



Combating Trafficking in Persons (CTIP) Compliance Plan

Trailer Bridge

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1.0 Executive Summary

Trailer Bridge is opposed to human trafficking and forced labor in any form. We are committed to best practices and requirements for Combatting Trafficking in Persons (CTIP). The US Government has a zero-tolerance policy regarding any Government employees and contractor personnel and their agents engaging in any severe form of trafficking in persons, defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery and sex trafficking.

Trailer Bridge personnel are required to comply with the provisions contained in the Federal Acquisition Regulation; Ending Trafficking in Persons (48 CFR Parts 1, 2, 9, 12, 22, 42, and 52) (the "FARs") and Defense Federal Acquisition Regulation Supplement: Further Implementation of Trafficking in Persons Policy (48 CFR Parts 203, 204, 212, 222, and 252) (the "DFARS") Executive Order 13627, "Strengthening Protections Against Trafficking in Persons in Federal Contracts," (the "Executive Order") as well as Trailer Bridge's Policy regarding Combating Trafficking in Persons (the "Vetegrity CTIP Policy") as well as policy and procedures outlined in Trailer Bridge's Employee Handbook.

To the extent these provisions differ in their requirements, the stricter requirements must be followed.

The following sets forth Trailer Bridge's compliance plan for Combating Trafficking in Persons.

Additional awareness information about trafficking in persons may be found at the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons website at <http://www.state.gov/j/tip>.

2.0 Awareness Program

Trailer Bridge notifies all employees including contractors and subcontractors of the policies prohibiting trafficking related activities and actions that will be taken if these policies are not followed. This includes providing a copy of the CTIP policy as well as examples of prohibited activity. Additional awareness measures may be taken as needed throughout the lifecycle of any contract to continuously promote awareness in combatting trafficking in persons.

Pursuant to the FARs, contractors, contractor employees and their agents are prohibited from:

- Engaging in severe forms (i.e., using force, fraud or coercion) of trafficking in persons during the period of performance of a contract.
- Procuring commercial sex acts during the period of performance of a contract .
- Using forced labor in the performance of a contract.

- 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.
- Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, 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, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with the local labor laws of the country in which the recruiting takes place.
- Charging employees recruitment fees.
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who was not a national of the country in which the work is taking place and who was brought into that country for the purposes of working on a U.S. Government contract, subcontract or portion(s) of contracts or subcontracts performed outside the United States.
- Failing to provide return transportation or pay for the costs of return transportation upon the end of employment, for an employee who is not a United States national and who was brought into the United States for the purpose of working 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 and subcontracts performed inside the United States.
- Providing or arranging housing that fails to meet the host country's housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing 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.
- Additional examples of trafficking in persons can be found on the Department of State's website for Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip/>.

Any violation of the FARs, the DFARS, the Executive Order and/or Trailer Bridge's CTIP Policy could result in disciplinary action which may include but is not limited to, an employee's removal from a contract, reduction in benefits, or termination of employment

3.0 Employee Reporting

On an annual basis Trailer Bridge requires that all employees review the CTIP compliance plan as well as acknowledge the process to report a violation without fear of retaliation. Any employee with knowledge of a CTIP activity or activity that is inconsistent with policy prohibiting trafficking in persons shall contact Trailer Bridge's ethic hotline at 833-734-0587 or <https://report.syntrio.com/trailerbridge>.

Additional reporting can be made to the Global Human Trafficking Hotline at 1-844-888-FREE or email at help@befree.org.

4.0 Subcontractors/Suppliers

Applicable FAR and DFAR clauses are flowed down to all Trailer Bridge's subcontractors. A copy of Trailer Bridge's CTIP policy will be provided to TB subcontractors.

5.0 Recruitment and Wage Plan

To the extent that Trailer Bridge uses recruitment companies, only recruitment companies with trained employees may be used. No recruitment fees may be charged to the employee and all wages must meet applicable host-country legal requirements. Any variances to this policy must be explained, documented and approved by Trailer Bridge senior HR staff prior to approval.

6.0 Housing Plan

Trailer Bridge does not currently provide housing for its employees, contractors or subcontractors however, in the extent that Trailer Bridge does provide this benefit in execution of a Government contract Trailer Bridge will ensure that it meets host-country housing and safety standards.

7.0 Procedures to Prevent Agents and Subcontractors from Engaging in Trafficking in Person and to Monitor, Detect and Terminate

7.1 Agents and Subcontractors

All agents and subcontractors, as a part of the Trailer Bridge onboarding process to allow payments, are screened against US Government and international denied and debarred party watchlists.

Not less than annually, Trailer Bridge will require each of its subcontractors to certify:

- 1) Its policies and practices prohibit engaging in the trafficking of persons, the use of forced labor, or the procuring of commercial sex acts in the country or countries in which it conducts business; and
- 2) If applicable, it has implemented a compliance plan to prevent any prohibited activities identified at FAR 52.222-50 (b) and to monitor, detect, and terminate any agent, subcontract or subcontractor employee engaging in prohibited activities; and
- 3) After having conducted due diligence, either

- 3.1 to the best of its knowledge and belief, neither it nor any of its agents, subcontractors, or their agents is engaged in any such activities; or
 - 3.2 if abuses relating to any of the prohibited activities identified in FAR 52.222-50(b) have been found, the subcontractor has taken the appropriate remedial and referral actions.
- 4) Has reviewed and understands the Trailer Bridge CTIP Policy as referenced herein.

As required by the FARs, Trailer Bridge shall flow down all applicable clauses to its subcontractors and agents.

Failure to comply with the requirements of the FARs is grounds for Trailer Bridge to take any and all appropriate actions, up to and including immediate termination of that subcontractor's or agent's contract with Trailer Bridge.

7.2 Suppliers

Trailer Bridge has made written information on combating human trafficking available to its suppliers. In addition, Trailer Bridge training for internal personnel includes information on recognizing the signs of human trafficking and the appropriate action to take if human trafficking is suspected and monitors suppliers whenever possible while on supplier premises.

8.0 Notification

Trailer Bridge shall immediately inform the Contracting Officer and the agency Inspector General upon receipt of credible information alleging a violation of FAR 52.222-50; and any actions taken against a Trailer Bridge employee, subcontractor, subcontractor employee, or their agent pursuant to FAR 52.222-50. As described above within this policy, employees may, in good faith, report, (without fear of retaliation and with employee protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9), any activity that violates the FARs, the DFARS, the Executive Order or Trailer Bridge's CTIP Policy to their management, Trailer Bridge ethics hotline at 833-734-0587 or the Global Human Trafficking Hotline or at help@befree.org. Anyone else, including subcontractors, agents, and contingent workers, may also use the hotlines or websites to report any issues relating to human trafficking.

9.0 Posting

Trailer Bridge's compliance plan shall be posted on the Trailer Bridge's internal intranet site, *The Bridge* and provided to all subcontractors via a weblink or attachment. A copy can also be provided upon request.

10.0 Certifications

Prior to contract award and annually after receiving an award, Trailer Bridge 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, Trailer Bridge shall obtain from each subcontractor a certification as required by the FARs