B3GLOBALCON
A Service-Disabled Veteran-Owned Small Business

B3GLOBALCON LLC
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Combating Trafficking in Persons Policy and Compliance Plan

B3GLOBALCON LLC (B3G) is opposed to human trafficking and forced labor in any form. We are committed to working to mitigate the risk of human trafficking and forced labor in all aspects of our business. This document formalized B3G's Combating Trafficking in Persons (CTIP) Policy and Compliance Plan.

Policy

The following sets forth B3G's CTIP Policy for all employees and subcontractor personnel, and their agents.

Definitions

"Coercion" means:
- Threats of serious harm to or physical restraint against any person;
- Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or
- The abuse or threatened abuse of the legal process.

"Commercial sex act" means any sex act on account of which anything of value is given to or received by any person.

"Debt bondage" means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

"Forced labor" means knowingly providing or obtaining the labor or services of a person:
- By threats of serious harm to, or physical restraint against, that person or another person;
- By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
- By means of the abuse or threatened abuse of law or the legal process.

"Involuntary servitude" includes a condition of servitude induced by means of:
- Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or
- The abuse or threatened abuse of the legal process.

"Peonage" means:
- The use of laborers bound in servitude because of debt, or
- A system of convict labor by which convicts are leased to contractors.

"Severe forms of trafficking in persons" means:

- Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- 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.

"Sex trafficking" means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

B3G Policy

B3G has adopted a zero-tolerance policy regarding trafficking in persons. All B3G employees and subcontractor personnel, and their agents shall not:

- Engage in severe forms of trafficking in persons defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, using force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery, and sex trafficking during the performance of applicable contracts;
- Procure commercial sex acts during the performance of applicable contracts; or
- Use forced labor in the performance of applicable contracts.

B3G employees and subcontractor personnel, and their agents are required to comply with the provisions contained in:

- Department of Defense Instruction Number 2200.01,
  SUBJECT: Combating Trafficking in Persons (CTIP), the DoDI 2200.01 at
  http://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/220001p.pdf;
- the Federal Acquisition Regulation; Ending Trafficking in Persons (48 CFR Parts 1, 2, 9, 12, 22, 42, and 52) (the "FARs");
- the Federal Acquisition Regulation Supplement: Further Implementation of Trafficking in Persons Policy (48 CFR Parts 203, 204, 212, 222, and 252) (the "DFARS"); and
- Executive Order 13627, "Strengthening Protections Against Trafficking in Persons in Federal Contracts," (the "Executive Order").

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

Compliance Plan

The following sets forth B3G's compliance plan for all employees and subcontractor personnel, and their agents; and for all contracts based upon on the size and complexity of the contract and the nature and scope of the activities, as required by FAR 52.222-50(h).

Awareness Program

Pursuant to the FARs, B3G, its employees and subcontractor personnel, 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 housing and safety standards; and
- 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.

Any violation of the FARs, the DFARS, the Executive Order and/or B3G's 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. For subcontractors and subcontractor employees, failure to comply with the requirements of the FARs, the DFARS and the Executive Order is grounds for B3G to take any and all appropriate actions, up to and including immediate termination of that subcontractor's contract with B3G.

Employees

On an annual basis, B3G requires all employees to complete CTIP Compliance Training and certify that they have read, understand and agree to comply with the policies, procedures and principles of the B3G CTIP policy and report any violations of which they are aware.

B3G conducts in-person, all-hands CTIP Compliance Training annually and as needed throughout the year. Such compliance training is targeted and customized for various business units and appropriate to the nature and scope of the activities to be performed.

A communication was sent to all B3G employees which included training on combating human trafficking and this compliance plan.

Recruitment and Wage Plan

To the extent that B3G 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 or explain any variance.

Housing Plan

The US Government does not offer in-country housing arrangements for our European operations. Currently our personnel are Bulgarian, Polish, and Romanian citizens; and they make their own living arrangements. B3G will provide lodging for its employees when such lodging is required by a specific contract.

Monitoring Procedures

From time to time B3G's Executive Director, General Manager, Project Managers, and other personnel may travel to project sites. During such visits, they will seek to be vigilant of any indications of possible violations of CTIP or other policies. At other times, B3G relies on the reporting of other project staff (either from within B3G or from other project partners) of any alleged or actual violations of CTIP or other policies. B3G's CTIP policy clearly establishes the consequences for violations of its CTIP policy either by employees and subcontractor personnel, and their agents.

Investigations

If B3G receives any credible information regarding a violation or suspected violation of B3G and United States Government prohibitions on the trafficking of persons, B3G's General Manager will immediately notify the Contracting Officer. B3G will fully cooperate with any Federal agencies responsible for audits, investigations, or corrective actions relating to trafficking in persons. B3G understands that the cognizant Contracting Officer may direct B3G to take specific steps to abate any alleged violation or to enforce the requirements of this compliance plan.

Posting

B3G will post this plan on its external website, www.b3globalcon.com, and at all fixed workplaces throughout the world.

Compliance History

B3G is not aware of any past or current violations of its CTIP Policy. B3G is not aware of any internal or external reports of any alleged or actual incidents of trafficking in persons by our staff.

Due Diligence and Safeguards

B3G requires that all staff review the CTIP Policy upon affiliation with B3G and on an annual basis. The General Manager and the Project Managers interact regularly with project staff to ensure open channels of communication and that the CTIP Policy is not violated.

Resources

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 Office to Monitor and Combat Trafficking in Persons.

Questions

Questions regarding B3G 's CTIP Policy and Compliance Plan may be directed to:

B3G's President, Executive Director, and CTIP Compliance Officer, Kevin Beam, at kevin.beam@b3globalcon.com.

Reporting Process

Employees should consult the above personnel if they are uncertain whether a specific action would be in violation of DoDI 2200.01, the FARs, the DFARS, the Executive Order, or B3G's CTIP policy. Employees may report, in good faith, and have a responsibility to, without fear of retaliation and subject to protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, for reprisal for whistleblowing on trafficking in persons violations, any activity that violates DoDI 2200.01, the FARs, the DFARS, the Executive Order, or B3G's CTIP policy to their management. In addition, employees may contact the National Human Trafficking Hotline at 1-888-373-7888, Text 233733, or chat via humantraffickinghotline.org/chat; or the Department of War hotline at http://www.dodig.mil/hotline or toll free at 800-424-9098.

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Annex 1, B3GLOBALCON LLC

This annex lists the current B3GLOBALCON LLC contracts to which the CTIP Policy and Compliance Plan are applicable.

Contract Number:	N00178-19-D-7220
Customer:	Navy
Period of Performance:	01/02/2019 – 01/02/2029

Subcontract Number	AGILE JV Subcontract 26D0001-04
Contract Number:	N68520-26-D-0001
Customer:	Commander, Fleet Readiness Centers (COMFRC)
Period of Performance:	01/05/2026 – 01/04/2031

Additionally, all B3GLOBALCON LLC employees and subcontractor personnel, and their agents are subject to, and will abide by B3G's CTIP Policy and Compliance Plan.