

## **Human Trafficking Compliance Plan**

### **U.S. Regulation FAR 52.222-50**

#### **Purpose**

Bigorre Aerospace Corporation (BAC) is opposed to human trafficking in all forms and is supportive of the U.S. Federal Acquisition Regulation 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 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 contract with the U.S. Government must develop a Compliance Plan to ensure such mitigation of risks.

#### **Applicability**

BAC's Human Trafficking Compliance Plan applies to all acquisition activities in support of BAC contracts or subcontracts with the U.S. Government for supplies or services with no exception.

The plan is to be adhered to by employees, suppliers, contractors, subcontractors, subcontractor employees and agents of BAC, including subsidiaries and joint ventures controlled by BAC, performing work under a U.S. federal government contract.

#### **Appropriateness**

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

#### **Compliance Plan**

**Training and Awareness:** Human Trafficking Awareness Training is conducted annually for all employees and on an as needed basis to reinforce the U.S. Government's and BAC's zero tolerance policy. Training materials are available to contractors and third parties upon request.

**Supplier Code of Conduct:** BAC maintains a Supplier Code of Conduct. This Supplier Code of Conduct expresses the expectations we hold for Suppliers, including adherence to regulations prohibiting human trafficking and compliance with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and appropriately address any adverse human rights impacts of their operations.



6295 42<sup>nd</sup> Street North  
Pinellas Park FL 33781  
USA

P: 727-525-8115  
contact@bigorre-aerospace.com  
bigorre-aerospace.com  
FAA: UT4R582M  
EASA: 145.5187  
AS9100D

**Recruitment, Wages and Housing:** BAC prohibits misleading or fraudulent recruiting practices during all recruitment activities. BAC 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.

BAC will take measures to ensure employee wages meet applicable country legal requirements or will explain any variance. In the event that BAC or its contractors, suppliers and agents intend to provide or arrange housing in connection with performing work under a contract that meets the requirements, housing will meet host country housing and safety standards.

**Contractors, Suppliers and Agents:** The requirement to adhere to FAR 52.222-50 is mandatory to all contractors, suppliers and agents BAC engages with. This requirement is to be flowed down to all sub-tier contractors, suppliers and agents who engage in business indirectly with BAC. 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.

BAC requires contractors, suppliers and agents to comply with all applicable local, state and national government laws and regulations of the local region they are conducting operations in. 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. BAC reserves the right to observe contractor premises for any violations of FAR 52.222-50 and to take appropriate action and remedies if a problem arises, and to terminate any contract should a report of violation be substantiated.

**Reporting Violations:** Should employees or contractors, suppliers and agents be unsure as to whether a specific action would be a violation of FAR 52.222-50, they should consult BAC's legal department. All employees or contractors, suppliers and agents are required to report information or knowledge of human trafficking internally. If the employee does 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](mailto:help@befree.org). Retaliation against an individual who has reported a violation will not be tolerated.

**Posting:** BAC displays FAR 52.222-50 Combating Trafficking in Persons posters including making available the phone number of the Global Human Trafficking Hotline (U.S.) 1-844-888-FREE and email address of [help@humantraffickinghotline.org](mailto:help@humantraffickinghotline.org).

**Certifications:** Annually after receiving an award, BAC will certify 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 BAC's knowledge and belief, 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, BAC or its subcontractor has taken the appropriate remedial and referral actions.



6295 42<sup>nd</sup> Street North  
Pinellas Park FL 33781  
USA  
P: 727-525-8115  
[contact@bigorreaerospace.com](mailto:contact@bigorreaerospace.com)  
[bigorreaerospace.com](http://bigorreaerospace.com)  
FAA: UT4R582M  
EASA: 145.5187  
AS9100D

Poster:



The poster features a vertical film strip on the left side with five frames showing diverse individuals. The text is arranged in a clean, professional layout with blue and red accents. The top left corner includes the Department of Defense seal and the title 'COMBATING TRAFFICKING IN PERSONS U.S. DEPARTMENT OF DEFENSE'. The main body contains three key sections: 'STOP Human Trafficking', 'Recognize SIGNS', and 'REPORT IT', each with specific definitions and indicators. The bottom right corner features a globe graphic with the text 'COMBATING TRAFFICKING IN PERSONS AROUND THE GLOBE' and the website 'CTIP.defense.gov/'.

 **COMBATING TRAFFICKING IN PERSONS**  
U.S. DEPARTMENT OF DEFENSE

**STOP Human Trafficking**  
Force, fraud, or coercion to compel a person to provide labor, services, or commercial sex.

Victims come from all backgrounds and can be women, men, and children.

Any minor (under 18 years of age) involved in commercial sex is a victim of human trafficking.

**Recognize SIGNS**

Physical/Environmental Indicators include signs of abuse, no identification, confined to worksite.

Psychological/Behavioral Indicators include submissive, anxious, lack of free will.

**REPORT IT**

Chain of Command  
Local Law Enforcement  
DoD Inspector General Hotline  
1-800-424-9098 or visit <http://www.dodig.mil/hotline>  
National Human Trafficking Hotline  
1-888-373-7888.

 **COMBATING TRAFFICKING IN PERSONS AROUND THE GLOBE**

For more information go to:  
**CTIP.defense.gov/**

  
**ASR**  
American Systems  
REGISTRAR

6295 42<sup>nd</sup> Street North  
Pinellas Park FL 33781  
USA

P: 727-525-8115  
[contact@bigorreaerospace.com](mailto:contact@bigorreaerospace.com)  
[bigorreaerospace.com](http://bigorreaerospace.com)  
FAA: UT4R582M  
EASA: 145.5187  
AS9100D