

Compliance Plan for Combating Trafficking in Persons

APPROACH

Rauma Marine Constructions Oy has a full commitment to fulfil all legal obligations related to prohibiting trafficking in persons. This means that

- We have a zero-tolerance policy toward trafficking in persons and related prohibited activities. Policy violations will result in disciplinary action, termination of contracts, and reporting to authorities
- We comply with all applicable national laws and regulations, and are aware and implement, among the other, of the following regulations in our operations:
 - Finnish Criminal Law, Section 25 (human trafficking)
 - Act on the Contractor's Obligations and Liability when Work is Contracted Out (1233/2006, Tilaajavastuulaki)

Further, when working in project(s) for U.S. Government,

- We are committed to comply with the Federal Acquisition Regulation, FAR 52.222-050, the U.S. Government policy for combating trafficking in persons
- We will handle this instruction as an integral part of our management system
- This plan applies to all employees, and also our agents, subcontractors and suppliers (hereafter "suppliers"). Compliance with FAR 52.222-050 is included in all relevant supplier agreements (suppliers outside from USA and having annual spend over 700 000 USD). Suppliers shall implement a compliance plan appropriate to the size and complexity of the contract and certify compliance annually.

DEPLOYMENT

Awareness

- Rauma Marine Construction Oy plans and implements mandatory onboarding training for employees and relevant suppliers about the purpose of this instruction, added with the U.S. Government's trafficking policy, prohibited activities, and consequences of violations. Our training program includes annual refresher training with examples of prohibited conduct.

Posting

- The contents of this compliance plan are visible internally via multiple information channels and on the company website. Written materials will be provided in local languages.

Compliance certification

- We are committed to annual certification to the U.S. Contracting Officer that Rauma Marine Construction Oy has implemented this compliance plan, and after due diligence
 - knows no prohibited activities are ongoing or
 - has addressed any found abuses with remedial/referral actions.

Records

- Rauma Marine Constructions Oy will maintain training logs, audit reports, and certifications for at least three (3) years. We are ready to cooperate fully with U.S. Government audits and investigations.

OUTCOME

Compliance plan further increases the overall perception that Rauma Marine Constructions Oy is the trusted and preferred employee and reliable long-term business partner for our customers, suppliers and other key stakeholders.

ADDITIONAL INFORMATION

The meaning of U.S. Government's trafficking policy and prohibited activities

We will ensure that neither we nor our relevant suppliers shall not during contract performance:

1. Engage in severe forms of trafficking in persons.
2. Procure commercial sex acts.
3. Use forced labor.
4. Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or work permits, regardless of issuing authority.
5. Use misleading or fraudulent recruitment practices.
6. Charge employees recruitment fees.
7. Fail to provide return transportation or pay for cost of return transportation for employees when required.
8. Provide or arrange housing that fails to meet host-country housing and safety standards.
9. If required by law or contract — fail to provide an employment contract, recruitment agreement, or other required work document in writing, in a language the employee understands; and if relocation is required, provide that document at least five days before relocation. The document must cover, at a minimum: work description, wages, prohibition on recruitment fees, work location(s), living accommodations and costs, time off, round-trip transportation arrangements, grievance process, and the relevant laws/regulations that prohibit trafficking.

Consequences of violations

The actions that will be taken against employees or suppliers for violations may include

- removal from contract
- reduction in benefits, or
- termination of employment

Confidential reporting channels

We have both internal and external reporting channels to report violations towards compliance with trafficking in persons. Employees may report without fear of retaliation.

1. On the company website: <https://rmcfinland.fi/compliance/>.
2. External reporting:
 - a. Global Human Trafficking Hotline: Phone: +1-844-888-FREE,
 - b. Email: help@befree.org.