



Combating Trafficking in Persons Compliance Plan

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Table of Contents

Table of Contents	i
Combating Trafficking in Persons Compliance Plan	ii
Compliance	ii
Violations	iii
Reporting	iii
Awareness	iii
Recruitment and Wage Plan	iv
Supplier and Subcontractor Supplier	iv
Plan Assessments	iv
Certification	iv

Combating Trafficking in Persons Compliance Plan

The Ergo Group Inc. (The Ergo Group) does not tolerate forced or involuntary labor in any form. Understanding the importance of eradicating trafficking in persons as not only is it a human rights violation. As a sub-contractor from an awardee of US Government funding through USAID/Mexico, The Ergo Group has developed the following Combating Trafficking in Persons Plan to ensure compliance with US Federal Acquisition Regulation 52.222-50 ("FAR 52.222-50").

Compliance

The Ergo Group does not engage in the following practices under any circumstances:

- a. Trafficking in persons, as defined in the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Transnational Organized Crime).
- b. Procurement of a commercial sex act during the period of performance of the award/contract.
- c. Use of forced labor in the performance of the award/contract.

The Ergo Group does not engage in any kind of act that directly supports or advances trafficking in persons, including the following acts:

- d. Destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents.
- e. Failing to provide return transportation or pay for return transportation costs to an employee from a country outside the United States to the country from which the employee was recruited upon the end of employment if requested by the employee, unless:
 - a) exempted from the requirement to provide or pay for such return transportation by a specific contractual provision agreed upon by both parties; or
 - b) the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
- f. Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment.
- g. Charging employees or potential employee's recruitment fees.

- h. Providing or arranging housing that fails to meet the host country housing and safety standards.

The Ergo Group identifies slave labor and human trafficking by the common deprivation of a person's liberty by another to exploit them for personal or commercial gain. The Ergo Group is committed not to tolerate modern slavery while conducting business. This principle applies to all persons working for Th Ergo Group or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

Violations

The Ergo Group will take appropriate action, up to and including termination, against personnel that violate these Principles.

Reporting

All Employees are required to report any activity inconsistent with this Policy, with the assurance that there will be no retaliation or other negative consequences for persons acting in good faith. Any credible information received from any source that any The Ergo Group personnel has violated FAR 52.222-50 must be reported immediately to:

Ivonne Bustani

Chief of Staff and Compliance Officer

Phone: +1.510 508 5433

Ivonne.bustani@theergogroup.com

Alternatively, Employees may also report a violation as set forth in the Code or by contacting one of the following hotlines:

- The hotline phone number of the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org.
- The US National Human Trafficking Hotline at 1-888-373-7888 or text 233733.

Awareness

The Ergo Group will inform Employees about the Policy, including prohibited conduct, consequences of violations, and mechanisms to report suspected violations by posting relevant contents of this Plan, no later than the initiation of Contract performance, at its workplace, on its website, and/or on an internal SharePoint site.

Recruitment and Wage Plan

The Ergo Group prohibits charging recruitment fees to the Employees or potential Employees; and it will ensure that all wages meet applicable legal requirements.

Supplier and Subcontractor Supplier

The Ergo Group requires its suppliers and subcontractors to certify compliance with all applicable laws, regulations and standards in every country in which they operate, and 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.

Plan Assessments

The Ergo Group will periodically review and assess this Plan. Modifications will be implemented as required.

Certification

I certify that the Ergo Group Inc. has a Compliance Plan in place to prevent the trafficking in persons.



Héctor Cárdenas

President and CEO

The Ergo Group