

Date: December 18th, 2017
To: All Sub Contractors
From: Joshua M. Pepperd, President
RE: Combating Trafficking in Person-FAR 52.222-50

The United State Government has adopted a zero tolerance policy regarding trafficking in persons that addresses the victimization of countless men, women, and children in the United State and abroad. Davis Constructors & Engineers Inc. (Davis) is obligated to notify all Sub-Contractors of the government's policy and any disciplinary action that will be taken against them should a violation occur. Due to the serious nature of this regulation, penalties for violation of this policy can be severe, including termination of Davis Federal contract(s). Sub-Contractors who violate this policy could not only put their jobs in jeopardy, but also the jobs of their fellow Sub-Contractors, and consequentially the reputation of Davis itself.

Davis has a zero tolerance policy regarding trafficking in persons, whereby Davis and all Sub-Contractors, shall not:

- Engage in severe Forms of Trafficking in Personsⁱ during the period of performance of a contract to which FAR 52.222-50 applies;
- Procure commercial sex acts during the period of performance of a contract to which FAR 52.222-50 applies; or
- Use Forced Laborⁱⁱ in the performance of a contract to which FAR 52.222-50 applies

The Federal government does not differentiate between violations of this policy while Sub-Contractor are “on the clock” and after work, therefore our policy cannot either. Also, if Davis is performing ANY contract to which this FAR applies, the policy is in full force for Davis and all of its Sub-Contractors.

Any Sub-Contractors who violates this policy will be subject to appropriate disciplinary action, up to and including termination of contracts.

Definition, as used in FAR 52.222-50

ⁱSevere forms of trafficking in persons means 1) 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 had not attained 18 years of age; 2) 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.

ⁱⁱForced Labor means knowingly providing or obtaining the labor of services of a person 1) by threats of serious harm to, or physical restraint against, that person or another person; 2) 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 3) by means of the abuse or threatened abuse of law or the legal process.