



ESSENTIAL GUIDE

Compliance Training Guidance for US Government Contractors

The US Government provides contractors with strong guidance about compliance training.

Introduction

Much of the guidance and rules are codified in the Federal Acquisition Regulation (FAR), which serves as the main regulation covering federal agency procurement contracts. The FAR provisions are standard parts of federal procurement contracts, listed by name and number and wholly incorporated into a contract. Other agencies also have FAR Supplements (e.g., DFARS – Defense Federal Acquisition Regulation Supplement).

Several of these FAR provisions reference training requirements and recommendations for US Government contractors and sometimes their subcontractors.¹ Related to the FAR, US Government agencies provide guidance on compliance awareness and training, often derived from legislation and Executive Orders.

Typically, these expectations focus on contractors and subcontractors based on contract size and number of employees, and construction contractors and subcontractors may have modified requirements.

This article covers key training areas for US Government contractors:

- Affirmative Action
- Discrimination
- Harassment
- Diversity, Equity, and Inclusion
- Code of Business Ethics and Conduct
- Combatting Trafficking in Persons
- Data Privacy
- A Drug-Free Workplace



Topic	Expectation	Audience	Periodicity
Affirmative Action	Strongly recommended	Individuals involved in recruiting and managing others	Annually
Discrimination	Recommended	Managers, possibly non-managers	“Regularly” and annually
Harassment	Recommended; required in certain jurisdictions	All employees	Annually, biannually and “regularly”
Diversity, Equity, and Inclusion	Recommended	All employees	Not indicated
Code of Business Ethics and Conduct	Required; recommended	All employees	Periodically
Combatting Trafficking in Persons	Required	All employees	Not indicated
Data Privacy	Required	All employees	Annually
Drug-Free Workplace	Required	All employees	“Ongoing”

¹ This article uses “contractors” to also refer to subcontractors, where applicable in the government rules.

Affirmative Action

With greater diversity of the US population, and increased recognition of certain groups and their importance to the workforce, the US Government continues to promote equal employment protections and opportunities, especially with federal government contractors. A series of statutes, implementing regulations and executive orders make up the law(s) requiring covered government contractors to promote equal employment opportunities and take affirmative actions to recruit and advance qualified women, minorities, persons with disabilities, and covered veterans.

Covered government contractors are those who must develop affirmative action programs (AAPs). Executive Order 11246 and Section 503 of the Rehabilitation Act of 1973 ("Section 503") require AAPs for employers with 50 or more employees and at least one contract of at least \$50,000. The Vietnam Era Veterans' Readjustment Assistance Act ("VEVRAA") require AAPs for those employers with 50 or more employees and at least one contract of at least \$150,000.

According to the Department of Labor, education on the AAP is necessary for personnel involved in employment lifecycle processes (e.g., recruitment, promotion, discipline). Such employees can include recruiters, leadership, and line managers. Contractors may consider training all employees so they understand the organization's commitment to equal employment opportunity and affirmative action in employment, provide suggestions for improvement and raise concerns that could otherwise lead to the organization failing to meet the government's expectations.

Syntrio's Affirmative Action Program for Government Contractors can be rolled out for various audiences in your workplace, and to support the required Office of Federal Contract Compliance Programs (OFCCP) equal employment opportunity and affirmative action education efforts. See also Syntrio training related to the following topics:

- Employment Non-Discrimination
- Unconscious Bias
- Diversity & Inclusion



Affirmative Action	
Impacted US Government Contractors Contractors required to have AAPs	Details Written AAP Component: Training “All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes must be knowledgeable about the contractor’s EEO obligations and affirmative action commitments under Section 503 and VEVRAA.” (<i>OFCCP Supply and Service Contractors Technical Assistance Guide, November 2020, p. 58</i>) As a remedy for identified AAP problems, OFCCP suggests “Conducting periodic affirmative action and equal opportunity training for all individuals involved in the selection process.” (<i>OFCCP Supply and Service Contractors Technical Assistance Guide, November 2020, p. 45</i>) 41 CFR Part 60-741 (Appendix B to Part 60-741—Developing Reasonable Accommodation Procedures) “Training. The contractor should provide annual training for its supervisors and managers regarding the implementation of the reasonable accommodation procedures. Training should also be provided whenever significant changes are made to the reasonable accommodation procedures. Training regarding the reasonable accommodation procedures may be provided in conjunction with other required equal employment opportunity or affirmative action training.” § 60-741.43 Affirmative action policy “(iv) Discuss the policy thoroughly in both employee orientation and management training programs...” § 60-741.44 Required contents of affirmative action programs “(j) Training. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in the contractor’s affirmative action program are implemented.” OFCCP Supply and Service Contractors Technical Assistance Guide, November 2020, p. 53 “Discuss the policy during orientation and training.”
Expectation Affirmative Action – Strongly Recommended Reasonable Accommodation – Required	
Frequency Annually	
Audience All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes	
Reference 41 CFR Part 60-741 OFCCP Supply and Services Technical Assistance Guide	

Discrimination and Harassment

Harassment and discrimination complaints continue to plague both federal agencies and the civilian workforce. Surprisingly, more than half of federal sector EEO-related complaints since 2018 include an allegation of harassment. In 2022, the EEOC received 73,485 new discrimination charges, which was an increase of almost 20% over 2021. They handled more than 475,000 calls (an 18% increase from 2021) and managed 32% more emails from the public than in 2021.² The result? The EEOC obtained close to \$40 million from suits it filed for almost 1500 individuals in 2022.³

The OFCCP prohibits applicable US Government contractors from discriminating on the basis of sex (which also includes sexual harassment). Contractors are of course generally subject to Title VII of the Civil Rights Act of 1964 and other state federal laws and local laws prohibiting discrimination. There are other specific areas of law applicable to contractors that also recommend related training, as well as other prevention best practices. Specifically, Executive Order 11246 prohibits US Government contractors engaging in employment discrimination based on race,



² <https://www.eeoc.gov/harassment>

³ <https://www.eeoc.gov/newsroom/eeoc-releases-annual-performance-report-fiscal-year-2022>

color, sex, sexual orientation, gender identity, religion, and national origin. Section 503 of Rehabilitation Act of 1973 prohibits US Government contractors from engaging in employment discrimination based on disability. And VEVRAA prohibits US Government contractors engaging in employment discrimination based on protected veteran status.

The EEOC recommends that all organizations train on workplace harassment as a good practice to prevent it.⁴ The EEOC also uses mandated training as a conciliatory tactic when involved in litigation with employers (including contractors). The agency provides other resources to help employees and others understand employment discrimination and employees' rights in the workplace.⁵

Under federal law, harassment is a form of discrimination and is therefore illegal for US Government contractors. OFCCP recommends sexual harassment training for all employees. Further, FAR

specifically requires construction contractors to “ensure a working environment free of harassment, intimidation, and coercion at all sites and in all facilities where the contractor’s employees are assigned to work.”

What can US Government contractors do to avoid unlawful claims of discrimination and harassment? Train leaders and employees.

It can be difficult to prevent employment discrimination if managers do not understand the standard, what it means in the workplace, and how to make employment decisions that do not consider an individual’s protected characteristics. Disseminating a policy is one step in the process, but how can we be sure this is enough to educate managers? Some contractors may want to train all staff so they can raise concerns regarding suspected employment discrimination they witness or learn about.

For these reasons, Syntrio recommends employment discrimination training for all managers.

Employment Discrimination	
<p>Impacted US Government Contractors All</p>	<p>Details EEOC Website Recommends non-discrimination training for managers and non-managers as posted on its website. www.eeoc.gov/employers/small-business/manager-training-tips www.eeoc.gov/employers/small-business/employee-training-tips</p> <p>OFCCP Supply and Service Contractors Technical Assistance Guide, November 2020, p. 41 Affirmative Action Program officers have a responsibility to ensure presentation of the contractors’ “equal employment opportunity policy during the supervisory training and new employee orientation programs.”</p> <p>41 CFR Part 60-741 “Training. The contractor should provide annual training for its supervisors and managers regarding the implementation of the reasonable accommodation procedures. Training should also be provided whenever significant changes are made to the reasonable accommodation procedures. Training regarding the reasonable accommodation procedures may be provided in conjunction with other required equal employment opportunity or affirmative action training.”</p>
<p>Expectation EEOC – Recommended OFCCP – Recommended</p>	
<p>Frequency Non-Discrimination – “Regularly” Reasonable accommodations – Annually</p>	
<p>Audience All employees, supervisors and leaders</p>	
<p>Reference EEOC website 41 CFR Part 60-741 OFCCP Supply and Service Contractors Technical Assistance Guide</p>	



⁴ <https://www.eeoc.gov/employers/small-business/manager-training-tips> | <https://www.eeoc.gov/employers/small-business/employee-training-tips>

⁵ <https://www.eeoc.gov/outreach-education-technical-assistance>

Harassment	
<p>Impacted US Government Contractors All</p>	<p>Details State Requirements for All Organizations California, New York (New York City has similar requirements), Illinois (Chicago has similar and expanded requirements), Delaware, Maine, Washington, Puerto Rico, Washington, DC all require harassment training to some extent</p> <p>State Recommended for Municipal Entities: Florida, Iowa, Nevada, New Mexico, North Carolina, Oklahoma, Pennsylvania, Tennessee, Texas, Utah</p> <p>State Recommended for All Organizations: Colorado, Hawaii, Maryland, Massachusetts, New Jersey, Ohio, Rhode Island, Vermont, Wisconsin</p> <p>EEOC “An organization must have effective policies and procedures and must conduct effective trainings on those policies and procedures.” EEOC emphasizes the need for training especially for managers. (Select Task Force on the Study of Harassment in the Workplace, June 2016, EEOC)</p> <p>EEOC provides harassment/respectful workplace training to companies for supervisors and all employees through the EEOC Training Institute.</p> <p>OFCCP To meet the requirement that a covered contractor communicates its harassment policy to prevent harassment against individuals with disabilities and covered veterans, a contractor must implement procedures to communicate its anti-harassment policy; OFCCP advises that a contractor can achieve this requirement through “training such as orientation.” (OFCCP Supply and Service Contractors Technical Assistance Guide, November 2020, p. 56)</p> <p>“Although not required by this part, following are best practices for contractors...Providing anti-harassment training to all personnel.” (41 CFR Part 60-20, Appendix)</p>
<p>Expectation Certain States – Required or Recommended EEOC – Strongly recommended OFCCP – Recommended</p>	
<p>Frequency For required states, it varies EEOC – Recommended “regularly” OFCCP – Recommended</p>	
<p>Audience All employees, supervisors and leaders</p>	
<p>Reference State Requirements and Recommendations EEOC Guidance EEOC Select Task Force OFCCP regulations and Guide</p>	

Diversity, Equity, Inclusion, and Accessibility

A close link exists among discrimination, harassment, affirmative action, and diversity, equity, and inclusion, including accessibility (DEIA). Many types of employment discrimination and harassment are directly related to personal biases or to a lack of organizational support for DEI. DEI training and awareness can positively impact affirmative action program metrics.

In an effort to improve DEIA efforts, the EEOC and OFCCP launched the HIRE (Hiring Initiative to Reimagine Equity) initiative in 2022.⁶

HIRE will work to inform workplace DEIA initiatives by developing a better understanding among employers of the needs and challenges faced by various underrepresented communities. Especially now, as employers confront changing labor market dynamics, many are searching for strategies to recruit and hire from new and diverse talent sources. We are committed to helping ensure that as our nation recovers from the pandemic, we build an inclusive economy that works for everyone.⁷

⁶ <https://www.shrm.org/resourcesandtools/hr-topics/behavioral-competencies/global-and-cultural-effectiveness/pages/eec-ofccp-launch-initiative-to-improve-dei-efforts.aspx>

⁷ <https://www.eeoc.gov/hiring-initiative-reimagine-equity-hire-fact-sheet>

Also, the National Industry Liaison Group (NILG), a consortium of US Government contractors and subcontractors that work with OFCCP, focuses on promoting effective affirmative action and equal employment opportunity programs. In recent years, the NILG has placed greater emphasis on the role of diversity, equity and inclusion efforts to support EEO and affirmative action programs. This has become an important topic in webinars and the annual conference agenda.

Given this multi-agency focus on DEI, Syntrio recommends bias and DEI training for all US Government contractors. Our DEI collection provides multiple course versions of varying lengths and areas of focus to support US Government contractors in all stages of their DEI efforts.

Diversity, Equity and Inclusion (and Accessibility)	
Impacted US Government Contractors All	Details EEOC EEOC Training Institute 2021 launches diversity, equity and inclusion workshops for employers EEOC/OFCCP The EEOC/OFCCP 2022 joint HIRE initiative to boost diversity, equity and inclusion in hiring and recruitment OFCCP “CEO Leadership through Correspondence and Video—Clearly communicating diversity and inclusion goals helps eliminate impediments in the employment processes and encourages proactive recruitment.” www.dol.gov/agencies/ofccp/compliance-assistance/outreach/hbcu-initiative/best-practices
Expectation EEOC – Recommended OFCCP – Recommended	
Frequency Not indicated	
Audience Managers; all employees	
Reference EEOC DEI Workshops EEOC and OFCCP HIRE joint initiative US DOL OFCCP “Best Practices for Fostering Diversity & Inclusion”	



Code of Business Ethics and Conduct

An organization’s code of conduct defines the baseline for expected employee conduct, and annual code training is an excellent way to reinforce organizational expectations for your employees and leaders. Just as your written code is an umbrella document addressing many topics, comprehensive code training should provide guidance on multiple topics.

FAR 52.203-13 requires that US Government contractors with contracts of at least \$6 million and a performance period of at least 120 days have in place a code of conduct and an ongoing business ethics awareness and compliance program.



This program shall include reasonable steps to communicate periodically and in a practical manner the contractor’s standards and procedures and other aspects of the contractor’s business ethics awareness and compliance program and internal control system, by conducting effective training programs and otherwise disseminating information appropriate to an individual’s respective roles and responsibilities.

The FAR states this training is mandated for principals, employees, and the contractor’s agents and subcontractors as appropriate, with minimal exceptions (e.g., for small business concerns or if the contract is for the acquisition of a commercial product or commercial service).

How do US Government contractor codes and related training differ from those of strictly commercial organizations? Government contractor codes do tend to contain many provisions similar to those in codes of non-government contractor organizations. For examples, anti-bribery, confidential information, and conflicts of interest topics apply to employees almost anywhere in any type of organization. Government contractors must also address a multitude of additional topics – lobbying, handling of government property, procurement integrity, and more. The FAR requires that training address specific topics applicable to each organization.

The FAR states that a contractor take these steps to periodically communicate the organization’s standards. Typically, we see code of conduct training rolled out annually or biannually for all employees and to new employees upon hiring.

Syntrio’s new Code of Conduct for Government Contractors training supports the FAR requirements and addresses key topics applicable to US Government contractors.

Code of Business Ethics and Conduct	
<p>Impacted US Government Contractors Those with a \$6M+ contract and performance period of 120 days</p>	<p>Details FAR 52.203-13 “This program shall include reasonable steps to communicate periodically and in a practical manner the Contractor’s standards and procedures and other aspects of the Contractor’s business ethics awareness and compliance program and internal control system, by conducting effective training programs and otherwise disseminating information appropriate to an individual’s respective roles and responsibilities.”</p> <p>“Evaluation of Corporate Compliance Programs,” US Department of Justice, Washington DC, updated June 2020. See “Training and Communications” – “Another hallmark of a well-designed compliance program is appropriately tailored training and communications... Prosecutors should assess the steps taken by the company to ensure that policies and procedures have been integrated into the organization, including through periodic training and certification for all directors, officers, relevant employees, and, where appropriate, agents and business partners.”</p> <p>Sentencing Manual, Chapter 8, US Sentencing Commission, Washington, DC, 2021. “The organization shall take reasonable steps to communicate periodically and in a practical manner its standards and procedures, and other aspects of the compliance and ethics program, to the individuals referred to in subparagraph (B) by conducting effective training programs and otherwise disseminating information appropriate to such individuals’ respective roles and responsibilities.”</p>
<p>Expectation FAR – Required DOJ and USSC – Recommended</p>	
<p>Frequency Periodically and in a practical manner (per FAR)</p>	
<p>Audience Principals and employees, and as appropriate, agents and subcontractors</p>	
<p>Reference FAR 52.203-13 DOJ Evaluation of Corporate Compliance Programs USSC Sentencing Manual</p>	

Combatting Trafficking in Persons

Victims of human trafficking number in the tens of millions globally.⁸ Given this statistic, it's not surprising that most US Government contracts and subcontracts include FAR 52.222-50 and require that all government contractors notify their employees and agents of the US Government's policy against human trafficking.

In addition, compliance plans must be maintained by contractors holding any portions of contracts that are in excess of \$500k for supplies (other than commercial-off-the-shelf products) acquired outside of the United States or services to be performed outside the United States.

And while Combatting Trafficking in Persons (CTIP) requirements are contract specific, pertinent contractors may find it simpler to establish an organization-wide program. US Government contractors not falling under the FAR CTIP requirements but seeking to adopt best practices may choose to implement these compliance plans or at least provide employee training.⁹

One required component of the CTIP compliance plan is an awareness program. Due to continued increases in human trafficking, changes in trafficking risks, and the benefit of regular refreshers to reinforce the value of training, Syntrio recommends that contractors consider periodic training on human trafficking. Syntrio's highly popular Combatting Trafficking in Persons for Government Contractors awareness training course is an integral part of any government contractor's awareness program.



Combatting Trafficking in Persons	
<p>Impacted US Government Contractors Compliance plan applies to any portions of contracts for supplies, other than commercially available off-the-shelf items, acquired outside the United States, or services to be performed outside the United States; and that have an estimated value that exceeds \$500k.</p>	<p>Details From the FAR: “(2) The Contractor shall maintain a compliance plan during the performance of the contract that is appropriate-(i) To the size and complexity of the contract; and (ii) To the nature and scope of the activities to be performed for the Government, including the number of non-United States citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.”</p> <p>“Minimum requirements. The compliance plan must include, at a minimum, the following . . . an awareness program to inform contractor employees about the Government's policy prohibiting trafficking-related activities described in paragraph (b) of this clause, the activities prohibited, and the actions that will be taken against the employee for violations. “</p>
<p>Expectation Required (CTIP awareness program)</p>	
<p>Frequency Not stated</p>	
<p>Audience Employees covered by compliance plan</p>	
<p>Reference FAR 52.222.50</p>	

⁸ With an estimated 27.6 million victims worldwide at any given time, human traffickers prey on people of all ages, backgrounds, and nationalities, exploiting them for their own profit. <https://www.state.gov/humantrafficking-about-human-trafficking>

⁹ <https://www.ropesgray.com/en/newsroom/alerts/2019/12/anti-human-trafficking-compliance-guidance-for-us-government-contractors-published>

Data Privacy

Ransomware attacks continue to skyrocket; 83% of organizations experienced more than one data breach during 2022.¹⁰ We continue to see this rise in hacking and cyber threats. Often, the target is personal information that can be used to steal identities and abet financial crimes. As a result, organizations are seriously focused on protecting their systems and personal data stored there. US Government contractors are now required to provide annual data privacy training.

The FAR mandates that US Government contractors train pertinent employees annually. Training must be role based and provide basic as well as more advanced levels of knowledge. Training also must include testing of trainee knowledge.

For government contractors, privacy training must be provided before employees are given access to personal information records. Required training content is quite specific, including the provisions of the Privacy Act of 1974, penalties for violations, and procedures to follow in the event of a suspected or confirmed breach of records or personally identifiable information (PII).

Syntrio provides various data privacy, cybersecurity, and insider threat training courses. Syntrio's Data Privacy for Government Contractors includes training on data privacy and is fully compliant with the FAR requirements.



Data Privacy	
<p>Impacted US Government Contractors Contractors with employees who fall into audience requirements; all GSA contractors</p>	<p>Details FAR 52.224.-3 (1) "Privacy training shall address the key elements necessary for ensuring the safeguarding of personally identifiable information or a system of records. The training shall be role-based, provide foundational as well as more advanced levels of training, and have measures in place to test the knowledge level of users. At a minimum, the privacy training shall cover—</p> <p>(i) The provisions of the Privacy Act of 1974 (5 U.S.C. 552a), including penalties for violations of the Act;</p> <p>(ii) The appropriate handling and safeguarding of personally identifiable information;</p> <p>(iii) The authorized and official use of a system of records or any other personally identifiable information;</p> <p>(iv) The restriction on the use of unauthorized equipment to create, collect, use, process, store, maintain, disseminate, disclose, dispose or otherwise access personally identifiable information;</p> <p>(v) The prohibition against the unauthorized use of a system of records or unauthorized disclosure, access, handling, or use of personally identifiable information; and</p> <p>(vi) The procedures to be followed in the event of a suspected or confirmed breach of a system of records or the unauthorized disclosure, access, handling, or use of personally identifiable information (see OMB guidance for Preparing for and Responding to a Breach of Personally Identifiable Information)."</p>
<p>Expectation Required</p>	
<p>Frequency Initial and annually thereafter</p>	
<p>Audience Employees who: 1. Have access to a system of records; 2. Create, collect, use, process, store, maintain, disseminate, disclose, dispose, or otherwise handle personally identifiable information on behalf of the agency; or 3. Design, develop, maintain, or operate a system of records</p>	
<p>Reference FAR 52.224-3</p>	

¹⁰ <https://hbr.org/2023/05/the-devastating-business-impacts-of-a-cyber-breach>

Drug-Free Workplace

Drug and alcohol abuse continue to create problems in the workplace. Workplace accidents are increasing due to illegal or improper drug use. According to the US Bureau of Labor Statistics, 58.1% of workplace fatalities due to exposure to harmful substances or environments were caused by non-medical use of alcohol or drugs.¹¹

Drug and alcohol abuse in the workplace, can create problems:

- Most importantly, misuse and abuse risk the safety of employees when accidents occur. It also can affect employees' health, leading to sick leave and needed medical care.
- Employee substance abuse problems can lead to theft of funds and other assets to support a drug habit.
- It also affects an organization's product and service quality due to inattentive staff struggling with abuse problems.
- Finally, it affects the productivity and morale of the entire workplace, not just employees dealing with the substance abuse. Trust among coworkers diminishes.

For government contractors, the problems can be exacerbated. National security is a risk when

employees who abuse drugs or alcohol engage in risky behavior to support a habit.

Current statistics related to drugs in the workplace are impactful not only for employees with substance abuse issues, but other employees are at risk for injuries or burnout from covering for employees who may be absent.

US Government contractor employers face suspension, termination and debarment if not in compliance with FAR 52.223-6 (Drug-Free Workplace).

The FAR requires that contractors provide a drug-free awareness program, specifically training, if they have government contracts of \$100k+ or receive a government grant of any size. The awareness program must cover information regarding the danger of substance use in the workplace; the organization's drug-free workplace policy requirements and penalties for non-compliance; and relevant information about any counseling, rehabilitation, and assistance programs available to employees.

Syntrio's A Drug-Free Workplace for Government Contractors training is fully compliant with all requirements of the awareness program.

Drug-Free Workplace	
Impacted US Government Contractors Contracts of \$100k+	Details Drug-Free Workplace Act of 1988 (FAR 52.223-6) Per FAR, contractors must establish an ongoing drug-free awareness program to inform covered employees about— <ul style="list-style-type: none"> (i) The dangers of drug abuse in the workplace; (ii) The Contractor's policy of maintaining a drug-free workplace; (iii) Any available drug counseling, rehabilitation, and employee assistance programs; and (iv) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace
Expectation Required	
Frequency Ongoing per FAR	
Audience Employees of contractors directly engaged in the performance of work under a Government contract.	
Reference Drug-Free Workplace Act of 1988 FAR 52.223-6	



¹¹ <https://www.bls.gov/opub/ted/2023/unintentional-overdoses-rose-for-the-ninth-consecutive-year-in-2021.htm#:~:text=Unintentional%20overdoses%20from%20nonmedical%20use%20of%20drugs%20or%20alcohol%20represented,than%20in%20the%20prior%20year.>



ABOUT SYNTRIO

Syntrio is a global leader in governance, risk, compliance and human resource solutions that help more than 6,500 organizations make the workplace a better place. Syntrio solutions include a comprehensive ethics reporting hotline and case management system, and seven modern training libraries in Employment Law and Harassment, Ethics and Compliance, Diversity and Inclusion, Health and Safety, Business Skills, Cybersecurity, and Hotline Learning.

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