
		Policy		Subject / Document Name	
		Document Number PL- TNG-SC-07		Human Trafficking and Slavery	
Revision IR	Date Originated 01/01/2016	Originator Supply Chain Management			Page 1 of 3
Date Revised 01/01/2016	Date Effective 01/01/2016	History Document Number		Element	Copy #
Approved by:	CEO, Meredith Siegfried Madden	VP, Supply Chain Mgmt. / Brian Schlegel		VP, HR & Organizational Dev. / Joel Dougherty	
	Meredith Siegfried Madden	Brian Schlegel		Joel Dougherty	

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1.0 PURPOSE

This policy emphasizes NORDAM’s commitment to comply with all applicable laws and regulations prohibiting human trafficking and slavery and NORDAM’s expectation that its Stakeholders, suppliers, subcontractors and agents shall also comply with all applicable laws prohibiting such exploitation.

2.0 SCOPE

This policy applies to all NORDAM Stakeholders, suppliers, subcontractors and agents.

3.0 RESPONSIBILITIES

It is the responsibility of Stakeholders, NORDAM management, and NORDAM’s suppliers, subcontractors and agents to adhere to this policy.

It is the responsibility of NORDAM management to ensure compliance with this policy.

4.0 DEFINITIONS

U.S. Government’s Policy Prohibiting Trafficking in Persons

The U.S. Government’s most current policy prohibiting trafficking in persons set forth in FAR 52.222-50 (Combating Trafficking in Persons) accessed at: <http://farsite.hill.af.mil/vffara.htm>

5.0 POLICY

5.1 NORDAM shall and NORDAM shall require its suppliers, subcontractors, and agents to comply with all applicable laws and regulations prohibiting human trafficking and slavery, including without limitation, the U.S. Government’s Policy Prohibiting Trafficking in Persons.


5.2 NORDAM will notify its Stakeholders, suppliers, subcontractors and agents of this policy and of the U.S. Government’s Policy Prohibiting Trafficking in Persons.

5.3 NORDAM will take appropriate action, up to and including termination, against Stakeholders, suppliers, subcontractors and agents who violate this policy, or when applicable, the U.S. Government’s Policy Prohibiting Trafficking in Person.

5.4 Stakeholders, suppliers, subcontractors and agents who believe there has been a violation of this policy should report it to one of the NORDAM Ethics Toll-Free Helplines:

- USA 1-866-549-4983
- Mexico 01-855-677-5809
- Singapore 800-110-2072
- United Kingdom 0808-234-6537
- <https://NORDAM.alertline.com>

5.5 NORDAM will not tolerate any retaliatory action against anyone who reports a genuine belief that this policy or the U.S. Government’s Policy Prohibiting Trafficking in Persons has been violated. NORDAM will investigate and follow-up on reported incidents. NORDAM shall report to the Contracting Officer and the agency Inspector General immediately any credible information it receives from any source of a violation of the U.S. Government’s Policy Prohibiting Trafficking in Persons. Each Stakeholder and employee of any NORDAM supplier, subcontractor or agent also has the right to make such a report with protection from reprisal under DFARS subpart 203.9 and also to report incidents to the Global Human Trafficking Hotline number at 1-844-888-FREE (3733) and/or help@befree.org.

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5.6 NORDAM will implement training on this policy to Stakeholders and NORDAM management who have direct responsibility for NORDAM's employment practices and NORDAM's supply chain management.

6.0 **REFERENCES**

None

7.0 **CHANGE HISTORY**

REV DATE	REV LEVEL	DESCRIPTION OF CHANGE	CHANGED BY:
01/01/2016	IR	Initial Release	Brian Schlegel