

## **1. Purpose**

Marshall of Cambridge Aerospace Limited (Marshall) is opposed to human trafficking in all forms and is supportive of the US Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons (hereafter referred to as FAR 52.222-50) to combat human trafficking and will ensure the risk of such practices is mitigated within the business.

FAR 52.222-50 prohibits US Government contractors and their agents from engaging in any severe form of trafficking in persons, defined to mean the recruitment, harbouring, transportation, provision or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, debt bondage or slavery and sex trafficking.

To comply with FAR 52.222-50 all applicable businesses engaged in a contract with the US Government must develop a Compliance Plan to ensure such mitigation of risks.

## **2. Applicability**

This Marshall Compliance Plan only applies within the business to contracts or subcontracts with the US Government for supplies (other than commercially available off-the-shelf items) or services, acquired or performed outside of the US with an estimated value that exceeds \$550,000.

The plan is to be adhered to by employees, suppliers, contractors, subcontractors, subcontractor employees and agents of Marshall performing work under a US federal government contract.

## **3. Plan constraints**

According to FAR 52.222-50, the Compliance Plan must be appropriately tailored to the size and complexity of the US Government contract, and to the nature and scope of the activities to be performed. This Marshall Compliance Plan outlines compliance with FAR 52.222-50.

Marshall reserves the right to review and further develop its Compliance Plan should the nature and complexity of its contracts with the US Government change.

#### 4. Compliance Plan

##### a. Awareness Training

The Human Trafficking Awareness Training, including Combatting Trafficking In Persons, is conducted during the on-boarding process and on an as needed basis thereafter to include contractors.

##### b. Risk assessment

An overall risk assessment is conducted as part of the Annual Risk Review process to assess the risk to the business in relation to FAR 52.222-50.

If it is identified a supplier falls within the requirements a risk assessment on the supplier may be conducted.

##### c. Recruitment / Wages / Housing

Marshall strictly prohibits misleading or fraudulent recruiting practices during local and international location recruitment.

We will only use recruitment companies who do not charge recruitment fees to the employee and will review upon engagement recruitment companies' terms of business to ensure compliance.

We will take measures to ensure employee wages meet applicable host-country legal requirements or will explain any variance. In the event that Marshall or its contractors, suppliers and agents intend to provide or arrange housing in connection with performing work under a contract that meets the requirements, housing will meet the host country housing and safety standards.

##### d. Procedure for contractors, suppliers and agents

The requirement to adhere to FAR 52.222-50 is mandatory for all contractors, suppliers and agents we engage with. This requirement is to be flowed down to all sub-tier contractors, suppliers and agents who engage in business with us. The substance of FAR 52.222-50 will be included in subcontracts and in contracts with agents.

However, requirements for a Compliance Plan apply only to any portion of the subcontract that meets the same prime contractor thresholds.

Contractors, suppliers and agents with a Compliance Plan in place must submit certification upon award of contract and on an annual basis thereafter. Marshall requires contractors, suppliers and agents to comply with all applicable local, state and national government laws and regulations of the local region they are conducting operations in.

Upon request, information will be made available to all contractors, suppliers and agents on combating human trafficking including copies of this plan and internal training materials.

If in the vicinity, Marshall employees have the right to observe contractor premises for any violations of FAR 52.222-50 and we reserve the right to take appropriate action and remedies/ referrals if a problem arises, and to terminate any contract should a report of violation be substantiated.

e. Process for Reporting violations

Should employees or contractors, suppliers and agents be unsure as to whether a specific action would be a violation of FAR 52.222-50, they should consult any member of the Marshall Leadership Team.

All employees or contractors, suppliers and agents are required to report information or knowledge of human trafficking internally to a member of the Leadership Team in the first instance.

If the employee does not feel comfortable reporting this information internally, they are able to contact the Global Human Trafficking Hotline at 1-844- 888-FREE or via email [help@befree.org](mailto:help@befree.org).

Retaliation against an individual who has reported a violation will not be tolerated.

f. Display of information

Marshall has placed this Compliance Plan on display and has made available the phone number and email address of the Global Human Trafficking Hotline:

(US) 1-844-888-FREE = 001-844-888-3733  
and  
[help@befree.org](mailto:help@befree.org)

should any violations need to be reported.

A copy of this plan will be placed on the Marshall website and will be provided to contractors, suppliers and agents if deemed necessary.

g. Certification

If applicable, after receiving an award and annually thereafter Marshall will certify it has a Compliance Plan in place, has conducted due diligence and has acted on any violations found.

Certification for contractors, suppliers and agents that meet the threshold will also be requested at this time.

h. All employees and contractors are encouraged to come forward to discuss the topic of Human Trafficking, or a perceived or actual violation, at any time.

For further information not covered in this plan please contact a member of the HR Department or Aerospace Leadership Team.