



US Human Trafficking Policy

WSP USA (“hereinafter “our Organization”) adopts the US federal government’s Combatting Trafficking in Persons policy. The policy applies to all employees directly working on US federal projects. Federal law also requires our Organization to ensure that our subconsultants, subcontractors, vendors, suppliers and their employees, business partners, agents and others working on their behalf and retained by our Organization to perform work on federal projects (collectively “Third Parties”) either agree to follow our US Human Trafficking Policy (hereinafter “the Policy”) or have in place their own policy satisfying the US federal government’s Combatting Trafficking in Persons policy found at FAR 52.222-50. Third Parties may decide whether to adopt this Policy or its own. For the duration of an employee’s or Third Party’s work on a federal contract, the prohibitions expressed in this Policy apply at all times, including during non-working hours. A Compliance Plan will be adopted for individual contracts exceeding \$500,000 for supplies acquired outside of the United States or services to be performed outside the United States and governed by Federal Acquisition Regulations. When applicable, Project Managers pursuing federal contracts that trigger the need for a Compliance Plan must seek guidance from Legal or Compliance regarding the preparation of the Compliance Plan and monitoring and reporting requirements related thereto.

This Policy incorporates by reference the prohibitions and definitions set forth in FAR 52.222-50. Specifically, our Organization, its employees directly working on a federal project, and our Third Parties, either by adhering to this Policy or their own equivalent policy, will:

- not engage in severe forms of trafficking in persons, procure commercial sex acts, or use forced labor. This prohibition includes the procurement of commercial sex acts in jurisdictions where the procurement of sex acts is legal so long as said employees and Third Parties are working on federal projects.
- allow employee access to their identity or immigration documents.
- provide employees, including potential employees, work documents in a language and format accessible to the employee.
- use open and fair recruitment practices and disclose basic information regarding the key terms and conditions of employment such as wages and fringe benefits, the location of work, the living conditions, housing and associated costs, any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work.
- use recruiters who comply with local labor laws of the country in which the recruiting takes place.
- not charge employees recruitment fees.
- provide an employment contract, recruitment agreement, or other required work document in writing when required by law or contract.
- when relocation is required for work, provide employees work documents at least five days prior to relocation. Work documents shall include, but are not limited to, details about work description, wages, prohibition on charging recruitment fees, work locations, living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.
- provide or arrange housing that meets the host country housing and safety standards.
- provide return transportation upon the end of employment for employees who are not a national of the country in which the work is taking place and who were brought into that country for the purpose of working on a US Government contract or subcontract. For employees who are not US nationals, and who were brought into the United States for the purpose of working on a US Government contract or subcontract, return transportation will be provided if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee.

Anyone with reason to believe that our Organization or its Third Parties have violated this Policy shall report the suspected violation to their supervisor, Human Resources, Legal, or Compliance immediately. Reports of suspected violations may also be made to EXPOLINK at 1-877-533-5310, wsp@expolink.co.uk or <http://expolink.co.uk/whistleblowing/submit-a-report/>. Our Organization provides protection against retaliation for anyone who makes a report in good faith.

Sanctions for violation of this Policy requirement may include, but are not limited to, removal from the contract, reduction in benefits, or termination of employment.