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## **Combating Trafficking in Persons (CTIP) Policy and Compliance Plan**

### **1. Overview**

Unitec has a zero-tolerance policy regarding trafficking in persons. Unitec opposes any form of human trafficking, including slavery, sex trafficking, involuntary servitude, forced or compulsory labor, child labor, and any related activities. We find these activities inherently harmful and dehumanizing. No employee nor any Unitec agent, subcontractor, vendor, or supplier shall solicit, obtain, or be involved in such activities. If any employee, agent, or subcontractor is found to have engaged in such behaviour, Unitec will take appropriate action, up to and including termination of employment or severance of services.

### **2. Policy**

In accordance with Federal Acquisition Regulation (FAR) 52.222-50, Unitec has developed this Combating Trafficking in Persons – Policy and Compliance Plan (the "Plan") to be implemented on United States (U.S.) Government contracts or subcontracts for supplies, other than commercially available off-the-shelf (COTS) items, acquired outside the U.S. or services to be performed outside the U.S. and has an estimated value that exceeds \$550,000. The purpose of this Plan is to ensure employees, agents, and subcontractors are aware of prohibited conduct under Combating Trafficking in Persons regulations and laws, as well as actions that may result from violations.

### **3. Prohibited Activities**

Unitec fully supports the U.S. Government's policy prohibiting trafficking in persons, and strictly prohibits employees, agents, and subcontractors from:

1. Engaging in severe forms of trafficking in persons during the period of performance of the contract;
2. Procuring commercial sex acts during the period of performance of the contract;
3. Using forced labor in the performance of the contract;
4. Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
5. (i) Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language understood by the employee or potential employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee or potential employee, and, if applicable, the hazardous nature of the work;

- (ii) Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- 6. Charging employees and potential employees' recruitment fees;
- 7. (i) Failing to provide return transportation or pay for the cost of return transportation upon the end of employment—
  - A. For an employee who is not a national of the country in which the work is taking place and who was brought into that country to work on a U.S. Government contract or subcontract (for portions of contracts performed outside the United States); or
  - B. For an employee who is not a United States national and who was brought into the United States to work on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the United States); except that—
- (ii) The requirements of paragraphs (b)(7)(i) of this clause shall not apply to an employee who is—
  - A. Legally permitted to remain in the country of employment and who chooses to do so; or
  - B. Exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation;
- (iii) The requirements of paragraph (b)(7)(i) of this clause are modified for a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons. The contractor shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. For example, the contractor shall not only offer return transportation to a witness at a time when the witness is still needed to testify. This paragraph does not apply when the exemptions at paragraph (b)(7)(ii) of this clause apply.
- 8. Providing or arrange housing that fails to meet the host country housing and safety standards; or
- 9. If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), 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.

#### **4. Disciplinary Actions**

If any employee, agent, subcontractor, vendor, or supplier is found to have engaged in prohibited activities, Unitec will promptly take action, including but not limited to the following, as applicable:

- Termination of employment, or removal of employee from the contract;
- Reduction in employee benefits;
- Require the subcontractor to remove subcontractor employee(s) from the contract;
- Decline to exercise available options under the subcontract;
- Termination of the subcontract for default or cause, in accordance with the termination clause of the subcontract, or require the subcontractor to terminate a lower-tier subcontract; or
- Termination of the business relationship with the subcontractor.

Furthermore, Unitec will report prohibited activities and any actions taken against an employee, agent, or subcontractor to the Contracting Officer and the agency Inspector General, as required by FAR 52.222-50.

#### **5. Compliance Plan**

Unitec has established the following plan to comply with FAR 52.222.-50(h), including the following six areas: Awareness Program; Reporting Methods; Recruitment and Wage Plan; Housing Plan; Monitoring Procedures for Agents and Subcontractors; and Posting.

#### **6. Awareness Program**

Unitec provides this Combating Trafficking in Persons – Policy and Compliance Plan via the company's website to inform all employees and new hires about prohibitions against trafficking-related activities described in FAR 52.222-50(b), the activities prohibited, consequences for violating company policy (see Section 2.B), and reporting methods. Additional information about Trafficking in Persons can be found at the web site for the Department of State's Office to Monitor and Combat Trafficking in Persons: [www.state.gov/j/tip](http://www.state.gov/j/tip)

Additional Awareness Program actions include:

- Employees deployed to OCONUS sites are required to read the Plan upon arrival in the country where the work will take place. Within three days, employees will deliver to their supervisor a signed electronic acknowledgement form stating that the employee has read the plan, commits to compliance with FAR 52.222-50 and Unitec's company policy, and understands that disciplinary actions will be taken against employees, agents, and subcontractors for violations.
- Unitec periodically will conduct specialized training on the Combating Trafficking in Persons regulations for personnel, including staff deployed OCONUS, executives, and procurement personnel. Unitec uses the Department of Defence's Combating Trafficking in Persons (CTIP) General Awareness Training at complete this General Awareness CTIP training must provide a copy of their completion certificate to their supervisor.

- A summary of Unitec's Combating Trafficking in Persons commitment is included in Unitec's Employee Handbook, which is available on the company's Personnel Portal.

## **7. Reporting Methods**

Any Unitec employee, agent, or subcontractor doing work on behalf of Unitec is required to report activity inconsistent with the policy prohibiting trafficking in persons set forth in FAR 52.222-50, including information or knowledge of actual or potential human trafficking violations, without fear of retaliation, to the employee's supervisor and/or Unitec Human Resources at [hr@uniteckwt.com](mailto:hr@uniteckwt.com) or +965 55967633. Any Unitec employee, agent, or subcontractor doing work on behalf of Unitec may also report violations by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org). Retaliation against an individual who reports a violation is strictly prohibited.

## **8. Recruitment and Wage Plan**

Unitec permits only the use of recruitment and staffing companies that provide proper training to employees, prohibits charging recruitment fees to the employee or potential employee, ensures compliance with local labor laws, and ensures wages meet applicable host country legal requirements or explains any variance. Unitec prohibits using misleading or fraudulent practices to recruit employees, such as failing to use language that is understandable to workers or failing to disclose basic information regarding the key terms and conditions of employment and, if applicable, potentially hazardous work conditions.

## **9. Housing Plan**

If Unitec intends to provide or arrange housing for employees, agents, or subcontractors, the company will develop a housing plan that ensures that the housing meets or exceeds host-country housing and safety standards. If Unitec's agents or subcontractors intend to provide or arrange housing for workers, the agents or subcontractors will develop a housing plan that meets or exceeds host-country housing and safety standards.

## **10. Monitoring Procedures for Agents and Subcontractors**

For U.S. government contracts specified under FAR 52.222-50, Unitec requires agents and subcontractors at any tier and at any dollar value to comply with all applicable laws and regulations to combat trafficking in persons. To monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in trafficking of persons (including activities in FAR 52.222-50(b), described above), Unitec requires all agents and subcontractors to annually submit and certify an internal policy and plan that meets FAR 52.222-50 requirements. This representation is designed to provide Unitec with sufficient information to assess the practices of its agents and subcontractors with respect to Combating Trafficking in Person compliance. If Unitec has engaged in prohibited activities, Unitec will implement disciplinary action in accordance with this Plan.

## **11. Posting**

Unitec posts this Plan at work locations (unless the work is to be performed in the field or not in a fixed location), and on the company website and employee personnel portal.

## **12. Certifications**

Prior to contract award and annually after receiving an award, Unitec will provide certifications to the contracting officer as required by the FARs.

Prior to award of a subcontract and annually during performance of the contract, Unitec shall obtain from each subcontractor a certification as required by the FARs.