to report information or knowledge of human trafficking internally to a member of the Leadership Team in the first instance. If the employee does not feel comfortable reporting this information internally, they are able to contact the Global Human Trafficking Hotline at 1-844- 888-FREE or via email help@befree.org. Retaliation against an individual who has reported a violation will not be tolerated.

Certification

If applicable, after receiving an award, and annually thereafter, or for the length of the contract, Ages Build will certify that it has a Compliance Plan in place, has conducted due diligence and has acted on any violations found. Certification for contractors, suppliers and agents that meet the threshold will also be requested at this time.

Further Information

All employees and contractors are encouraged to come forward to discuss the topic of Human Trafficking, or a perceived or actual violation, at any time. For further information not covered in this plan please contact a member of Ages Build's Leadership Team.