



# Combating Trafficking in Persons Compliance Plan

## Purpose

The purpose of this Plan is to notify Hornbeck Offshore personnel of the United States Government's policy prohibiting trafficking in persons-related activities, the activities prohibited, and the actions that will be taken against employees for violations.

## Applicability

Employees, agents, and others authorized to act on behalf of Hornbeck Offshore Operators, LLC must comply with the requirements of this Combating Trafficking in Persons Compliance Plan as applicable by contract in accordance with Federal Acquisition Regulation (FAR) 52.222-50(h).

## Policy

As stated in FAR 52.22-50, the United States Government has adopted a policy prohibiting trafficking in persons, which provides, in pertinent part, as follows:

Contractors, contractor employees, and their agents shall not—

- (1) Engage in severe forms of trafficking in persons during the period of performance of the contract;
- (2) Procure commercial sex acts during the period of performance of the contract;
- (3) Used forced labor in the performance of the contract;
- (4) 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;
- (5) Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work, or;
- (6) Charge employees recruitment fees;
- (7) Fail to provide return transportation or pay for the cost of return transportation upon the end of employment [in specified circumstances];
- (8) Provide or arrange housing that fails to meet the host country housing and safety standards; or
- (9) 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. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, 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, and the content of applicable laws and regulations that prohibit trafficking in persons.

## Violations

Violations of the policy prohibiting trafficking in persons may result in removal from the contract and/or other disciplinary action up to and including termination of employment.

Violations of the policy prohibiting trafficking in persons by any subcontractor or agent may result in the imposition of suitable remedies, up to and including termination.

## Reporting

Employees may report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons, to their shoreside operations management team, to the Human Resources Department or to the Legal Department. Any credible information received from any source (including host country law enforcement) that a Hornbeck Offshore employee, subcontractor, subcontractor employee, or their agent has engaged in conduct that violates the policy referenced above must be reported immediately to Hornbeck Offshore's Legal Department.<sup>1</sup>

Employees may also communicate with Hornbeck Offshore (anonymously, if preferred) via the Ethics Helpline by making a report online at [www.hoscompliance.com](http://www.hoscompliance.com) or by telephone at 1-800-506-6374 (U.S.), 0800-891-1667 (Brazil), 001-800-840-7907 (Mexico), or 888-805-3405 (Trinidad). In addition, employees may contact the Global Human Trafficking Hotline at 1-844-888-FREE or via e-mail at [help@befree.org](mailto:help@befree.org).

## Recruitment and Wage Plan

Hornbeck Offshore prohibits charging recruitment fees to employees or potential employees. In connection with the performance of any portion of a contract subject to FAR 52.222-50, Hornbeck Offshore only permits the use of recruitment companies with trained employees. Wages must be paid in accordance with applicable legal standards.

## Housing Plan

Living accommodations on vessels shall meet applicable flag state requirements. In the event Hornbeck Offshore or its subcontractors provides or arranges on-shore housing, such housing shall meet host-country housing and safety standards.

## Agents and Subcontractors

Agents and subcontractors at any tier are prohibited from engaging in the activities prohibited by FAR 52.22-50, as applicable by contract. Hornbeck Offshore shall implement and maintain procedures to monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that engage in such activities.

## Posting

Hornbeck Offshore shall post the relevant contents of the Combating Trafficking in Persons Compliance Plan, no later than the initiation of contract performance, as provided in FAR 52.222-50(h)(4).

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<sup>1</sup> See notification requirements set forth in FAR 52.222-50(d).

