



OP 03.05: COMBATING HUMAN TRAFFICKING

PURPOSE:

As part of Mississippi State University's (MSU) core values and commitment to equity and inclusion, human trafficking and forced labor in any form is not tolerated. Human trafficking (or "trafficking in persons" as used in the U.S. government policy) includes the recruitment, harboring, transportation, provision, or obtaining of persons through the use of force, fraud, or coercion, for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. It also includes sex trafficking, and inducing a commercial sex act by force, fraud, or coercion, or in which the person induced to perform a commercial sex act is under 18 years old.

Federal law, state law, and Mississippi State University policy prohibits human trafficking. Furthermore, it is required by federal law that an anti-trafficking compliance program be in place for any federal contractor(s) and sub-contractor(s) where the estimated value of the supplies acquired or services required to be performed outside the United States exceeds \$500,000.

POLICY:

The U.S. Government has a zero-tolerance policy regarding Government employees, contractor personnel or their agents engaging in any form of trafficking in persons. MSU complies with all applicable regulations regarding Combating Trafficking in Persons. Definitions of other relevant terms are set forth in the U.S. government's regulations implementing its policy, available at 2 C.F.R. § 175.15 [for grants and cooperative agreements] and 48 C.F.R. § 52.222-50 [for federally-funded contracts].

PROCEDURE:

Employees at Mississippi State University must cooperate fully in providing reasonable access to allow contracting agencies and other responsible enforcement agencies to conduct audits, investigations, or other actions to ascertain compliance with the Trafficking Victims Protection Act (TVPA), Executive Order 13627, or any other applicable law or regulations establishing restrictions on trafficking in persons, the procurement of commercial sex acts, or the use of forced labor.

For federal contracts and sub-contracts where the estimated value of the supplies acquired or services required to be performed outside the United States exceeds \$500,000, the Office of Compliance and Risk Management shall be contacted to assist in creating a tailored compliance plan specific to the project.

Always contact 911 or MSU Police if you or someone you know is in immediate danger. MSU employees shall notify the Office of the Vice President and General Counsel if they become aware of any activities that they suspect are related to or meet the definitions of trafficking in

persons. MSU employees are expected to report any credible information regarding human trafficking incidents by clicking [MSU Ethics Line](#) or via toll-free 877-310-0424. MSU employees can also call the Global Human Trafficking Resource Center Hotline at 1-888-373-7888, or text BEFREE (233733).

MSU prohibits taking any retaliatory action against individuals who make a good faith disclosure of suspected wrongful conduct. Individuals are protected from acts of retaliation for reporting concerns or suspected wrongful conduct in good faith, consistent with applicable federal and state laws as well as university policy.

MSU's Office of Compliance and Integrity is available to provide further assistance regarding these requirements. Please contact 662-325-2786 with questions.

Sanctions

Any violations of university policies by an individual will be dealt with in accordance with applicable university policies and procedures, which may include disciplinary actions up to and including termination from the university. Suspected violations of law will be referred to law enforcement or the appropriate federal agency and may result in criminal penalties.

Applicable Laws

Further information regarding state laws and policies, including how to recognize the potential signs of human trafficking, can be found at the following:

- National Human Trafficking Resource Center (Mississippi)
 - <https://humantraffickinghotline.org/state/mississippi>
- FAR 52.222-50 Combating Trafficking in Persons
 - <https://www.acquisition.gov/far/52.222-50>
- 2 CFR Part 175:15 Award Terms for Trafficking in Persons
 - <https://www.ecfr.gov/cgi-bin/text-idx?node=pt2.1.175&rgn=div5>
- Human Trafficking Act: Mississippi Code §97-3-54.1 through 97-3-54.7
 - <https://advance.lexis.com/container?config=00JAAzNzhjOTYxNC0wZjRkLTQzNzAtYjJIYS1jNjExZWYxZGFhMGYKAfBvZENhdGFsb2cMIW40w5iIH7toHnTBIEP0&crid=932fac7b-72d1-4c45-a6fa-334eb3a9273e&prid=da9303e1-8a79-438b-aca6-e6b0bf57b68a>
- Executive Order 13627: Strengthening Protections against Trafficking In-Persons In Federal Contracts
 - <https://www.govinfo.gov/content/pkg/DCPD-201200750/pdf/DCPD-201200750.pdf>
- Department of Homeland Security (DHS) Human Trafficking Training Program
 - <https://www.dhs.gov/blue-campaign/awareness-training>

REVIEW:

This operating policy will be reviewed every four years or as needed by the Risk and

Compliance Officer, the Vice President for Research and Economic Development, and the Vice President for the Division of Agriculture, Forestry and Veterinary Medicine.

REVIEWED BY:

<u>/s/ Joy Graves</u>	<u>4/26/21</u>
Risk and Compliance Officer	Date

<u>/s/ Julie Jordan</u>	<u>4/26/21</u>
Vice President for Research & Economic Development	Date

<u>/s/ Keith Coble</u>	<u>4/26/21</u>
Vice President for Agriculture, Forestry & Veterinary Medicine	Date

<u>/s/ Tracey Baham</u>	<u>4/26/21</u>
Director, Institutional Research & Effectiveness	Date

<u>/s/ Joan Lucas</u>	<u>4/26/21</u>
General Counsel	Date

APPROVED:

<u>/s/ Mark E. Keenum</u>	<u>4/26/21</u>
President	Date