

Caddell Construction Combating Trafficking in Persons Plan

This plan establishes a framework to prevent trafficking in persons to maintain compliance with FAR 52.222-50. This plan supports employee and worker awareness through applicable resources, including the FAR, Special Contract Amendments, and the Department of State guidance. The CTIP plan addresses and applies to employees, recruiters, subcontractors, labor providers, and other project personnel. The program is periodically reviewed for updates, if needed.

Awareness:

To inform Caddell employees about the US Government's policy prohibiting trafficking related activities, the following steps shall be taken:

1. Include FAR 52.222-50 in the Caddell Business Ethics Guidelines.
2. Annual CTIP training of Caddell project management and employees.
3. Initial training of TCNs, CAWs and Subcontractors on CTIP per FAR 52.222-50 will be provided.
4. Inform Caddell staff of their mandatory duty to disclose knowledge of TIP related activities.
5. Prior to engagement, verify that any recruiting agency used for TCNs complies with CTIP requirements. Due diligence should include reviewing licenses, contracts, fee practices, worker communications, grievance mechanisms, and prior compliance history, with documentation retained to demonstrate ongoing oversight. Include FAR 55.222-50 in contracts with recruitment agencies for work performed by TCNs.
6. An informational poster to include the Caddell, Global Trafficking, and OIG hotline/web reporting will be posted for each jobsite and residential area. Posters will be displayed in private and common areas to include the Caddell's website.
7. Project staff will be provided with, and sign for, a copy of a 'Know Your Rights' pamphlet. Translations available on the U.S. Department of State website.

Employee Reporting:

Employees shall report activities inconsistent with the policies prohibiting trafficking in persons to:

Caddell Hotline at 1-800-845-1318 or TIPS@Caddell.com

Global Human Trafficking Hotline at 1-844-888-FREE or HELP@BEFREE.ORG

Office of Inspector General Hotline at 1-800-409-9926 or OIGHOTLINE@state.gov

Retaliation, in any form, for reports of alleged misconduct or impropriety is strictly prohibited by Caddell's policy. Caddell will comply with the requirements of the Federal Acquisitions Regulations regarding protections afforded to those who make disclosures of suspected wrongdoing.

An informational poster including the Caddell and Global Trafficking Hotline number will be posted on the company's website, at each jobsite and housing areas. The poster will be translated into the most predominant languages of workers on site to ensure awareness.

Recruitment And Wage Plans:

Caddell will not charge any recruited employees a recruitment fee or similar fees. Caddell's recruitment practices will meet contractual requirements. Practices will also comply with the local recruiting nation and host country labor laws. Caddell shall only use bona fide recruitment companies. The recruitment and wage plan will be evaluated and modified as necessary to meet contractual obligations on a project-by-project basis.

Housing Plan:

Caddell has successfully established workers camps on major international projects and housing plans will meet contractual requirements and/or comply with host country laws. Specific provisions of the housing plans may be modified/waived, by the Contracting Officer, as necessary to meet contractual obligations on a project-by-project basis.

Subcontractor Compliance:

Caddell will employ the following procedures to prevent subcontractors from engaging in trafficking related activities and to facilitate compliance with FAR 52.222-50:

- (1) The provisions of FAR 52.222-50 will be incorporated into all subcontracts and in all contracts with agents, regardless of dollar value, location, or the nationality of workers involved. The compliance plan requirements within those subcontracts apply only to portions of subcontracts and contracts with agents meeting the threshold at H.50.1.
- (2) Subcontractors shall certify *annually* that they have not engaged in trafficking-related activities *or* if abuse has been found that remedial steps have been taken consistent with FAR 52.222-50(b).
- (3) Consistent with Special Contract Requirements H 50 and H 51.1.7, Subcontractors shall *certify* prior to award of subcontract, and annually thereafter, that they have implemented a compliance plan to combat trafficking in persons that is appropriate to the size and complexity of the contract.

Additional information about Trafficking in Persons can be found on the website for the Department of State's Office at www.state.gov/federal-antitrafficking-resources/