

RESOLVE MARINE GROUP, INC.

Combating Trafficking in Persons (CTIP)

Company Policy and Compliance Plan

Adopted pursuant to FAR 52.222-50, Combating Trafficking in Persons (Oct 2025), and the anti-trafficking requirements of the Trafficking Victims Protection Act (22 U.S.C. ch. 78) and Executive Order 13627.

Document owner	General Counsel / CTIP Compliance Officer
Applies to	Resolve Marine Group, Inc. and its employees, agents, and subcontractors at all tiers
Version	1.0
Effective date	24 July, 2026
Next review	Annually, or upon award of a new covered contract

1. Purpose

Resolve Marine Group, Inc. (“Resolve” or “Company”) is firmly committed to conducting its operations free of human trafficking, forced labor, and all related abuses. Human beings are never a commodity. This Combating Trafficking in Persons Compliance Plan (“Plan”) states Resolve policy and establishes the specific measures Resolve uses to prevent, detect, report, and remedy trafficking in persons in the performance of its contracts and subcontracts.

This Plan is adopted to satisfy Resolve’s obligations under Federal Acquisition Regulation (FAR) clause **52.222-50, Combating Trafficking in Persons**, and to provide documentary evidence that the Company maintains a compliance plan meeting the minimum requirements of FAR 52.222-50(h)(3). It supports the annual certification the Company must make under FAR 52.222-50(h)(5) and the pre-award certification under FAR 52.222-56.

2. Scope and Applicability

The prohibitions in Section 4 and the reporting, cooperation, and disciplinary provisions of this Plan apply to **all** Resolve contracts and subcontracts, at every dollar value and in every location, and bind every Resolve employee, agent, and subcontractor at all tiers.

The additional formal compliance-plan requirements in Section 5 — the awareness program, reporting process, recruitment and wage plan, housing plan, and subcontractor monitoring procedures — apply, and this written Plan must be maintained for the life of the contract, to any portion of a contract that:

1. is for supplies (other than commercially available off-the-shelf items) acquired outside the United States, or for services to be performed outside the United States; **and**
2. has an estimated value exceeding **\$700,000**.

Threshold note

The \$700,000 threshold above governs the requirement to maintain this written compliance plan under FAR 52.222-50(h). It is distinct from the **\$550,000** threshold that triggers the separate pre-award certification under FAR 52.222-56. Resolve applies this Plan whenever either threshold is met, and as a matter of policy treats the Plan's standards as its baseline company-wide.

3. Key Definitions

The following terms carry the meanings given in FAR 52.222-50(a). This is a working summary; the clause text controls.

- **Coercion** — threats of serious harm or physical restraint; any scheme intended to make a person believe that failure to act would result in such harm; or abuse or threatened abuse of the legal process.
- **Commercial sex act** — any sex act on account of which anything of value is given to or received by any person.
- **Debt bondage** — pledging personal services as security for a debt where the value of the services is not reasonably applied toward the debt, or the services are not limited and defined.
- **Forced labor** — knowingly obtaining labor or services through threats of serious harm, physical restraint, a coercive scheme, or abuse of law or legal process.
- **Recruitment fees** — fees of any kind associated with the recruiting process, however labeled or collected, including fees passed through recruiters, brokers, staffing firms, affiliates, or subcontractors at any tier.
- **Severe forms of trafficking in persons** — sex trafficking induced by force, fraud, or coercion (or involving a person under 18), and the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through force, fraud, or coercion for involuntary servitude, peonage, debt bondage, or slavery.
- **Agent** — any individual authorized to act on behalf of the Company, including a director, officer, employee, or independent contractor.
- **Subcontractor** — any supplier, distributor, vendor, or firm that furnishes supplies or services to or for the Company or another subcontractor.

4. Policy Statement — Prohibited Conduct

It is the policy of Resolve to comply fully with the United States Government's zero-tolerance policy on trafficking in persons. Resolve, its employees, and its agents **shall not** engage in any of the following prohibited activities during the period of performance of any contract:

#	Prohibited activity
1	Engaging in severe forms of trafficking in persons during the period of performance.
2	Procuring commercial sex acts during the period of performance.
3	Using forced labor in the performance of the contract.

#	Prohibited activity
4	Destroying, concealing, confiscating, or otherwise denying an employee access to their own identity or immigration documents (e.g., passports, drivers' licenses), regardless of issuing authority.
5	Using misleading or fraudulent recruitment practices — including failing to disclose, in a format and language the worker understands, the key terms and conditions of employment (wages, benefits, work location, living conditions, housing and associated costs, any significant costs charged to the worker, and hazardous work) — or using recruiters that do not comply with the local labor laws of the country where recruiting takes place.
6	Charging employees or potential employees recruitment fees of any kind.
7	Failing to provide, or pay the cost of, return transportation upon the end of employment for a worker brought into the country of performance to work on the contract (subject to the exceptions in the clause).
8	Providing or arranging housing that fails to meet host-country housing and safety standards.
9	Where required by law or contract, failing to provide a written employment contract, recruitment agreement, or other required work document in a language the worker understands, delivered at least five days before any required relocation.

Any employee, agent, or subcontractor who engages in any prohibited activity is subject to disciplinary action up to and including removal from the contract and termination of employment or of the subcontract, as described in Section 8.

5. Compliance Plan — Required Elements

The following measures constitute Resolve's compliance plan under FAR 52.222-50(h)(3). They are scaled to the size and complexity of each contract and to the nature and scope of the work, including the number of non-U.S. citizens expected to be employed and the risk that the work involves services or supplies susceptible to trafficking.

5.1 Awareness Program

The Company operates an awareness program to inform all covered employees about:

- the U.S. Government policy prohibiting trafficking-related activities described in Section 4;
- the specific activities that are prohibited; and
- the actions that will be taken against any employee, agent, or subcontractor who violates the policy.

The program is delivered before an employee begins work on a covered contract and refreshed at least annually. Training materials draw on resources published by the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons (state.gov/j/tip). Each employee acknowledges completion in writing; acknowledgments are retained by Resolve's General Counsel who is the Company CTIP Compliance Officer (see Appendix B).

5.2 Reporting Process and Non-Retaliation

Employees, agents, and subcontractor personnel may report any activity inconsistent with this Plan, and any suspected trafficking, through any of the following channels. Reports may be made confidentially, and — to the extent permitted by law — anonymously.

How to report a concern

- **Internally** — to the CTIP Compliance Officer, Andrea Jansz / General Counsel, at +1-954-764-8700 or ajansz@resolvemarine.com, or through the Company ethics hotline at integritycounts.ca/org/resolvemarine / 1-866-921-6714.
- **Global Human Trafficking Hotline** — **1-844-888-FREE** and help@befree.org.

Resolve **strictly prohibits retaliation** against anyone who reports a concern in good faith or who participates in an investigation. The hotline number and email above are made available to all employees through the posting required in Section 9.

5.3 Recruitment and Wage Plan

For any recruitment associated with a covered contract, Resolve:

- uses only recruitment companies whose employees are trained in these requirements, and that comply with the local labor laws of the country where recruiting takes place;
- prohibits charging any recruitment fee to employees or potential employees — **Resolve or its subcontractor, not the worker, bears all recruitment-related costs;**
- verifies and documents that wages meet applicable host-country legal requirements, and records a written explanation of any variance;
- discloses to each worker, before hire and in a language the worker understands, the key terms and conditions of employment (wages, benefits, work location, living conditions, any housing and associated costs, any significant costs charged to the worker, and any hazardous nature of the work); and
- where required by law or contract, provides a written work document in the worker's language at least five days before any required relocation, covering the items listed in FAR 52.222-50(b)(9).

5.4 Housing Plan

Where Resolve or a subcontractor provides or arranges housing for workers on a covered contract, the responsible Project or Site Manager confirms and documents — before occupancy and by periodic inspection — that the housing meets the **host-country housing and safety standards**. Deficiencies are corrected promptly and the correction is recorded. Where no housing is provided or arranged, this element is documented as not applicable for that contract.

5.5 Preventing and Monitoring Agents and Subcontractors

Resolve maintains procedures to prevent agents and subcontractors — at any tier and any dollar value — from engaging in trafficking in persons, and to monitor, detect, and terminate any agent, subcontract, or subcontractor employee that does. These procedures include:

- flowing the substance of FAR 52.222-50 (including its subcontracts paragraph) into every subcontract and every agreement with an agent (see Section 10);
- risk-screening prospective agents and subcontractors before engagement, with heightened diligence for work performed outside the United States and for labor-intensive or high-risk services and supplies;
- obtaining the required certification from covered subcontractors before award and annually thereafter;

- monitoring performance for indicators of trafficking, including document retention practices, recruitment-fee practices, wage practices, and housing conditions; and
- taking appropriate action — up to and including terminating the agent relationship or subcontract — when a violation is detected.

6. Notification to the Government

Resolve will inform the Contracting Officer and the agency Inspector General **immediately** of:

- any credible information, from any source (including host-country law enforcement), alleging that a Resolve employee, agent, subcontractor, or subcontractor employee has engaged in conduct violating the policy in Section 4; and
- any action Resolve takes against an employee, agent, subcontractor, or subcontractor employee pursuant to this Plan.

If an allegation may relate to more than one contract, Resolve will notify the Contracting Officer for the contract with the highest dollar value. The CTIP Compliance Officer is responsible for making these notifications and for coordinating with counsel.

7. Full Cooperation with Investigations

If a violation is alleged, Resolve will cooperate fully with Government audits and investigations. At a minimum, Resolve will:

- disclose to the agency Inspector General information sufficient to identify the nature and extent of any offense and the individuals responsible;
- provide timely and complete responses to Government auditors' and investigators' requests for documents;
- provide reasonable access to its facilities and staff, inside and outside the United States, for audits and investigations; and
- protect any employee suspected of being a victim of, or witness to, prohibited activity before that person returns to their country of recruitment, and not hinder their cooperation with Government authorities.

This commitment does not require Resolve to waive attorney-client privilege or work-product protection, does not require any individual to waive privilege or Fifth Amendment rights, and does not restrict Resolve from conducting an internal investigation or defending a dispute under the contract.

8. Enforcement, Discipline, and Remedies

Resolve takes appropriate action, up to and including termination, against any employee, agent, or subcontractor that violates the policy in Section 4. Actions against employees may include removal from the contract, reduction in benefits, or termination of employment; actions against subcontractors may include termination of the subcontract.

Resolve understands that its own failure to comply with the requirements of FAR 52.222-50 may expose it to Government remedies including removal of personnel, termination of a subcontract, suspension of contract

payments, loss of award fee, non-exercise of options, termination for default or cause, and suspension or debarment. Maintaining and following this Plan, and taking prompt remedial action (which may include reparation to victims), is treated by Resolve as essential — both to prevent harm and because it is a **mitigating factor** the Contracting Officer may weigh in the event of a violation.

9. Posting and Distribution

No later than the initiation of performance of a covered contract, Resolve will post the relevant contents of this Plan — including the prohibited activities and the reporting channels and hotline information — at the workplace and on the Resolve website. Where work is performed in the field or not at a fixed location, or where posting is otherwise impracticable, Resolve will provide the relevant contents of this Plan to each worker in writing, in a language the worker understands. The Company will provide the full Plan to the Contracting Officer upon request.

10. Flow-Down to Subcontracts and Agents

Resolve will include the substance of FAR 52.222-50 — including its subcontracts paragraph — in all subcontracts and in all contracts with agents. Where a subcontract includes a portion that is for supplies (other than COTS items) acquired outside the United States, or services performed outside the United States, with an estimated value exceeding \$700,000, Resolve will require the subcontractor to maintain its own compliance plan and to submit the certification described in Section 11 before award and annually thereafter.

11. Annual Certification

Annually after award of a covered contract, the CTIP Compliance Officer will submit a certification to the Contracting Officer stating that Resolve:

1. has implemented a compliance plan to prevent the activities prohibited in Section 4 and to monitor, detect, and terminate any agent, subcontract, or subcontractor employee engaging in those activities; and
2. after conducting due diligence, either (a) to the best of Resolve's knowledge and belief, neither it nor any of its agents, subcontractors, or their agents is engaged in any such activity; or (b) if abuses have been found, Resolve or subcontractor has taken the appropriate remedial and referral actions.

A certification template is provided at Appendix A.

12. Roles and Responsibilities

Role	Responsibility
CTIP Compliance Officer	Owns this Plan; maintains it for the life of each covered contract; delivers the awareness program; investigates reports; prepares and signs the annual certification; serves as point of contact for Contracting Officers and Inspectors General.
Human Resources / Recruiting	Vets and contracts recruitment companies; verifies no recruitment fees are charged; confirms wages meet host-country requirements; retains signed work documents in the required language.

Role	Responsibility
Project / Site Managers	Enforce the Plan at the place of performance; ensure workers keep custody of their own identity documents; verify housing (where provided) meets host-country standards; surface concerns immediately.
Procurement / Subcontracts	Flow the clause down into every subcontract and agent agreement; collect subcontractor certifications before award and annually; monitor and, where required, terminate non-compliant agents or subcontractors.
All Employees & Agents	Comply with this Plan; complete awareness training; report suspected violations without fear of retaliation.

13. Recordkeeping and Review

The CTIP Compliance Officer maintains, for the life of each covered contract plus the period required by Resolve's records-retention schedule, the records that evidence this Plan in operation: training materials and signed acknowledgments, recruitment and wage documentation, housing inspections, subcontractor certifications, reports received and their disposition, Government notifications, and the annual certifications. This Plan is reviewed at least annually and upon award of any new covered contract, and is updated to reflect changes in FAR 52.222-50 or in Resolve's operations.

14. Approval and Adoption

This Combating Trafficking in Persons Compliance Plan is adopted by Resolve Marine Group, Inc. and is effective as of the effective date shown on the cover. It is approved by:



Signature

Andrea Jansz

Name

General Counsel / CTIP Compliance Officer

Title

24 July 2026

Date

Appendix A — Annual Compliance Certification

Certification period: 24 July 2026 – 1 July 2027

On behalf of Resolve Marine Group, Inc., and pursuant to FAR 52.222-50(h)(5), the undersigned certifies that:

3. The Company has implemented a compliance plan to prevent the activities prohibited under FAR 52.222-50(b) and to monitor, detect, and terminate any agent, subcontract, or subcontractor employee engaging in such prohibited activities; and
4. After conducting due diligence, either:
 - to the best of the Company's knowledge and belief, neither the Company nor any of its agents, subcontractors, or their agents is engaged in any such prohibited activity; or
 - if abuses relating to any prohibited activity have been found, the Company or subcontractor has taken the appropriate remedial and referral actions.



Authorized signature

Andrea Jansz

Name

General Counsel / CTIP Compliance Officer

Title

24 July 2026

Date

Appendix B — Employee Awareness Acknowledgment

I acknowledge that I have received and understood training on Resolve Marine Group, Inc.'s Combating Trafficking in Persons policy. I understand the activities that are prohibited, that violations may result in disciplinary action up to and including termination, and that I may report concerns without fear of retaliation through the Company's reporting channels or the Global Human Trafficking Hotline (1-844-888-FREE; help@befree.org).

Training Module Undertaken [please check as many as apply]:

☐ The U.S. Department of Transportation video "Combatting Human Trafficking in the Transportation Sector Awareness Training": <https://youtu.be/ZtYXhSqx1wo>

☐ Resolve Compass training module: Combating Trafficking in Persons (CTIP)

☐ Other, please specify: _____

Employee name

Employee signature

Date