

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 1 of 35
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## Purpose

Parsons Government Services, Inc., and its subsidiaries (collectively “PGSI”) have a zero-tolerance policy regarding trafficking in persons. Pursuant to Federal Acquisition Regulation (“FAR”) 52.222-50, “Combatting Trafficking in Persons,” PGSI, its subcontractors, labor brokers, and their employees may not: engage in “severe forms of trafficking in persons,” which generally is defined to include any conduct or condition that involves sex trafficking or involuntary servitude; procure “commercial sex acts,” which are defined as “any sexual activity on account of which anything of value is given to or received by any person”; or use “forced labor” in the performance of a government contract. Forced labor generally includes any circumstances where labor or services are obtained from a person using acts or threats of serious harm, physical restraint, or abuse of law or the legal process.

In addition to the FAR, this Combatting Trafficking in Persons (“CTIP”) Plan and Guidebook outlines policies and procedures that must be complied with by all PGSI employees, contractors, subcontractors, labor brokers, and their employees during performance of work for the Federal Government. PGSI shall hold all individuals and entities accountable for CTIP Plan violations. Consequences may include, but are not limited to, termination of the subcontractor’s agreement or the employee’s relationship with PGSI, in addition to possible criminal charges and penalties.

## Scope

This standard applies to PGSI, its subsidiaries, and all PGSI and subsidiary officers, directors, employees, subcontractors, agents, and labor brokers, worldwide.

## References

Parsons Agent Approval Policy and Procedure

Parsons Corporate Human Trafficking Policy

Parsons Federal Combatting Trafficking in Persons Legal Procedure

Parsons Federal Combatting Trafficking in Persons Procurement Procedure

## Standards

### Recruitment

**Direct Hires:** Wherever possible, for work in the United States, PGSI shall directly recruit and hire its own employees. During the direct hire process in the U.S., PGSI Human Resources (HR) and Recruiters shall:

- (1) Comply with applicable local labor laws of the country in which recruiting and/or or performance takes place.
- (2) Train hiring managers and other responsible employees on this CTIP Plan and their obligations and responsibilities in complying with the Plan. This will include providing training on adherence to local laws, truthfulness in recruiting, trafficking in persons, code of conduct, and other related subjects.
- (3) Not charge recruitment and/or or other prohibited fees to the employee.

<p style="text-align: center;"><b>PARSONS</b> Federal Standard Legal</p>	<p style="text-align: center;">Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p style="text-align: center;">Page 2 of 35</p>
--	---	---

(4) Not use any misleading or fraudulent recruitment practices (including those prohibited in Fraud in Foreign Labor Recruiting, 18 U.S.C §1351) to solicit, recruit, offer employment to, or retain employees. Prohibited activities include, but are not limited to, misrepresentations concerning the location of the work site and work compensation.

(5) Provide a written employment contract, recruitment agreement, or similar work paper that is compliant with local laws and in a format and language that the employee understands.

**Recruiting Through Labor Brokers:** In the event that it is necessary to use labor brokers, domestically or abroad, PGSI HR and Recruiters shall:

(1) Prohibit the use of recruiters or labor brokers that are not trained in CTIP activities or that do not comply with PGSO source and host country rules and regulations.

(2) Evaluate the potential labor brokers for human trafficking risks prior to engaging the labor brokers by:

(a) Confirming the labor brokers' agreement to comply with its CTIP Policy.

(b) Reviewing the labor brokers' existing CTIP compliance program, if any.

(c) Screening the labor brokers, in coordination with Parsons Ethics and Compliance team, for red flags (e.g., hits on restricted party lists) and resolving any red flags; and

(3) Contractually require labor brokers to:

(a) Comply with applicable U.S. laws, international regulations, and local laws.

(b) Comply with CTIP Policy and all applicable CTIP regulations (specifically, FAR 52.222-50 and other applicable clauses, e.g., JCC-1/A 952.222-0001 – Prohibition Against Human Trafficking, Inhumane Living Conditions, and Withholding of Employee Passports).

(c) Create, implement, and comply with a customized compliance plan consistent PARSONS CTIP Policy and any targeted compliance requirements that PARSONS has identified for the labor brokers.

(d) Certify that neither it nor its agents have engaged in nor will they engage in any prohibited activities in violation of PGSI's CTIP procedure or applicable CTIP laws.

(e) Comply with Parsons's Standards of Ethical Conduct for Business Partners, or in the alternative, a substantially similar Code of Conduct.

(f) Not charge recruitment and/or other prohibited fees to the employee.

(g) Not use misleading or fraudulent recruitment practices (including those prohibited in Fraud in Foreign Labor Recruiting, 18 U.S.C §1351) to solicit, recruit or retain employees. Prohibited activities include but are not limited to misrepresentations concerning the location of the work site and work compensation.

(h) Provide a written employment contract, recruitment agreement, or similar work paper that is compliant with local laws and in a format and language that the employee understands.

(i) Ensure that the employment agreements do not contain any restrictions or terms that are prohibited by local laws.

(j) Cooperate with planned and unannounced audits and investigations by Parsons and the U.S. government.

*The most current and effective version of this document is available and maintained on Parsons Corporate Policy Center. The Company may revise, rescind or add to any policies, benefits or business practices from time to time in its sole and absolute discretion with or without prior notice.*

<p style="text-align: center;"><b>PARSONS</b> Federal Standard Legal</p>	<p style="text-align: center;">Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p style="text-align: center;">Page 3 of 35</p>
--	---	---

(k) Provide access to and allow Parsons to monitor and audit compliance with this guidebook and provide plans, policies, procedures, and reports to ensure and certify compliance.

(l) Not assign performance to agents without prior written approval from Parsons via the Agent Approval Policy and Procedure.

**Subcontractor Recruiting:** In the event that it is necessary to use subcontractors, PGSI, through its due diligence and monitoring by its Subcontract Administrators shall:

(1) Contractually require subcontractors to: Comply with applicable U.S. laws, international regulations, and local laws. Comply with all applicable CTIP regulations (specifically, FAR 52.222-50 and other applicable clauses, e.g., JCC-I/A 952.222-0001 – Prohibition Against Human Trafficking, Inhumane Living Conditions, and Withholding of Employee Passports).

(2) Certify that neither it nor its agents have engaged, nor will they engage in any prohibited activities in violation of the CTIP plan or applicable CTIP laws.

(3) Not charge recruitment and/or other prohibited fees to its employees.

(4) Not use misleading or fraudulent recruitment practices (including those prohibited in Fraud in Foreign Labor Recruiting, 18 U.S.C §1351) to solicit, recruit or retain employees. Prohibited activities include, but are not limited to misrepresentations concerning the location of the work site and work compensation.

(5) Provide a written employment contract, recruitment agreement, or similar work paper that complies with local law and in a format and language that the employee understands.

(6) Contractually flow down the above-mentioned compliance requirements to any labor brokers it intends to recruit through.

For any non-commercial item procurement with a value exceeding \$5M the subcontractor shall also:

(1) Prominently display the DoD Combating Trafficking in Persons and Whistleblower Protection hotline posters in employee workspaces in English and in any foreign language(s) spoken by a significant part of the workforce (DFARS 252.203-7004).

(2) Provide and post an employee bill of rights in employee workspaces in English and any foreign languages spoken by a significant portion of the workforce (DFARS 252.225-7040). Specifically, subcontractors shall ensure that their employees are aware of their rights to:

- (a) Hold their own identity or immigration documents, such as a passport or driver's license;
- (b) Receive agreed-upon wages on time;
- (c) Take lunch and work breaks;
- (d) Elect to terminate employment at any time;
- (e) Identify grievances without fear of reprisal;
- (f) Have a copy of their employment contract in a language they understand;
- (g) Receive wages that are not below the legal in-country minimum wage; and
- (h) Be notified of their rights, wages, and prohibited activity.

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<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 4 of 35
---	---	-----------------

(3) Notify employees and subcontractors regarding their obligation to report human trafficking violations and that they will be afforded whistleblower protection (see 48 C.F.R. 252.222-7007).

(4) Require mitigation by Subcontractor of any violations of the FAR or other CTIP regulations and may suspend any subcontract payments until the subcontractor has taken the necessary remedial actions.

**Subcontractors' Use of Labor Brokers:** There may be circumstances where PGSI subcontractors need to recruit their employees through labor brokers that the subcontractors directly engage with. In these circumstances, PGSI Subcontract Administrators shall contractually require that:

(1) Subcontractors are prohibited from using recruiters or labor brokers that are not trained in CTIP activities or that do not comply with PGSI host country rules and regulations.

(2) Subcontractors must evaluate the potential labor brokers for human trafficking risks prior to engaging the labor brokers by:

(a) Confirming the labor brokers' agreement to comply with PGSI's CTIP Policy.

(b) Reviewing the labor brokers' existing CTIP compliance program, if any.

(c) Subcontractors require the labor brokers to complete the DDA. The DDA shall include screening questions that allows PGSI to identify CTIP risks in the labor brokers' practices, including:

(i) its means of recruiting;

(ii) the information it presents to potential employees on job requirements, work conditions and compensation;

(iii) any fees, deposits, and bonds charged to the employees;

(iv) procedures surrounding retention of employees' identity documents; and

(v) if applicable, information on the transportation and housing arrangements that will be provided to the employees during the recruitment or onboarding process.

(d) Subcontractors must screen the labor brokers for red flags (e.g., hits on restricted party lists) and resolving any red flags.

(e) Subcontractors must evaluate the DDA responses and supporting documentation. Based on the answers and evidence furnished by the labor brokers, PARSONS shall subsequently identify the level of CTIP risks associated with each labor broker. For example, if a labor broker is recruiting from a country that is classified as high-risk from a CTIP perspective, if a labor broker requests to use agents, or if the labor broker's recruitment practices are not aligned with this Plan's requirements, PARSONS shall identify the labor broker as high risk and mandate the appropriate corrective actions for the labor brokers to remediate those risks.

(3) Subcontractors must only engage with labor brokers who pose no or low CTIP risks.

(4) Upon approving the selected labor brokers, if the subcontractor intends to continue recruiting through the approved labor brokers, upon encountering any red flags, the subcontractor shall immediately notify PGSI so that corrective actions can be taken.

<p style="text-align: center;"><b>PARSONS</b> Federal Standard Legal</p>	<p style="text-align: center;">Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p style="text-align: center;">Page 5 of 35</p>
--	---	---

(6) Subcontractors must cooperate with planned and unannounced audits and investigations by Parsons and the U.S. government.

(7) Subcontractor must provide access to and allow PGSI to monitor and audit compliance with this guidebook and provide plans, policies, procedures, and reports to ensure and certify compliance.

(8) Subcontractor shall not assign performance to agents without prior written approval from Parsons.

### **Task Order Operations**

**Training and Awareness:** PGSI HR shall provide comprehensive onboarding and compliance training for all employees. Training topics may include, but are not limited to: Parsons Code of Conduct; this CTIP Guidebook and related policies, and reporting channels; the U.S. Government's policy prohibiting trafficking-related activities; relevant US laws and regulations; sexual assault prevention and response; cultural sensitivity; applicable local law and regulation; foreign country threat briefings; TO/Command Region-specific topics; the use of personal protective equipment; information security; and isolation training.

**Documentation:** PGSI HR shall not destroy, conceal, confiscate, or deny any other Parsons' or PGSI's employees' access to their identity documents. PGSI HR shall only hold an original identity document (e.g., passport, national identification documents) at the employees' request and shall immediately return documents to the employee upon request and at no charge to the employee.

**Reports and Investigations:** PGSI will provide its employees information on all the methods and channels of reporting violations and concerns. Parsons will promptly investigate all reported concerns. Parsons has a strict no retaliation policy that protects complainants and those who participate in investigations from retaliation for having raised good faith complaints. Parsons will prominently display the DoD Combating Trafficking in Persons and Whistleblower Protection hotline posters in employee workspaces in English and in any foreign language(s) spoken by a significant part of the workforce (DFARS 252.203-7004). Parsons will provide and post an employee bill of rights in employee workspaces in English and any foreign languages spoken by a significant portion of the workforce (DFARS 252.225-7040). Parsons also provides the EthicsPoint HelpLine for reporting purposes. All reports should be reported as required under the FAR, and also be reported to Parsons Ethics and Compliance for investigation.

**Demobilization:** PGSI shall inform its employees that they can demobilize at any time and that PGSI and its subcontractors will not destroy, confiscate, or deny employees access to their immigration documents. PGSI and its subcontractors shall provide or pay the cost of return transportation at the end of employment for any employee who is not a national of the country where the work took place and who was brought into that country for the purposes of working on a for Parsons as a Prime Contractor, or as an employee of Parsons working on a Subcontract. In cases where PGSI does not provide travel for the subcontractor and to ensure that employees are not charged for return travel to their country of origin, subcontractors shall submit travel reports which shall be cross-referenced to the demobilizing staff's financial invoices of demobilizing staff.

<p style="text-align: center;"><b>PARSONS</b> Federal Standard Legal</p>	<p style="text-align: center;">Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p style="text-align: center;">Page 6 of 35</p>
--	---	---

## Definitions

**Child labor** is work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development, often interfering with or depriving them of the opportunity to attend school.

**Commercial Sex Act and Commercial Exploitation** occurs when a child is used sexually by an adult and the adult pays to do this with money, gifts or favors. A gift could be food or clothes. A favor could be a promise of good grades, shelter, or protection.

**Forced labor or Involuntary Servitude** refers to situations in which persons are coerced to work using violence or intimidation, physical restraint, or by more subtle means such as accumulated debt, retention of identity papers, threats of denunciation to immigration authorities, or abuse of law or the legal process.

**Human trafficking** is the illegal movement of people.

**Severe Forms of Human Trafficking** include any conduct or condition that involves sex trafficking/exploitation or involuntary servitude/forced labor.

## Responsibilities

**FED Legal** provides guidance and oversight into the implementation of this standard. Updates procedures and standards as necessary and appropriate. Provides corporate leadership visibility to CTIP efforts in conjunction with Ethics and Compliance and Human Resources.

**FED Contracts and Subcontracts Administrators** provide annual certification to USG contracting officers that PGSI is in compliance with FAR 52.222-50 and require subcontractors, vendors, and brokers to do the same. Ensure the flow-down of mandatory CTIP contractual language in subcontractor and labor broker contracts. Immediately inform USG contracting officers, FED Legal, and Ethics and Compliance of any credible information from any source alleging that any PGSI employee has violated this standard, and of any corrective actions deriving from the same.

**Ethics and Compliance** provides corporate leadership visibility to CTIP efforts in conjunction with FED Legal and Human Resources. Intakes and investigates internally, as appropriate, any reported violations of these procedures and standards.

**Human Resources** develops, deploys, and tracks training on this procedure and guidebook for PGSI employees. Provides this guidebook in a format and language understandable by the audience. Obtains acknowledgements of the training, and confirmation of individuals awareness of their rights and obligations. Administers, in conjunction with management, corrective actions for violations of this procedure and guidebook. Refreshes training materials as necessary and appropriate. Provides guidance, oversight, and corporate leadership visibility to CTIP efforts in conjunction with Ethics and Compliance and FED Legal.

**FED Program Managers** are responsible encouraging CTIP compliance; acknowledging understanding of rights and obligations, the CTIP procedure and guidebook, and consequences for violations. Reporting any suspected or known human trafficking incidents to Ethics and Compliance, FED Legal, and FED Contracts.

**Internal Audit** implements CTIP procedure audits as necessary.

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 8 of 35
---	---	-----------------

**Exhibits and Sample Documents**

**Subcontractor-Labor Agent Due Diligence Assessment**

This due diligence assessment (DDA) is designed to identify potential gaps and vulnerabilities in business processes of subcontractors and their labor agents that could indicate a risk of forced labor or human trafficking. These labor abuses are emerging challenges to social responsibility and are of high importance to contractors and their government customers. This survey is intended to gather information on risks of forced labor and human trafficking that you as a company may be facing, and ultimately to help you, your labor agents, and our mutual customers to detect, remediate and mitigate risks of labor abuse. Thank you for your time and effort in completing this DDA in full.

**A. QUALIFYING INFORMATION AND INSTRUCTIONS FOR COMPLETING THE DDA**

Do you or third-party labor agents acting on your behalf recruit foreign workers to work at your sites?

- Yes
- No

If yes, please indicate in the table below who is responsible for the recruitment/hiring/selection and management/employment of foreign workers (check all that apply).

<b>Functions/roles</b>	<b>Your Company</b>	<b>Receiving Country Labor Agent(s)</b>	<b>Sending Country Labor Agent(s)</b>
Recruitment, selection, and/or hiring of foreign workers	<input type="checkbox"/> <i>Please fill out forms B and C</i>	<input type="checkbox"/> <i>Please fill out forms B and D</i>	<input type="checkbox"/> <i>Please fill out forms B and E</i>
Onsite management or employer of record of foreign workers	<input type="checkbox"/> <i>Please fill out forms B and C</i>	<input type="checkbox"/> <i>Please fill out forms B and D</i>	N/A

DDA Instructions: Please fill out the forms indicated in the table above.

<p style="text-align: center;"><b>PARSONS</b> Federal Standard Legal</p>	<p style="text-align: center;">Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p style="text-align: center;">Page 9 of 35</p>
--	---	---

*Examples:*

- ❖ *If you work directly with a labor agent in a sending country to recruit workers to your site and your company performs all onsite management functions and is the employer of record for all workers, fill out forms B, C, and E*
- ❖ *If your company directly recruits workers, performs all onsite management functions and is the employer of record for all workers, fill out forms B and C*
- ❖ *If a labor agent in a sending country works with a labor agent in the receiving country to recruit workers to your site and your company performs all onsite management functions and is the employer of record for all workers, fill out forms B, C, D, and E*
- ❖ *If a labor agent in a sending country works with a labor agent in the receiving country to recruit workers to your site, and a labor agent in the receiving country performs some onsite management functions, but your company is the employer of record for all workers, fill out forms B, C, D, and E*

Please complete one form for each third-party intermediary that provides services related to the recruitment, selection, hiring, transport, training, management, or employment of foreign workers who labor at your site or provide labor or services related to the operation of your site.

For the purposes of this form, such third-party intermediaries shall be referred to as labor agents, and the term labor agent shall be understood to encompass all other terms used in the industry to refer to third-party intermediaries performing such functions, including but not limited to labor broker, recruitment agent, outsourcing agent, manpower agent, labor contractor, employment agent, and sub-agent.



<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 10 of 35
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## B. SUBCONTRACTOR SITE PROFILE INFORMATION

### COMPANY PROFILE

Name of your company: \_\_\_\_\_

Name of person completing the form: \_\_\_\_\_

Title/position: \_\_\_\_\_

Email: \_\_\_\_\_

Date on which this form was completed: \_\_\_\_\_

#### **Company Address**

Street address 1: \_\_\_\_\_

Street address 2: \_\_\_\_\_

City: \_\_\_\_\_

Province: \_\_\_\_\_

Postal Code: \_\_\_\_\_

Country: \_\_\_\_\_

Telephone: \_\_\_\_\_

### SYSTEM FOR LABOR SUPPLY

If your company plans to use labor agents to recruit, hire, manage or employ foreign workers at your site, please record below basic information on these agents. If you don't use labor agents, you may leave this section blank.

Name of Receiving Agent	Nationality of Workers Supplied	Services performed by Receiving Agent	Partner Labor Agent in Sending Country	Sending Agent Country of Operations
		<input type="checkbox"/> Recruitment <input type="checkbox"/> Employer of record <input type="checkbox"/> Some aspect of onsite		

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 11 of 35
---	---	------------------

		management (payroll, housing, etc.)		
		<input type="checkbox"/> Recruitment <input type="checkbox"/> Employer of record <input type="checkbox"/> Some aspect of onsite management (payroll, housing, etc.)		
		<input type="checkbox"/> Recruitment <input type="checkbox"/> Employer of record <input type="checkbox"/> Some aspect of onsite management (payroll, housing, etc.)		
		<input type="checkbox"/> Recruitment <input type="checkbox"/> Employer of record <input type="checkbox"/> Some aspect of onsite management (payroll, housing, etc.)		
		<input type="checkbox"/> Recruitment <input type="checkbox"/> Employer of record <input type="checkbox"/> Some aspect of onsite management (payroll, housing, etc.)		

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 12 of 35
---	---	------------------

## C. FOREIGN EMPLOYEE QUESTIONNAIRE

Note the questions in this questionnaire refer to your intended treatment of foreign workers you plan to use on the program. This refers only to foreign employees that will be recruited, hired, managed or employed directly by your company, without the assistance of any labor agent.

### RECRUITMENT OF FOREIGN WORKERS

For foreign workers who will be recruited, hired, managed or employed directly:

Who pays for the cost associated with each of the following processes? Please indicate amounts paid by the subcontractor or the worker for each item. Please also indicate to whom the payment is rendered.

		Subcontractor	Worker	Comment
Demand set attestation	Amount paid: (Please specify currency)			
	To whom paid:			
Visa	Amount paid: (Please specify currency)			
	To whom paid:			
Post-arrival medical exam	Amount paid: (Please specify currency)			
	To whom paid:			
Receiving country government mandated fees, levies, and insurance	Amount paid: (Please specify currency)			
	To whom paid:			

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 13 of 35
---	---	------------------

		Subcontractor	Worker	Comment
Trade or skills testing and associated worker travel	Amount paid: (Please specify currency)			
	To whom paid:			
Airfare to country of employment	Amount paid: (Please specify currency)			
	To whom paid:			
Work permit and other immigration documentation	Amount paid: (Please specify currency)			
	To whom paid:			
Residency/police clearance	Amount paid: (Please specify currency)			
	To whom paid:			
Housing	Amount paid: (Please specify currency)			
	To whom paid:			
Medical attention and welfare care	Amount paid: (Please specify currency)			
	To whom paid:			
Return and repatriation	Amount paid: (Please specify currency)			
	To whom paid:			

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 14 of 35
---	---	------------------

## FEES, DEPOSITS & BONDS PAID BY FOREIGN WORKERS

Will foreign workers be required to deposit money or other collateral or post any kind of bond with your company or prior to becoming employed?

- Yes
- No
- I don't know

Will foreign workers borrow money directly from the site in order to pay recruitment-related expenses?

- Yes
- No
- I don't know

## WORKER CONTRACT & TERMINATION POLICIES

Who will foreign workers sign an employment contract with? (check all that apply)

- My company
- Another employer (franchisee, holding company, group, etc.)
- We do not use employment contracts
- I don't know

Please append a sample of the employment contract.

When will foreign workers get a copy of their employment contract?

- At least five days before departure from their home country
- Less than five days before departure from their home country
- Upon arrival in the receiving country (location of work)
- Workers are not given copies of their contracts
- I don't know
- 

Additional Information/Other: \_\_\_\_\_

## IDENTITY DOCUMENTS

Who will hold foreign worker identity documents (passports or national identity cards etc.)? (Choose all that apply)

- My company
- The worker
- Other \_\_\_\_\_

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 15 of 35
---	---	------------------

How will foreign worker identity documents be handled? (Choose all that apply)

- My company keeps only photocopies of identity documents and the worker keeps the originals in his or her possession
- It is mandatory that workers turn in their identity documents to the company for safekeeping
- Workers can choose to have the company hold their documents for safekeeping or to keep their documents in their own possession
- I don't know

If the company will hold identity documents, how will workers retrieve them? (Choose all that apply)

- Workers can retrieve them right away for any reason
- Workers can retrieve them if they provide a pre-approved justification
- Workers can retrieve them for any reason, but only during specified hours and/or with a notice period
- Workers can only retrieve their documents when they return to their home country for a visit
- Workers have to pay a deposit in order to retrieve their passport
- Workers can only retrieve their documents when their contract term is over
- I don't know

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 16 of 35
---	---	------------------

## WAGES, PAYROLL AND DEDUCTIONS

Who will manage the payroll for foreign workers' wages?

- My company
- Another employer (specify below franchisee, holding company, group, etc.)
- Additional Information/Other: \_\_\_\_\_

How will foreign workers be paid? (Choose all that apply)

- Directly in cash
- Directly by company check
- By deposit into the worker's bank account
- In cash cards (debit cards)
- Workers are paid a portion of their wages each pay period and the balance at the end of their contract  
 If this option is selected, please advise what percentage will be held until the end of the contract: \_\_\_\_\_% will be held until the end of the Contract.
- Payment in kind
- I don't know

Will the company hold foreign workers' bank books or have direct access to their bank accounts?

- Yes
- No
- I don't know

What kinds of deductions will be made from foreign workers' wages? (Choose all that apply)

Deduction	Frequency of deduction	Deduction made by:
Food		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Housing		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Communications (internet, telephone, mail, etc.)		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Transportation to and from the workplace		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Recruitment fees		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 17 of 35
---	---	------------------

Visa processing fees		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Fines for breaking rules		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Repayment of loans		<input checked="" type="checkbox"/> Company <input type="checkbox"/> Other: _____
Uniforms		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Tools		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Medical treatment for workplace injuries		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Government mandated insurance schemes		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Personal protective equipment (PPE)		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Mandatory savings		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Government taxes		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____
Government mandated bond or levy		<input type="checkbox"/> Company <input type="checkbox"/> Other: _____

## HOUSING

Who will provide foreign worker housing?

- My company
- Another employer (franchisee, holding company, group, etc.)
- The worker
- Housing is not provided for workers
- Additional Information/Other: \_\_\_\_\_

Who will pay for foreign workers' housing?

- My company
- Another employer (franchisee, holding company, group, etc.)
- The worker
- Additional Information/Other: \_\_\_\_\_



<p><b>PARSONS</b> Federal Standard Legal</p>	<p>Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p>Page 18 of 35</p>
--	---	--------------------------

Who will manage housing for foreign workers?

- My company
  - Another employer (franchisee, holding company, group, etc.)
  - The worker
  - Additional Information/Other:
- 

Will your company place any restrictions on workers' ability to come and go freely from their housing?

- Yes
- No
- I don't know

This is the end of form C..  
Thank You!

<p><b>PARSONS</b> Federal Standard Legal</p>	<p>Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p>Page 19 of 35</p>
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## D. RECEIVING-COUNTRY AGENT QUESTIONNAIRE – RECRUITMENT

### RECEIVING-COUNTRY LABOR AGENT PROFILE

Labor Agent Full Legal Name: \_\_\_\_\_

Name by which Labor Agent  
operates/is known, if different: \_\_\_\_\_

Street address 1: \_\_\_\_\_

Street address 2: \_\_\_\_\_

City: \_\_\_\_\_

Province: \_\_\_\_\_

Postal Code: \_\_\_\_\_

Country: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

Website: \_\_\_\_\_

Tax ID #: \_\_\_\_\_

Date of Incorporation: \_\_\_\_\_

<p style="text-align: center;"><b>PARSONS</b> Federal Standard Legal</p>	<p style="text-align: center;">Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p style="text-align: center;">Page 20 of 35</p>
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Recruitment License Number: \_\_\_\_\_

Date license was issued: \_\_\_\_\_

Issuing agency: \_\_\_\_\_

Names and positions of principals at agency: \_\_\_\_\_

Names of key contacts at agency for your company: \_\_\_\_\_

Affiliated labor agency:<sup>1</sup> \_\_\_\_\_

- Nature of affiliation:
- Affiliated agent is subsidiary
  - Affiliated agent is parent company
  - Affiliated agent shares parent company
  - Other \_\_\_\_\_

The following questions are for foreign workers who will be **recruited** and/or **hired** by this receiving-country agent. If this receiving country agent will not recruit or hire any foreign workers, please skip Section D.

<sup>1</sup> Please list here only agents that are directly affiliated with this agency (as subsidiaries, parent companies, or other). Other agents that will work with this agency to recruit workers should be recorded in qualifying question 2 below.

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 21 of 35
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**SERVICES PROVIDED BY RECEIVING-COUNTRY AGENT** What services related to foreign workers will be provided to your company by this labor agent? (Please check all that apply).

- Foreign worker quota approval
- Identification of sending country agents
- Signing of contract with sending country agent
- Execution of power of attorney to sending country agent
- Demand set attestation
- Issuing of demand letter to sending country agents
- Work permit and other immigration documentation
- Residency permit and/or police clearances
- Post-arrival orientation & on-boarding
- Hostel accommodation
- Transportation between hostel and workplace
- Medical attention and welfare care
- Payroll services and salary payment
- Management at workplace
- Employer of record\*
- Repatriation to home country
- Other: \_\_\_\_\_

What other agents will this labor agent work with (either in the sending country or those that provide onsite management services) in order to provide workers? Please indicate numbers of workers of each nationality.

Name of Agent	Country of Base Operations	Nationality of Workers Supplied

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 22 of 35
---	---	------------------

## SUBCONTRACTOR—RECEIVING-COUNTRY AGENT RELATIONSHIP: CONTRACT AND FEES

Do you have a contract with this labor agent? If yes, please append.

- Yes
- No
- I don't know

For foreign workers who will be recruited, hired, managed or employed by this labor agent, who pays for the cost associated with each of the following processes? Please indicate amounts to be paid by the subcontractor, labor agent, and the worker, for each item. Please also indicate to whom the payment is rendered.

		Subcontractor	Agent	Worker	Comment
Fee to agent, for onsite management or recruitment services rendered	Amount paid: (Please specify currency)				
Demand set attestation	Amount paid: (Please specify currency)				
	To whom paid:				
Visa	Amount paid: (Please specify currency)				
	To whom paid:				
Post-arrival medical exam	Amount paid: (Please specify currency)				
	To whom paid:				
Receiving country government mandated fees, levies, and insurance	Amount paid: (Please specify currency)				

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 23 of 35
---	---	------------------

	To whom paid:				
Trade or skills testing and associated worker travel	Amount paid: (Please specify currency)				
	To whom paid:				
Airfare to country of employment	Amount paid: (Please specify currency)				
	To whom paid:				
Work permit and other immigration documentation	Amount paid: (Please specify currency)				
	To whom paid:				
Residency/police clearance	Amount paid: (Please specify currency)				
	To whom paid:				
Housing	Amount paid: (Please specify currency)				
	To whom paid:				
Medical attention and welfare care	Amount paid: (Please specify currency)				
	To whom paid:				
Return and repatriation	Amount paid: (Please				

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<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 24 of 35
---	---	------------------

	specify currency)				
	To whom paid:				

Will this labor agent pay you or provide you with any incentive to secure a contract?

- Yes
- No
- I don't know

If yes, what is the value?

\_\_\_\_\_

Comment:

\_\_\_\_\_

### FEES, DEPOSITS & BONDS PAID BY FOREIGN WORKERS (RECEIVING-COUNTRY AGENT)

Note the questions in this section refer to workers who will be recruited, hired, managed or employed by this receiving-country labor agent.

Will foreign workers pay a recruitment fee (also known as job application or reservation fee) to this labor agent in order to obtain a job? (Note this refers only to fees paid for services rendered and does not include paying for the cost of the visa, work permit, etc.)

- Yes
- No
- I don't know

If yes, please indicate the amount and currency to be paid.

Amount of recruitment or reservation fee: \_\_\_\_\_

Will foreign workers be required to deposit money or other collateral or post any kind of bond with this labor agent prior to becoming employed?

- Yes
- No
- I don't know

Will foreign workers borrow money directly from this labor agent in order to pay recruitment-related expenses?

- Yes
- No
- I don't know

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 25 of 35
---	---	------------------

The following questions are for foreign workers who will be **managed** and/or **employed** by this receiving-country agent. If this receiving country agent will not manage or employ any foreign workers, stop here. You do not need to fill out the rest of Form D.

## WORKER CONTRACT

Who will foreign workers sign an employment contract with? (check all that apply)

- The receiving-country agent
- The sending-country agent  
Agent name: \_\_\_\_\_
- My company
- Another employer (franchisee, holding company, group, etc.)
- We do not use employment contracts
- I don't know
- Additional Information/Other: \_\_\_\_\_

Please append a sample of the employment contract.

When will foreign workers be given a copy of their employment contract?

- At least five days before departure from their home country
- Less than five days before departure from their home country
- Upon arrival in the receiving country (location of work)
- Workers are not given copies of their contracts
- I don't know
- Additional Information/Other: \_\_\_\_\_

## IDENTITY DOCUMENTS

Who holds foreign worker identity documents (passports or national identity cards etc.)? (Choose all that apply)

- The receiving-country labor agent
- My company
- The worker
- Other \_\_\_\_\_

How are foreign worker identity documents handled? (Choose all that apply)

- My company or agent keeps only photocopies of identity documents and the worker keeps the originals in his or her possession
- It is mandatory that workers turn in their identity documents to the company for safekeeping
- It is mandatory that workers turn in their identity documents to the receiving-country agent for safekeeping



<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 26 of 35
---	---	------------------

- Workers can choose to have the company hold their documents for safekeeping or to keep their documents in their possession
- Workers can choose to have the receiving-country agent hold their documents for safekeeping or to keep their documents in their own possession
- I don't know
- Additional Information/Other: \_\_\_\_\_

If the agent or company holds identity documents, how do workers retrieve them? (Choose all that apply)

- Workers can retrieve them right away for any reason
- Workers can retrieve them if they provide a pre-approved justification
- Workers can retrieve them for any reason, but only during specified hours and/or with a notice period
- Workers can only retrieve their documents when they return to their home country for a visit
- Workers have to pay a deposit in order to retrieve their passport
- Workers can only retrieve their documents when their contract term is over
- I don't know
- Additional Information/Other: \_\_\_\_\_

## WAGES, PAYROLL AND DEDUCTIONS

Who is the employer of record for foreign workers?

- The receiving-country labor agent  
Agent name: \_\_\_\_\_
- My company
- Another employer ((franchisee, holding company, group, etc.)

How will foreign workers be paid? (Choose all that apply)

- Directly in cash
- Directly by company check
- By deposit into the worker's bank account
- In cash cards (debit cards)
- Workers are paid a portion of their wages each pay period and the balance at the end of their contract  
If this option is selected, please advise what percentage will be held until the end of the contract:  
\_\_\_\_\_ % will be held until the end of the Contract.
- Payment in kind
- I don't know

<p><b>PARSONS</b> Federal Standard Legal</p>	<p>Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p>Page 27 of 35</p>
--	---	--------------------------

Will the company or receiving-country labor agent hold workers' bank books or have direct access to their bank accounts?

- Yes, my company
- Yes, receiving-country agent name: \_\_\_\_\_
- No
- I don't know

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 28 of 35
---	---	------------------

What kinds of deductions will be made from foreign workers' wages? (Choose all that apply)

Deduction	Amount deducted	Frequency of deduction	Deduction made by:
Food			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Housing			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Communications (internet, telephone, mail, etc.)			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Recruitment fees			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Visa processing fees			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Fines for breaking rules			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Repayment of loans			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 29 of 35
---	---	------------------

Personal protective equipment, Uniforms, or Tools			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Medical treatment			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Government mandated insurance schemes			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Mandatory savings			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Government taxes			<input type="checkbox"/> Company <input type="checkbox"/> Receiving-country agent <input type="checkbox"/> Company on behalf of receiving-country agent <input type="checkbox"/> Other: _____
Government mandated bond or levy			
<input type="checkbox"/> There are no deductions from workers' wages <input type="checkbox"/> I don't know <input type="checkbox"/> Additional Information/Other: _____			

<p><b>PARSONS</b> Federal Standard Legal</p>	<p>Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p>Page 30 of 35</p>
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## HOUSING

Who will provide foreign worker housing?

- My company
- Another employer (franchisee, holding company, group, etc.)
- The worker
- The receiving-country labor agent
- Housing is not provided for workers
- Additional Information/Other: \_\_\_\_\_

Who will pay for foreign workers' housing?

- My company
- Another employer (franchisee, holding company, group, etc.)
- The worker
- The receiving-country labor agent

This is the end of form D. RECEIVING-COUNTRY AGENT QUESTIONNAIRE.

Thank You!

<p><b>PARSONS</b> Federal Standard Legal</p>	<p>Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p>Page 31 of 35</p>
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## E. SENDING-COUNTRY AGENT QUESTIONNAIRE

### SENDING-COUNTRY LABOR AGENT PROFILE

Labor Agent Full Legal Name: \_\_\_\_\_

Name by which Labor Agent operates/is known, if different: \_\_\_\_\_

Street address 1: \_\_\_\_\_

Street address 2: \_\_\_\_\_

City: \_\_\_\_\_

Province: \_\_\_\_\_

Postal Code: \_\_\_\_\_

Country: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

Website: \_\_\_\_\_

Tax ID #: \_\_\_\_\_

Date of Incorporation: \_\_\_\_\_

Recruitment License Number: \_\_\_\_\_

Date license was issued: \_\_\_\_\_

Issuing agency: \_\_\_\_\_

Names and positions of principals at agency: \_\_\_\_\_

\_\_\_\_\_

Names of key contacts at agency for your company: \_\_\_\_\_

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 32 of 35
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Affiliated labor agency: 2

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- Affiliated agent is subsidiary
- Affiliated agent is parent company
- Affiliated agent shares parent company
- Other \_\_\_\_\_

Nature of affiliation:

### SERVICES TO BE PROVIDED BY SENDING-COUNTRY AGENT

What services will be provided to your company by this labor agent?

- Advertising
- Recruitment/identification
- Pre-screening
- Pooling
- Trade/skills testing
- Selection
- Contracting/hiring
- Visa & immigration document processing
- Emigration documentation
- Medical exam
- Providing housing/shelters before departure
- Pre-departure orientation
- Travel to country of employment
- Other: \_\_\_\_\_

**What other agents will this labor agent work with, in order to provide workers?**

Name of Agent	Country of Base Operations	Nationality of Workers Supplied

<sup>2</sup> Please list here only agents that are affiliated with this agency (as subsidiaries, parent companies, or other), NOT agents that work with this agency to recruit workers to this property. Those agents should be recorded in qualifying question 2 below.

<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 33 of 35
---	---	------------------

**SUBCONTRACTOR—SENDING-COUNTRY AGENT RELATIONSHIP: CONTRACT AND FEES**

Do you have a contract with this labor agent? If yes, please append a copy of the attested document.  Yes

No

I don't know

If no, does the receiving-country agent have a contract with this labor agent?

Yes

No

I don't know

For workers who will be recruited or hired by this sending-country labor agent, who will pay for the cost associated with each of the following processes? Please indicate amounts paid by the Subcontractor, labor agent, and the worker, for each item. Please also indicate to whom the payment will be rendered.

		Subcontractor	Agent	Worker
Fee to agent, for onsite management or recruitment services rendered	Amount paid: (Please specify currency)			
Exit visa or clearance	Amount paid: (Please specify currency)			
	To whom paid:			
Pre-departure medical exam or vaccinations	Amount paid: (Please specify currency)			
	To whom paid:			
Sending country government mandated fees, levies, and insurance	Amount paid: (Please specify currency)			
	To whom paid:			
Trade or skills testing and associated worker travel	Amount paid: (Please specify currency)			
	To whom paid:			
Airfare to country of employment	Amount paid: (Please specify currency)			
	To whom paid:			



<b>PARSONS</b> Federal Standard Legal	Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021	Page 34 of 35
---	---	------------------

Will this labor agent pay you or provide you with any incentive to secure a contract?

- Yes  
 No  
 I don't know

If yes, what is the value?

\_\_\_\_\_

Comment:

\_\_\_\_\_

## FEES, DEPOSITS & BONDS PAID BY FOREIGN WORKERS (SENDING-COUNTRY AGENT)

The following questions refer to workers who will be recruited or hired by this sending-country labor agent.

Will foreign workers pay a recruitment fee (also known as job application or reservation fee) to this labor agent in order to obtain a job? (Note this refers only to fees paid for services rendered and does not include paying for the cost of the visa, work permit, etc.)

- Yes  
 No  
 I don't know

If yes, please indicate the amount and currency paid.

Amount of recruitment or reservation fee: \_\_\_\_\_

Will foreign workers required to deposit money or other collateral or post any kind of bond with this labor agent prior to becoming employed?

- Yes  
 No  
 I don't know

Will foreign workers be required to leave original documentation with this agent while they're employed with your company/for the duration of their employment abroad?

- Yes  
 No  
 I don't know

Will foreign workers borrow money directly from this labor agent in order to pay recruitment-related fees or expenses?

<p><b>PARSONS</b> Federal Standard Legal</p>	<p>Combatting Trafficking in Persons (CTIP) Guidebook Rev. 0 Effective Date: 11/24/2021</p>	<p>Page 35 of 35</p>
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- Yes
- No
- I don't know

Will any deductions from foreign workers' wages be made on behalf of the sending-country labor agent?

- Yes
- No
- I don't know

If yes, please indicate the reason for the deduction

- Loan payment
- Other: \_\_\_\_\_

This is the end of form E. SENDING-COUNTRY AGENT QUESTIONNAIRE.