

Anti-Trafficking Compliance Plan

1. Purpose

- 1.1 In accordance with FAR 52.222-50(h), General Dynamics Information Technology (“GDIT”) has developed this Anti-Trafficking Compliance Plan (the “Compliance Plan” or the “Plan”) to be implemented for each U.S. Government contract or subcontract that is for supplies, other than commercially available off-the-shelf items, acquired outside the U.S., or services to be performed outside the U.S., that exceeds \$550,000 in value. The purpose of this Plan is to ensure that employees, agents, and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations. The Plan also includes terms for recruitment, wages, and housing, as well as procedures to prevent employees, agents and subcontractors at any tier from trafficking in persons.

2. Tailoring of Plan

- 2.1 This Compliance Plan (or its implementation) may be sufficiently tailored with respect to the size and complexity of the particularity contract under which the employees will work; and to the nature and scope of the activities to be performed for the Government, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

3. Employee’s Rights Under This Plan

- 3.1 GDIT will provide to employees and agents, at least five days prior to any relocation, an overseas assignment letter, written in a language understandable by the employee, that will include, but is not limited to, the following information: wages and fringe benefits; location of work; living conditions; housing and associated costs, if provided or arranged; any significant costs to be charged the employee; and hazardous nature of the work, if applicable.
- 3.2 Employees have the right to ask for clarification of any employment terms they do not understand. GDIT will require employees or agents to be presented with and expressly agree to the terms of their employment.
- 3.3 GDIT will provide all employees and agents a copy of the Compliance Plan, prior to the commencement of their assignment. Additional details regarding GDIT’s policies and procedures related to anti-trafficking can be found in GDIT Legal Policy LEG-POL-G-12, *Combating Trafficking in Persons*, and Human Resources Policy HR-POL-401. Both policies

can be found at GDIT's internal website, Connect. GDIT's Legal and HR Policies provide more detailed information regarding the following:

Recruitment: GDIT permits only the use of recruitment companies with trained employees and requires recruiters to comply with local labor laws and to provide potential employees and agents with accurate information pertaining to their employment, includes their duties, hours of work, location of work, wages, housing/living conditions, costs to be charged the employee, and any hazardous nature of the work, at least five days prior to any relocation. GDIT prohibits charging employees recruitment fees.

Wages: GDIT requires wages to meet applicable host-country legal requirements or explain any variance.

Housing: If housing is provided by GDIT, it must meet host-country housing and safety standards.

Identity Documents: GDIT strictly prohibits destroying, concealing, confiscating or otherwise denying access to employee identity or immigration documents.

Transportation Costs: GDIT must provide return transportation at the end of employment for employees brought to a non-U.S. country for the purpose of working on a U.S. government contract. For trafficking victims or witnesses seeking redress in the country of employment, GDIT must provide transportation costs in a manner that does not obstruct such redress or witness activity. Non U.S. nationals brought to the U.S. may also qualify for return transportation costs. An employee may refuse return transportation costs if legally able to stay in the country. GDIT may opt to either provide or pay for transportation, based on GDIT's established policies and procedures, as well as the modes and costs of transportation available. Employees who are terminated for cause or who desire to leave prior to completion of the contract are still entitled to these costs, if they would otherwise qualify for them.

Reporting: GDIT has provided several easy and retaliation-free means of reporting suspected trafficking activity set forth in Section 5 of this Plan below. Such reporting is a critical tool to assist GDIT in monitoring and detecting any trafficking violations. GDIT must immediately notify appropriate Government officials of any credible information regarding suspected trafficking activity. Such reporting by the Company will be coordinated through the GDIT Legal Department.

- 3.4 As part of the overseas assignment package, GDIT employees will be required to confirm that they have read and understood the Compliance Plan and agree to abide by its terms by

executing GDIT's Employee and Agent Certification — Combating Trafficking in Persons (LEG-FORM-G-12B). To the extent GDIT has engaged an agent to assist the Company in securing or performing the work, such agent will also be subject to this Plan and must execute the Certification referenced above.

4. Violations

- 4.1 Violations of GDIT's anti-trafficking policies or this Compliance Plan by any GDIT employee (or agent) may result in disciplinary action up to, and including, removal from the contract, suspension or debarment of the employee or agent from further Government contracting, and suspension or termination of employment (or termination of the agreement with the agent). Violations may also result in serious ramifications to the Company, including a negative entry into FAPIIS, non-exercise of an option period, contract termination, suspension of contract payments, loss of the Company's award fee under the contract, or suspension or debarment.

5. Reporting Violations Under This Plan

- 5.1 GDIT is committed to providing a safe and easy means of reporting suspected trafficking activity. All GDIT employees and agents are required to report, anonymously if preferred, any suspected trafficking-related activity through any of the following means:

- **To the GDIT Legal Department**

General Dynamics Information Technology
Attn: Donald P. Creston, Associate General Counsel
3150 Fairview Park Drive
Falls Church, VA 22042
Email: Donald.creston@gdit.com
Phone: 703-995-1982

- **To the GDIT Anti-Trafficking Compliance Officer**

General Dynamics Information Technology
Attn: Ryan Brown
International Human Resources Department
3150 Fairview Park Drive
Falls Church, VA 22042
Email: Ryan.brown1@gdit.com
Phone: 703-995-3725

- **To the GDIT Ethics Officer**

General Dynamics Information Technology
Attn: Laura Davis
3150 Fairview Park Drive
Falls Church, VA 22042
Email: Laura.Davis@gdit.com
Phone: 703-995-4990

- **To the General Dynamics Helpline**

1-800-433-8442 (or from outside the U.S. toll-free at 503-619-1815)
Email: www.gd.ethicspoint.com

- **To the Global Human Trafficking Hotline**

Website: humantraffickinghotline.org
Phone: 1-888-373-7888

- 5.2 GDIT has an obligation to protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and shall not prevent or hinder the ability of these employees from cooperating fully with Government authorities.
- 5.3 If GDIT is made aware of any credible information from any source pertaining to a suspected trafficking violation, GDIT will investigate such allegations, take appropriate remedial measures, and immediately notify the contracting officer and the appropriate agency Inspector General (IG) of that information, as well as what action it has taken with respect to the allegation.
- 5.4 GDIT will fully cooperate with any Federal agency conducting an audit or investigation of potential anti-trafficking violations, including providing timely responses to Government investigators and providing reasonable access to facilities and staff.

6. Subcontractor Compliance and Monitoring

- 6.1 GDIT's subcontractors must comply, where applicable, with the anti-trafficking requirements detailed in FAR Subpart 22.17, FAR 52.222-50, FAR 52.222-56, DoD FAR Supplement ("DFARS") and DFARS Procedures, Guidance, and Information ("PGI") 222.17, DFARS 252.203-7004(c)-(e); DFARS 252.222-7007, and DFARS 252.222-7040(d)(8).

- 6.2 Failure to comply with the requirements of any anti-trafficking law or regulation will result in swift action by GDIT, up to and including immediate termination of any subcontract with GDIT, as well as potential suspension and debarment by the Government.
- 6.3 Pursuant to FAR 52.222-50(h) and (i), if a GDIT subcontractor is required to submit a certification of compliance, it must provide GDIT with a copy of its anti-trafficking compliance plan and any implementing policies when requested, and, prior to subcontract award, certify that it has implemented a compliance plan to prevent any prohibited activities in FAR 52.222-50. It must also certify that it will monitor, detect, and terminate any agent, subcontract or subcontractor employee engaging in prohibited activities, and, after having conducted due diligence, either (a) to the best of the subcontractor's knowledge and belief, neither it nor any of its agents, subcontractors, or their agents is engaged in any such activities; or (b) if abuses relating to any of the prohibited activities have been found, the subcontractor, or its lower-tier subcontractor, has taken the appropriate remedial and referral actions.
- 6.4 Subcontractors' compliance plans must meet the minimum requirements in FAR 52.222-50(h), and be sufficiently tailored with respect to the size and complexity of the contract under which employees will work, and to the nature and scope of the activities to be performed for the Government, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.
- 6.5 GDIT will monitor subcontractors' conduct based on the risk of trafficking in persons related to the particular product or service being acquired.
 - 6.5.1 Where GDIT has access and it is determined appropriate, GDIT will inspect for signs of trafficking in persons at the workplace, and if housing is provided, inspect the housing conditions.
 - 6.5.2 Subcontractors must agree to monitor trafficking-related activities, and to inspection and audit by GDIT. Any suspected activity will be investigated and reported pursuant to this plan and legal requirements.
 - 6.5.3 Where GDIT subcontractors are remotely located, and for lower tier subcontractors, GDIT will review the plans and certifications of its subcontractors to ensure they include adequate monitoring procedures. These plans must be made available upon request.
- 6.6 GDIT subcontractors have an obligation to protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the

employee was recruited, and shall not prevent or hinder the ability of these employees from cooperating fully with Government authorities.

- 6.7 If a GDIT subcontractor is made aware of any credible information from any source pertaining to a suspected trafficking violation, that subcontractor must investigate such allegations, take appropriate remedial measures, and immediately notify GDIT, the contracting officer and the agency Inspector General (IG) of that information, as well as what action it has taken with respect to the allegation.
- 6.8 GDIT subcontractors must fully cooperate with any Federal agency conducting an audit or investigation of potential anti-trafficking violations, including providing timely responses to Government investigators and providing reasonable access to facilities and staff.

7. Posting Of Compliance Plan

- 7.1 This Compliance Plan shall be posted at the workplace, unless the work under the contract is performed in the field or not otherwise at a fixed location, or is otherwise impractical to physically post, in which case a written copy of such Plan shall be provided to each affected employee and agent.
- 7.2 GDIT shall also post this Compliance Plan on its internal website, Connect, as well as its external website, www.gdit.com.
- 7.3 GDIT will post relevant contents of the Compliance Plan no later than the initiation of performance under the contracts subject to be anti-trafficking regulations.
- 7.4 GDIT and its subcontractors will meet any additional posting requirements pursuant to applicable FAR and DFARS anti-trafficking provisions, according to Section 5.1.2 of GDIT's Combating Trafficking In Persons Policy (LEG-POL-G-12).

8. Certification Of Compliance Plan

- 8.1 When required by FAR 52.222-50(h)(5) or FAR 52.222-56, GDIT will certify to the Government that (a) it will maintain this Anti-Trafficking Compliance Plan; (b) it will monitor, detect and terminate any subcontractor engaged in prohibited activities; and (c) after conducting sufficient due diligence, to the best of its knowledge and belief, neither GDIT nor any of its subcontractors or agents are engaged in prohibited activities, or if there are abuses relating to any of the prohibited activities outlined in GDIT Legal Policy LEG-POL-G-12 or this Plan, GDIT or its subcontractor has taken the appropriate remedial actions.

9. Training/Awareness

- 9.1 Periodic training will be provided to GDIT program managers, division management, Human Resources, Contracts and Legal Department personnel to ensure familiarity and awareness of the requirements of this Plan. Awareness articles will be disseminated by GDIT's Communications & Marketing Department through News Flashes, employee-wide communications and other internal awareness campaigns.