



**STATEMENT OF COMPANY POLICY
Trafficking in Persons Compliance Plan**

Policy #	POL-10-Plan	Effective Date	September 1, 2015
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Contract No. W81XWH-15-C-0101

Issued by: USA MED RESEARCH ACQ ACTIVITY

Period of Performance: September 1, 2015 – August 30, 2017

I. PURPOSE

Pursuant to Cleveland BioLabs, Inc. (CBLI or Company) status as a contractor for the United States Department of Defense, CBLI personnel are required to comply with the provisions contained in Federal Acquisition Regulation 52.222-50 (the “FAR”).

II. POLICY STATEMENT

Policy No. POL-10, Defense Policy, is hereby incorporated by reference.

III. COMPLIANCE PLAN

The following sets forth CBLI’s compliance plan for the above referenced contract, as required by FAR 52.222-50(h), based upon the size and complexity of the contract and the nature and scope of the activities. Additional awareness information about trafficking in persons may be found at the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons website at <http://www.state.gov/j/tip>.

Awareness Program

Pursuant to the FAR, contractors, contractor employees and their agents are prohibited from:

- Engaging in severe forms (i.e. using force, fraud or coercion) of trafficking in persons during the period of performance of a contract;
- Procuring commercial sex acts during the period of performance of a contract;
- Using forced labor in the performance of a contract;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
- Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruitment takes place;



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- Charging employees recruitment fees;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who was not a national of the country in which the work is taking place and who was brought to that country for the purposes of working on a U.S. Government contract, subcontract or portion(s) of contracts or subcontracts performed outside the United States; or
- Failing to provide return transportation or pay for the costs of return transportation upon the end of employment, for an employee who is not a United States national and who was brought into the United States for the purpose of working on a U.S. Government contract or subcontract if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee for portions of contracts and subcontracts performed inside the United States;
- Providing or arranging housing that fails to meet the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating.

Any violation of the FAR or this policy could result in disciplinary action which may include but are not limited to, an employee's removal from the contract or termination of employment. For subcontractors and subcontractor employees, failure to comply with the requirements of the FAR is grounds for CBLI to take any and all appropriate actions, up to and including immediate termination of that subcontractor's contract with CBLI.

Employees

On an annual basis, CBLI requires all employees to certify that they have read and understand the CBLI Code of Conduct and agree to comply with the policies, procedures and principles of the CBLI Defense Policy. The policies are publicly posted on CBLI's website at:

http://irdirect.net/CBLI/corporate_governance

CBLI conducts in-person, all-hands compliance training approximately annually and as needed throughout the year.

Subcontractors/Suppliers

The FAR clause is "flowed down" to our subcontractors, as applicable. Subcontractors are also asked to certify that they have read and understood CBLI's Defense Policy and asked to certify that they have read and understood that document. Copies of the subcontractor certifications are maintained on file with CBLI.

Consultants



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Consultants are provided copies of CBLI's Defense Policy and asked to certify that they have read and understood the policy.

Questions

Questions regarding CBLI's policy and actions to combat trafficking in persons may be directed to Compliance@cbiolabs.com.

Reporting Process

Employees should consult the Company Compliance Officer if they are uncertain whether a specific action would be in violation of the FAR or the Defense Policy.

Employees may report, in good faith, and have a responsibility to, without fear of retaliation and subject to protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, for reprisal for whistleblowing on trafficking in persons violations, any activity that violates the FAR or CBLI's Defense Policy to the Company's management, the Company Compliance Officer or report via the Company's whistleblower email audithotline@cbiolabs.com or as otherwise specified in the Company's Whistleblower Policy. In addition, employees may contact the Global Human Trafficking Hotline at 1-844-888-FREE or via its email address at help@befree.org or the Department of Defense at www.dodig.mil/hotline/ or toll free at 800-424-9098. Anyone else, including subcontractors, agents, and consultants may use the hotlines or websites.

Notification

CBLI shall promptly inform the Contracting Officer upon receipt of credible information alleging a violation of FAR 52.222-50; and any actions taken against a CBLI employee, subcontractor, subcontractor employee, or their agent pursuant to FAR 52.222-50.

Posting

CBLI shall post its compliance program no later than the initiation of contract performance, at the workplace and on its website.

Certifications

CBLI will provide certifications to the contracting officer annually as required by the FAR.

Prior to the award of a subcontract, and annually during performance of the contract, CBLI shall obtain from each subcontractor with subcontracts for supplies, other than COTS items, to be acquired outside the United States, or services to be performed outside the United States, as certification is required by the FAR.