Tajhydro Anti-Trafficking Compliance Plan

Background and Purpose

Tajhydro has developed this Anti-Trafficking 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 Subpart 22.17 and 52.222-50(h).

The purpose of this Plan is to set out the policies and procedures for: (1) making employees aware of the prohibited conduct, 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 suppliers, subcontractors and subrecipients, and monitoring, detecting and terminating those who engage in such activities.

Applicability

This Plan sets out Tajhydro standards for anti-trafficking compliance and applies to all U.S. Government contracts and subcontracts. For all contracts and awards with an estimated value of $550,000 or more, or involve activities outside the U.S., Project staff must examine each award individually to assess the risk of trafficking activity, based on factors such as the number of non-U.S. citizens to be employed and whether the contract or award will involve services or supplies susceptible to trafficking in persons.

Employee Awareness Program

Tajhydro has adopted a policy on Combating Trafficking in Persons ("Policy") that reflects the Anti-Trafficking Provisions' provisions prohibiting trafficking-related activities, describes the actions Tajhydro 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 summarized in the Company Code of Ethics and Conduct (the "Code").

All personnel will be notified of the Policy or any changes thereto via a company-wide email containing a link to the Policy with instructions to access and review the Policy.

Recruitment and Wage Plan

Tajhydro prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. The Company 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 the Company), significant costs to be charged to the employee, and, if applicable,

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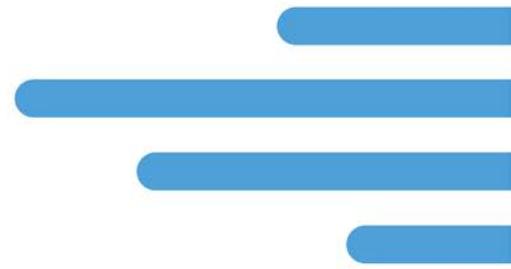
the hazardous nature of the work.

The Company prohibits charging recruitment fees to any employee.

The Company will pay wages to all employees that meet applicable host-country legal requirements, or will explain any variance.

Where required by law or contract, the Company 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 of conditions of employment.

Housing Plan
In situations where the Company provides housing to employees, the housing will meet host country housing and safety standards.

Supplier Compliance
All Tajhydro contractors, consultants, subcontractors and other agents ("Suppliers") must agree to comply with the Policy and all applicable Anti-Trafficking Provisions, as applicable. The Company will include language to that effect in all applicable Supplier contracts/agreements ("Supplier Contracts"), including inserting FAR 52.222-50, FAR 52.222-56 and USAID clauses, when applicable.

When applicable, the Supplier's compliance plan must meet the minimum requirements in the Anti-Trafficking Provisions and be appropriate to the size and complexity of the contract, subcontract or other agreement with the Company and the nature of the activities to be performed under it. Failure to comply may result in suspension or termination of the relevant contract/agreement.

Reporting Requirements and Procedure
All Tajhydro personnel, Suppliers and Supplier Personnel are required to report any suspected trafficking-related activity or violation of this policy. Reports may be made to the Tajhydro Human Resources office.

In addition, reports may be made to the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

The Company will investigate all reports of prohibited trafficking-related activity or violations of this policy and take appropriate action, including reporting to the Company's Prime Contractor for further action (if

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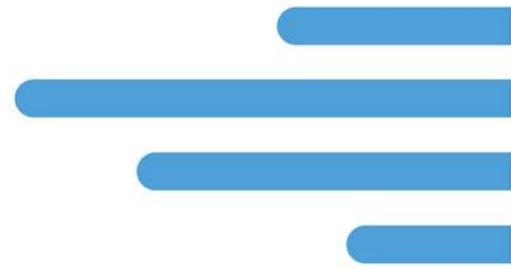
applicable).

Tajhydro strictly prohibits retaliation against any Company employee or agent who reports prohibited trafficking-related activity or other violations of policy, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. Company personnel who engage in any form of retaliation against those who report prohibited trafficking-related activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment or other contract/agreement.

Investigations

The Company will cooperate fully with any US Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to Company facilities and staff.

The Company 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 US government authorities.

Posting

Tajhydro will make the Policy and this Plan readily available to its employees and suppliers, when applicable. In addition, where possible it will be posted on its external website https://tajhydro.tj/ . The Company will also post the reporting/hotline information at its workplace, except where the work is being performed in the field or not otherwise at a fixed location.

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