

Human Trafficking Compliance Plan – FAR 52.222-50

1.0 Purpose

The Shimmick Companies (“Shimmick”) are opposed to human trafficking and modern slavery in all forms and are supportive of the policy stated in U.S. Federal Acquisition Regulation Section 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 U.S. Government contractors and their agents from 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, debt bondage or slavery and sex trafficking. To comply with FAR 52.222-50 all applicable businesses engaged in contracts with the US Government must develop a Compliance Plan to ensure such mitigation of risks.

2.0 Applicability

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

This plan is to be adhered to by employees, suppliers, contractors, subcontractors, subcontractor employees, and agents of Shimmick, including subsidiaries and joint ventures controlled by Shimmick, performing work under a U.S. Federal Government contract.

3.0 Plan Constraints

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

Shimmick reserves the right to review and further develop its Human Trafficking Compliance Plan should the nature and complexity of its contracts with the U.S. Government change.

4.0 Compliance Plan

4.1 Awareness Training

Upon initial adoption, all Shimmick personnel will be notified of the Anti-Human Trafficking / Modern Slavery Policy via company-wide email containing a link to the policy with instructions to access and review the policy. Thereafter, Shimmick will send annual communications to all personnel directing them to review the policy and summarizing any policy updates. All new personnel are required to read and acknowledge the policy at the time of hire.

4.2 Recruitment / Wages / Housing

Shimmick strictly prohibits misleading or fraudulent recruiting practices during local and international location recruitment. Shimmick 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. Shimmick will take measures to ensure employees wages meet applicable host-country legal requirements or will explain any variance.

Human Trafficking Compliance Plan – FAR 52.222-50

In the event Shimmick or its contractors, suppliers and agents intend to provide or arrange housing in connection with performing work under a covered contract, housing will meet host-country housing and safety standards.

4.3 Contractors, Suppliers, Subcontractors and Agents

The requirement to adhere to FAR 52.222-50 is mandatory to all (sub)contractors, suppliers, and agents with whom Shimmick engages. This requirement is to be flowed down to all subcontractors, suppliers, and agents who engage in business with Shimmick. 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 a covered contract and on an annual basis thereafter.

Shimmick requires contractors, suppliers and agents to comply with all applicable local, state and national government laws and regulations of the local region in which they are conducting operations. 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.

Shimmick reserves 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.

4.4 Reporting Requirements

Any personnel, subcontractor/suppliers and subcontractor/supplier personnel who have reason to believe Shimmick or any of its third parties is conducting business with an entity engaging in any activity prohibited by this policy must promptly report the suspected misconduct to Management, Human Resources, Legal, or the Shimmick Ethics Hotline (ethics@shimmick.com; 833-723-2022).

If individuals do not feel comfortable reporting this information internally, they should contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email help@befree.org.

Human Resources will investigate all reports of prohibited trafficking-related activity or violations of this policy and take appropriate actions. The Project Manager is responsible for immediately notifying the contracting officer and the appropriate agency Inspector General.

Shimmick strictly prohibits retaliation against any person who reports prohibited trafficking-related activity, or who cooperates with any internal or government investigations of such reports. Retaliation against an individual who has reported a violation will not be tolerated. Personnel who engage in any form of retaliation against those who report prohibited trafficking-related activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment.

4.4 Investigations

If Shimmick receives credible information from an employee or any other source alleging prohibited trafficking-related activity, Human Resources will investigate and report its findings and determine what, if any, remedial action is appropriate. The Project Manager is responsible for immediately notifying the contracting officer and the appropriate agency Inspector General of the information received and any resulting remedial action taken.

Shimmick will cooperate fully with any U.S. Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not

Human Trafficking Compliance Plan – FAR 52.222-50

limited to, providing timely and complete responses to document requests, and providing reasonable access to Shimmick facilities and staff.

4.5 Display of Information / Posting

Shimmick will post this plan on The Source and on its external website, www.shimmick.com. Shimmick will also post this plan at all workplaces, except where the work is being performed in the field or not otherwise at a fixed location.

4.6 Certifications

Annually after receiving an award, Shimmick will certify to the contracting officer that:

1. It has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities and,
2. After having conducted due diligence, to the best of Shimmick's knowledge and believe, neither it nor any of its agents, subcontractors or their agents are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, Shimmick or it's subcontractor have taken the appropriate remedial and referral actions.