



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. Mass Excavation, Inc. (Mass X) 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 Mass X 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 Mass X itself.

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

- Engage in Severe Forms of Trafficking in Persons¹ 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 Labor² 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 Mass X is performing ANY contract to which this FAR applies, the policy is in full force for Mass X 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

¹Severe 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.

² Forced 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.