



# ANTI-TRAFFICKING POLICY

WSP USA

DECEMBER 2022



## ANTI-TRAFFICKING POLICY

APPROVED BY THE US LEGAL REGULATORY COMPLIANCE ON December 12, 2022

REVISED IN December 2022

### SCOPE AND APPLICABILITY

This policy applies to all full-time and part-time employees of WSP USA and its subsidiaries.

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 working on or supporting 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 ("Applicable Policy").

### REQUIREMENTS

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

- not engage in [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 recruitment fees, which are
  - a. any cost necessary for employment or the job opportunity such as acquiring photographs and identity or immigration documents, medical examinations and immunizations, language interpretation or translations, transportation and food costs while traveling, and visas, including any associated fees;
  - b. interpreted broadly. If the potential employee only incurs a cost because of the job opportunity, it is considered a recruitment fee.
- 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; and
- 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 \$550,000 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.

**WHERE TO TURN FOR HELP**

Employees with a question about this policy should seek assistance. Sanctions for violation of this policy may include, but are not limited to, removal from the contract, reduction in benefits, or termination of employment. Employees also have a duty to report immediately any known or suspected violation of this policy or related laws or regulations to WSP USA. Employees may ask a question or report a concern to:

	A manager or supervisor
	A Human Resources Business Partner
	The Ethics & Compliance mailbox at <a href="mailto:EthicsUS@wsp.com">EthicsUS@wsp.com</a>
	A member of the WSP USA Ethics & Compliance team, listed on the WSP USA Intranet
	Global Human Trafficking Hotline at 1-844-888-FREE or <a href="mailto:help@befree.org">help@befree.org</a> .

**BUSINESS CONDUCT HOTLINE**

Employees can also use WSP’s confidential reporting service, provided by an independent service provider, to ask a question or report a concern confidentially or anonymously. More information on the Business Conduct Hotline is available on the internet site [www.wsp.com/ethics](http://www.wsp.com/ethics).

	1.877.315.9932
	<a href="https://wsp.ethicspoint.com/">https://wsp.ethicspoint.com/</a>



## PROTECTION AGAINST RETALIATION

WSP USA will seek to ensure that there is no retaliation against anyone for making a report in good faith. Any retaliation against someone who reports a concern in good faith or who cooperates in an investigation is a serious violation of our Code of Conduct. Employees must report acts or threats of retaliation immediately so appropriate action may be taken.

REV	DATE	DESCRIPTION	POLICY OWNER
0	7/2016	Initial Release	US Legal Regulatory Compliance
1	5/2017	Rebrand to WSP	US Legal Regulatory Compliance
2	11/2020	Template update	US Legal Regulatory Compliance
3	12/2022	Incorporate FAR updates	US Legal Regulatory Compliance