



# WSP USA ANTI-TRAFFICKING POLICY



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WSP USA adopts the US federal government's Combatting Trafficking in Persons policy found at FAR 52.222-50 and incorporates by reference the prohibitions and definitions in FAR 52.222-50. The policy applies to all employees directly working on US federal contracts.

## THIRD PARTY APPLICABILITY

Our Third Parties include our subconsultants, subcontractors, vendors, suppliers and their employees, business partners, agents and others working on their behalf and retained by WSP USA to perform work on federal projects. Federal law requires WSP USA to ensure that our Third Parties either agree to follow our WSP USA Anti-Trafficking Policy or have implemented their own policy satisfying the US federal government's requirements. Each Third Party may decide whether to adopt the WSP USA policy or its own.

## REQUIREMENTS

For the duration of an employee's or Third Party's work on a U.S. federal contract, this policy applies at all times, including during non- working hours. WSP USA, its employees directly working on a federal project, and our Third Parties, will:

- not engage in severe forms of trafficking in persons or use forced labor, and will not procure commercial sex acts, even in a jurisdiction where the procurement is legal;
- use open and fair recruitment practices; use recruiters who comply with local labor laws of the country in which the recruiting takes place; and not charge employees recruitment fees;
- provide employees, including potential employees, work documents in a language and format accessible to the employee; and provide a written employment contract, recruitment agreement, or other work document when required by law or contract;
- disclose basic information regarding the key terms and conditions of employment such as wages and fringe benefits, work location, living conditions, housing and associated costs, any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- when relocation is required for work, at least five days prior to relocation, provide employees with work documents that include at a minimum: detailed work description, wages, work locations, living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, prohibition on charging recruitment fees, 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;
- allow employees to access to their identity or immigration documents;
- provide return transportation upon the end of employment for employees who are (a) 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 U.S. federal government contract or subcontract or (b) not a US nationals and who were brought into the United States for the purpose of working on a U.S. federal 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.

## CONTRACT COMPLIANCE PLANS

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. Project Managers pursuing contracts that meet those criteria must seek guidance from Legal or Ethics & Compliance regarding preparation of a Compliance Plan and monitoring and reporting requirements.

## QUESTIONS OR CONCERNS

Employees may request assistance regarding this policy from the Ethics & Compliance team at [EthicsUS@wsp.com](mailto:EthicsUS@wsp.com). Anyone with reason to believe that WSP USA or its Third Parties may have violated this policy shall report the suspected violation to their supervisor, Human Resources, Legal, or Ethics & Compliance immediately. Reports may also be made, including anonymously, to the Business Conduct Hotline at 1-877-315-9932 or <https://wsp.ethicspoint.com/>. WSP USA provides protection against retaliation for anyone who makes a report in good faith. Sanctions for violation of this policy may include, but are not limited to, removal from the contract, reduction in benefits, or termination of employment.