



77 İnsaat F2AP-KG0001

Combating Trafficking in Persons (CTIPs) Compliance Plan

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1.0 PURPOSE

This CTIPs Compliance Plan (CCP) establishes the responsibilities and processes to ensure 77 Insaat complies with U.S. Government requirements for combating trafficking in persons. Compliance with this plan is mandatory as part of 77 Insaat's due diligence in supporting proposal representations and annual contract certifications to the Prime Contractor to ensure 77 Insaat's compliance with CTIPS requirements.

2.0 POLICY

77 Insaat has adopted the below policies in regard to combating trafficking in persons. 77 Insaat will take appropriate actions against any employee or agent who is found to be in violation of this policy. Such actions may include removal from the contract, reduction in benefits, or termination of employment.

2.1 U.S. GOVERNMENT POLICY (FAR 52.222-50(B))

Contractors, contractor employees, and their agents shall not:

- Engage in severe forms of trafficking in persons during the period of performance of the contract
- Procure commercial sex acts during the period of performance of the contract
- Use forced labor in the performance of the contract
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment
- Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place
- Charge employees recruitment fees
- Fail to provide return transportation or requiring payment for the cost of return transportation for certain employees
- Provide or arrange housing that fails to meet the host country housing and safety standards
- If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands

2.2 U.S. DEPARTMENT OF DEFENSE (DOD) POLICY (DFARS 252.222-7006(B))

It is the policy of the Department of Defense (DoD) that trafficking in persons will not be facilitated in any way by the activities of DoD contractors or contractor personnel. DoD will not tolerate severe forms of trafficking in persons or use of forced labor by DoD contractors, DoD subcontractors, or DoD contractor or subcontractor personnel during the period of contract performance. Furthermore, DoD will not tolerate the procurement of commercial sex acts by DoD contractors, DoD subcontractors, or DoD contractor or subcontractor personnel, during the period of performance of service or construction contracts. The United States has adopted a zero-tolerance policy regarding contractor personnel who engage in or support trafficking in persons.

2.3 77 INSAAT POLICY

77 Insaat opposes human trafficking and forced labor in any form. We use internal and external resources to mitigate the risk of human trafficking and forced labor in our business. The US Government has a zero-tolerance policy regarding any Government employees and contractor personnel and their agents 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, peonage, debt bondage or slavery and sex trafficking. 77 Insaat adopts this policy and will take appropriate action against any employee, agent or contractor who engages in behavior that promotes human trafficking or forced labor.

3.0 EMPLOYMENT POLICIES, PRACTICES & PROCEDURES

77 Insaat has implemented the following employment policies, practices and procedures for all individuals to be employed under this project:

3.1 RECRUITMENT AND WAGE PLAN

To the extent that 77 Insaat 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. On this project, 77 Insaat will use its own employees and leased staff from Dunia Technique, a Turkish employment company who has worked with 77 Insaat since 2009. Dunia Technique is a trusted manpower supplier that works within the framework of US and Turkish anti-trafficking laws.

77 Insaat, its employees, and its agents will not charge a prospective employee or a current employee a recruitment fee.

77 Insaat, its employees, and its agents will comply with local labor laws of the country in which the recruiting takes place.

77 Insaat, its employees, and its agents will not use misleading or fraudulent practices during the recruitment of employees or offering of employment. 77 Insaat will accurately disclose the following information, in a format and language that is understood by the prospective employee, as part of the recruitment process:

- Key terms and conditions of employment
- Wages and fringe benefits
- Location of work
- Living conditions
- Housing and associated costs (if employer or agent provided or arranged)
- Any significant cost to be charged to the employee
- Hazardous nature of the work (if applicable)

77 Insaat pays all employees and leased staff on a monthly basis at the end of the month.

3.2 EMPLOYMENT CONTRACTS

77 Insaat will provide each employee with a written copy of the employment contract that defines the terms of his or her employment/compensation. Employment contracts will be provided both in

English and a native language understood by the employee. If the employee must relocate to perform the work, the employment contract will be provided to the employee at least five days prior to the employee relocating. Each employment contract will include, but not be limited to, the following:

- Details about work description
- Wages
- Prohibition on charging recruitment fees
- Work location(s)
- Living accommodations and associated costs
- Time off
- Roundtrip transportation arrangements
- Grievance process
- Content of applicable laws and regulations that prohibit trafficking in persons

For sample employment contract, see Exhibit A.

3.3 ENTRY/EXIT DOCUMENTS

77 Insaat will ensure that deploying personnel have all necessary passports, visas, and other documents required to enter and exit a designated operational area prior to deployment. 77 Insaat will comply with Host Nation laws regarding transit/exit/entry procedures and the requirements for visas and work permits.

3.4 EMPLOYEE DOCUMENT HANDLING (PASSPORTS)

77 Insaat, its employees, and/or its agents will not knowingly destroy, conceal, remove, confiscate, or possess any passport, immigration, or government identification document, regardless of issuing authority, of another person, to prevent or restrict, without lawful authority, the person's liberty to move or travel, in order to maintain the labor or services of that person.

77 Insaat, its employees, and/or its agents will not hold employee passports and other identification documents discussed above except for administrative processing purposes. At no time may 77 Insaat, its employees, and /or its agents hold onto a passport for more than five business days without a sign-off by the HR Director.

3.5 HOUSING PLAN

GOVERNMENT PROVIDED, ON-BASE HOUSING

All life support areas are provided by the United States Air Force and the Royal Air Force. 77 Insaat will engage in periodic checks of life support areas to ensure sanitation, health and safety of our employees and leased staff.

3.6 RETURN TRANSPORTATION

77 Insaat will provide return transportation or pay for the cost of return transportation to the employee's point of origin upon the end of employment for any employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government subcontract.

4.0 EMPLOYEE NOTIFICATION AND AWARENESS PROGRAM

77 Insaat requires every employee and leased staff to sign its Code of Ethics Conduct which incorporates the US DOD CTIP Policy. In addition, every employee and leased staff is informed of this policy, 77 Insaat's grievance policy, and their employee rights within their employment contracts.

5.0 POSTINGS

77 Insaat posts this CTIP Compliance Plan, its Code of Ethics Conduct, a link to its Ethics Hotline, and information regarding the Global Human Trafficking Hotline on its webpage. All employees will receive a copy of the DOD Fraud Hotline Poster, the DOD CTIP Hotline Poster, a whistleblower protection poster, their employee rights under FAR 52.222-50(b), and information regarding the Global Human Trafficking Hotline as part of their initial employment packet. In addition, these all of these posters and pieces of information will be posted in designated operational areas. Our Ethics Hotline poster is attached as Appendix B.

6.0 EMPLOYEE REPORTING

77 Insaat will ensure that 77 Insaat employees and agents are aware of their affirmative obligations to report any known or suspected activities inconsistent with the above policies. 77 Insaat will ensure that employees and agents are aware that they may report any known or suspected violations without fear of retaliation.

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 the FARs, the DFARS, the Executive Order or the 77 Insaat Policy to their management, the 77 Insaat Chief Compliance Officer or at our ethics hotline at ethicssuite.com/77construction. In addition, employees may contact the Global Human Trafficking Hotline at +1-844-888-FREE or via its email address at help@befree.org or the Department of Defense at www.dodig.mil/hotline/ or toll free at +1-800-424-9098.

77 Insaat will notify all employees and agents that 77 Insaat does not tolerate any form of direct or indirect retaliation that arises from reporting suspected illegal or unethical conduct in good faith. Retaliating against someone who makes a report in good faith will result in prompt and strong disciplinary action, up to, and including, termination.

7.0 DISCLOSURE & COOPERATION

77 Insaat, as a subcontractor, has an affirmative duty to advise the Prime Contractor if it learns of employees or agents violating the human trafficking and inhumane living conditions provisions contained herein.

- 77 Insaat will notify the Prime Contractor immediately of any credible information it receives from any source (including host country law enforcement) that alleges a 77 Insaat employee, subcontractor, subcontractor employee, or their agent has engaged in conduct that violates the CTIPs policies described above.
- Notification will provide information about the nature and extent of the offense, the individuals responsible for the conduct, and include disciplinary actions taken, if any. The Prime Contractor will provide notifications to the Contracting Officer and the agency Inspector General as needed.

- If the allegation may be associated with more than one contract, the 77 Insaat will still inform Fluor.
- 77 Insaat will provide timely and complete responses to Prime Contractor and Government auditors' and investigators' requests for documents.
- 77 Insaat will cooperate fully in providing reasonable access to its facilities and staff (both inside and outside the U.S.) to allow contracting agencies and other responsible Prime Contractor and Federal agencies to conduct audits, investigations, or other actions to ascertain compliance with the Trafficking Victims Protection Act of 2000 (22 U.S.C. chapter 78), E.O. 13627, or any other applicable law or regulation establishing restrictions on trafficking in persons, the procurement of commercial sex acts, or the use of forced labor.
- 77 Insaat will protect all employees suspected of being victims of, or witnesses to, prohibited activities prior to returning to the country from which the employee was recruited, and shall not prevent or hinder the ability of these employees from cooperating fully with Government authorities.

8.0 CERTIFICATION

Prior to award and annually thereafter, 77 Insaat will submit a certification to the Prime Contractor that states the following:

- 77 Insaat has implemented a compliance plan designed to prevent any prohibited activities identified in paragraph (b) of FAR 52.222–50, Combating Trafficking in Persons, and to monitor, detect, and terminate the contract with any lower-tier subcontractor or agent engaging in prohibited activities identified at paragraph (b) of FAR 52.222–50, Combating Trafficking in Persons and
- After having conducted due diligence either
 - To the best of 77 Insaat’s knowledge and belief, neither it nor any of its proposed agents, subcontractors, or their agents is engaged in any such activities; or
 - If abuses relating to any of the prohibited activities identified in 52.222–50(b) have been found, 77 Insaat has taken the appropriate remedial and referral actions.

9.0 LOWER-TIER SUBCONTRACTORS AND AGENTS

9.1 FLOWDOWN CLAUSES

The substance of the following mandatory flowdown clauses will be incorporated in all lower-tier subcontracts and agent agreements:

- FAR 52.222-50, Combating Trafficking in Persons, Alternate 1
- DFARS 252.203-7004, Display of Hotline Posters
- DFARS 252.222-7006, Combating Trafficking in Persons
- DFARS 252.225-7040, Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States
- DFARS 252.225-7980 - Contractor Personnel Performing in the United States Africa Command Area of Responsibility, (Deviation 2016-O0008) C-JTSCC 5152.222.5900, Prohibition Against Human Trafficking, Inhuman Living Conditions, and Withholding of Employee Passports

9.2 SUBCONTRACTS

Pre-Award Activities: Prior to award of any subcontract or agent agreement, 77 Insaat will:

- Include all required CTIPs clauses in any Request for Proposal (RFP)
- Determine the requirement for a CTIPs Compliance Plan and CTIPs Compliance Certification
- Obtain CTIPs Compliance Plan and CTIPs Compliance Certification from the apparent successful offeror
- Review the apparent successful offeror's CTIPs Compliance Plan and coordinate the determination that it meets minimum requirements stated in section 9.3 below, and is appropriate to the size, complexity, nature, and scope of the services to be performed.

Post-Award Activities: Following subcontract award, 77 Insaat will monitor and detect (and terminate as appropriate) any lower-tier subcontract or subcontractor agent that has engaged in prohibited activities, at any tier, and any dollar amount. At a minimum, 77 Insaat will:

- Include in all lower-tier subcontracts all required CTIPs clauses and require the lower-tier subcontractor implement equivalent flow downs of the required CTIPs clauses in all lower-tier subcontracts.
- Require that lower-tier subcontractors provide to their employees compliant CTIPs training as part of the pre-deployment process
- Obtain quarterly subcontractor certification to confirm lower-tier subcontractors are complying with the CTIPs policy, as applicable
- Conduct an annual review of all applicable lower-tier subcontractors' CTIPs Compliance Plans to determine that they continue to meet minimum requirements stated in section 9.3 below, and are appropriate to the size, complexity, nature, and scope of the services to be performed

Require all applicable lower-tier subcontractors submit annual CTIPs Compliance Certification, as described in in section 9.3 below.

9.3 LOWER TIER SUBCONTRACTOR CTIPS COMPLIANCE PLANS

77 Insaat will require submission of a CTIPs Compliance Plan and Certification of CTIPs Compliance prior to the award of any lower-tier subcontract and annually thereafter for any lower-tier subcontract meeting one of the following criteria:

- 1) Is for supplies, other than commercially available off-the-shelf items, acquired outside the United States; and has an estimated value that exceeds \$500,000.
- 2) Is for services to be performed outside the United States; and has an estimated value that exceeds \$500,000

9.3.1 CTIPS COMPLIANCE PLAN MINIMUM REQUIREMENTS

A lower-tier subcontractor that is required to maintain a compliance plan shall include in the compliance plan, at a minimum:

- 3) An awareness program to inform contractor employees about the Government's policy prohibiting trafficking-related activities, the activities prohibited, and the actions that will be taken against the employee for violations
- 4) A process for employees to report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons (including the hotline phone number of the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org); if

the subcontractor does not have an ethics hotline, it will use 77 Insaat's hotline at ethics-suite.com/77construction

- 5) A recruitment and wage plan that only permits the use of recruitment companies with trained employees, prohibits charging recruitment fees to the employee, and ensures that wages meet applicable host-country legal requirements or explains any variance
- 6) A housing plan, if applicable, that ensures that the housing meets host-country housing and safety standards
- 7) Procedures designed to prevent agents and subcontractors at any tier and at any dollar value from engaging in trafficking in persons and to monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in such activities

Additionally, the lower-tier subcontractor shall post the relevant contents of the compliance plan in the workplace and on the subcontractor's website (if one is maintained). If posting at the workplace or on a website is impracticable, the lower-tier subcontractor shall provide the relevant contents of the compliance plan to each worker in writing.

9.3.2 CERTIFICATION OF CTIPS COMPLIANCE

Prior to award and annually thereafter, any lower-tier subcontractor that is required to maintain a compliance plan shall submit a certification that states the following:

- The offeror/subcontractor has implemented a compliance plan designed to prevent any prohibited activities identified in paragraph (b) of FAR 52.222–50, Combating Trafficking in Persons, and to monitor, detect, and terminate the contract with any lower-tier subcontractor or agent engaging in prohibited activities identified at paragraph (b) of FAR 52.222–50, Combating Trafficking in Persons and
- After having conducted due diligence either
- To the best of the offeror/subcontractor's knowledge and belief, neither it nor any of its proposed agents, subcontractors, or their agents is engaged in any such activities; or
- If abuses relating to any of the prohibited activities identified in 52.222–50(b) have been found, the offeror/subcontractor or proposed subcontractor has taken the appropriate remedial and referral actions.

10.0 REFERENCES

- FAR 52.222-50 Combating Trafficking in Persons (Mar 2015)
- DFARS 252.222-7006 Combating Trafficking in Persons (Oct 2006)
- DFARS 252.203-7004 Display of Hotline Posters (Jan 2015)
- DFARS 252.225-7980 - Contractor Personnel Performing in the United States Africa Command Area of Responsibility, (Deviation 2016-O0008)
- DFARS 252.225-7040 Contractor Personnel Supporting U.S. Armed Forces Deployed Outside of the U.S. (Jun 2015)
- C-JTSCC 5152.222-5900 Prohibition Against Human Trafficking, Inhumane Living Conditions, and Withholding of Employee Passports (March 2014)