



Levin Sources Compliance Plan: Prohibiting Modern Slavery and Human trafficking

Purpose of the Compliance Plan

Levin Sources is committed to delivering impact ethically, honestly and with transparency. Levin Sources is committed to building an environment where our employees can feel respected and valued, and in turn can treat our customers, partners, donors and the communities and individuals we work with the same ethical standards. As part of our overall ethical goals, Levin Sources has adopted a zero-tolerance policy regarding modern slavery and human trafficking.

Our Policy prohibits individuals from:

- Engaging in modern slavery and human trafficking.
- Procuring commercial sex acts.
- Using forced labor in the performance of the award.
- Directly supporting or advancing modern slavery and human trafficking.

Levin Sources has developed this Model Compliance Plan (“Plan”) in accordance with the U.S. Government’s zero-tolerance policy regarding trafficking in persons by government contractors and award recipients, as set out in FAR 52.222-50, and in the USAID Standard Provision “Trafficking in Persons”.

The purpose of this Plan is to set out Levin Sources’ policies and procedures for:

1. Making Levin Sources employees aware of the conduct prohibited under the Anti-Trafficking Provisions and the actions that may be taken against employees for violations;
2. Employing fair recruitment, wage and housing practices; and
3. Preventing prohibited trafficking activity by subrecipients, subcontractors and suppliers/vendors, and monitoring, detecting and terminating those who engage in such activities.

Applicability

This Plan applies to all cooperative agreements, contracts, subcontracts, subawards and all non-U.S. government funded projects. The Plan may need to be adapted or modified for projects that are larger, more complex, or involve greater risk of trafficking activity.

The Plan applies to all Levin Sources employees, consultants, and volunteers. It also applies to all Levin Sources contractors, vendors, suppliers, subcontractors and subrecipients (“Suppliers”) who have contracts, subcontracts and sub agreements with Levin Sources (“Lower-Tier Awards”) valued at over \$500,000.

For all Lower-Tier Awards with an estimated value of \$500,000 or more, or that involve activities outside the U.S., Project staff must examine each one individually to assess the risk of trafficking activity, based



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on factors such as the number of non-U.S. citizens to be employed and whether the Lower-Tier Award will involve services or supplies susceptible to modern slavery and human trafficking . Project staff must adapt or modify the Plan as necessary to ensure that it is appropriate to the size and complexity of the Lower-Tier Award and the nature and scope of the activities to be performed.

Employee Awareness Program

Levin Sources has adopted a Policy Prohibiting Modern Slavery and Human Trafficking that describes the actions Levin Sources may take against employees and agents who violate the Policy and sets out the procedure for reporting and investigating Policy violations. The Policy is also summarised in Levin Sources' Standards of Conduct.

Levin Sources will make the Policy and this Plan available to all employees through our internal electronic file sharing system, outreach and training, and through the staff handbook provided to all Levin Sources staff.

All new personnel are required to read and acknowledge the Policy at the time of hire.

Levin Sources will periodically conduct specialised training on the Modern Slavery and Human Trafficking, the Policy and the Compliance Plan, on an as-needed basis.

Recruitment and Wage Plan

Levin Sources prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. Levin Source must fully and accurately disclose, in a format and language accessible to the employee, all key terms and conditions of employment, including wages and benefits, work location, living conditions, housing and associated costs (where provided or arranged by Levin Sources), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

Levin Sources prohibits the use of recruiters that do not have trained employees, or that do not comply with all labour laws of the country where the recruitment takes place.

Levin Sources prohibits charging recruitment fees to any employee.

Levin Sources will pay all employees wages that meet applicable host-country legal requirements or will explain any variance.

Where required by law or contract, Levin Sources will provide to every employee an employment contract, recruitment agreement or other required work document, written in a language the employee understands, containing all required information about the terms and conditions of employment, which may include, by way of example, the work description, wages, work location, living accommodations and associated costs, time off, transportation arrangements, grievance process, the content of applicable laws and regulations prohibiting modern slavery and human trafficking , and the prohibition on recruitment fees.



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Levin Sources prohibits destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents.

Housing Plan

In situations where Levin Sources provides housing to employees, the housing will meet host country housing and safety standards.

Supplier Compliance

All suppliers must agree to comply with the Policy and all applicable Modern Slavery and Human Trafficking Provisions.

All Levin Sources Suppliers with contract values exceeding USD\$500,000 must have a compliance plan to prevent prohibited trafficking-related activities and to monitor, detect and terminate any of its contractors, consultants, suppliers, subcontractors or subrecipients engaging in prohibited trafficking-related activities, and provide a copy of its compliance plan to Levin Sources.

The Supplier's compliance plan must meet the minimum requirements in the Modern Slavery and Human Trafficking Provisions and be appropriate to the size and complexity of the contract, subcontract or sub agreement with Levin Sources and the nature of the activities to be performed under it.

Prior to the award of any Supplier Contract, and on an annual basis thereafter, all Levin Sources Suppliers with contract values exceeding \$500,000 must submit a certification to Levin Sources:

- That the Supplier has implemented a compliance plan and has complied with its 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 activities, or if any abuses relating to prohibited activities have been found, Supplier has taken appropriate remedial and referral actions.

If any Supplier fails to comply with the Policy or applicable Modern Slavery and Human Trafficking Provisions, Levin Sources will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

- Requiring the Supplier to remove an employee or agent from a project;
- Requiring the Supplier to terminate its relationship with any contractor, consultant, supplier, subcontractor or subrecipient;
- Suspending payments to Supplier until violation is remedied; and/or
- Immediately terminating the Supplier Contract.

Reporting Requirements and Procedure

For all Levin Sources implemented programs, all Levin Sources personnel, Suppliers and Supplier Personnel are required to report suspected trafficking related activity or violations of the Policy Prohibiting Modern



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Slavery and Human Trafficking. Reports may be made via Levin Sources' anonymous compliance hotline: hello@levinsources.com

Reports may be made to any Levin Sources manager or via Levin Sources' anonymous compliance hotline: hello@levinsources.com . Any Levin Sources manager who receives such a report is required to immediately forward the report to Levin Sources' Human Resources Office.

Levin Sources' SMT will investigate all reports of prohibited trafficking related activity or violations of the Policy Prohibiting Modern Slavery and Human Trafficking and take appropriate action.

No Retaliation Policy

Levin Sources' Standards of Conduct strictly prohibit retaliation against any Levin Sources employee who reports any violations of the Policy Prohibiting Modern Slavery and Human Trafficking, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. Levin Sources' personnel who engage in any form of retaliation against those who report prohibited trafficking related activities or other violations of the Policy are subject to disciplinary action, up to and including termination of employment with Levin Sources.

Investigations

If Levin Sources receives credible information from any source that alleges that an employee, recipient, contractor, sub-awardee, vendor/supplier or agent has engaged in any of the Prohibited Activities, Levin Sources must immediately report it to the Modern Slavery Helpline on 08000 121 700 or the police on 101.

Levin Sources will cooperate fully with any agencies responsible for any investigations, audits or corrective actions relating to modern slavery and human trafficking , including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to Levin Sources facilities and staff.

Levin Sources will 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 will not prevent or hinder these employees from cooperating fully with U.S. government authorities.

References

- Levin Sources Policy Prohibiting Modern Slavery and Human Trafficking
- FAR 52.222-50 – Combating Trafficking in Persons
- USAID Standard Provision “Trafficking in Persons”
- Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime