



## Anti-Human Trafficking Compliance Plan

IBI has developed this Anti-Human Trafficking Compliance Plan in compliance with the U.S. Government's anti-trafficking compliance and certification requirements specified under:

- 1) FAR 52.222-50 (Combating Trafficking in Persons) for contracts and
- 2) ADS 303 Mandatory Standard Provision (Trafficking in Persons, July 2015) for cooperative agreements,

It is required by the FAR and Mandatory Standard Provisions that all recipients of US federal funding prepare a tailored anti-trafficking compliance plan under:

- 1) contracts and subcontracts for:
  - a. supplies (excluding commercially available off-the-shelf items) to be acquired outside the US having an estimated value of over USD 550,000 and
  - b. services to be performed outside of the US, having an estimated value of over USD 550,000.
- 2) cooperative agreements when the value of the agreement exceeds USD 500,000.

Key elements of an Anti-trafficking compliance plan include:

- 1) Anti-trafficking policy, communicated to **all** employees;
- 2) Awareness program;
- 3) Process/mechanism for employees to report potential trafficking violations without fear of retaliation;
- 4) Compliant recruitment and wage practices shared with employees;
- 5) Standard protocols for compliant housing employees in the US and abroad;
- 6) Developed procedures that prevent agents, subcontractors and subawardees from engaging in trafficking in persons.

Two exceptions to compliance with FAR 52.222-50 are:

- 1) contracts and subcontracts that are performed exclusively in the United States;
- 2) contracts and subcontracts that provide commercially available off-the-shelf items.

No person employed by IBI shall:

- engage in any form of trafficking in persons,
- procure commercial sex acts,
- destroy, conceal, confiscate, or otherwise deny access by an individual to the individual's identity or immigration documents,
- use misleading or fraudulent practices during the recruitment of employees or offering of employment under the project, including charging recruitment fees, or any other prohibition as provided under FAR 52.222-50.

Participation in such acts will result in disciplinary action up to and including termination, the reporting of the employee's actions to other parties, including law enforcement authorities and client agencies when required, and/or other penalties as defined in FAR 52.222-50.

Additional awareness information about trafficking in persons may be found at the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons website at <http://www.state.gov/j/tip>.

### Awareness Program

The Awareness Program instituted by IBI informs employees about the policy prohibiting trafficking-related activities as described below. Pursuant to the terms of the prime contract, specifically, FAR 52.222-50,

Combating Trafficking in Persons, IBI's employees and agents, as well as its subcontractors and sub-awardees and their employees and agents, are forbidden to:

- Recruit, harbor, transport, provide, or obtain persons, through the use of force, fraud, and/or coercion, and subject any person to involuntary servitude; and/or procure commercial sex acts from any person;
- Procure any sex act in exchange for anything of value and/or of perceived value;
- Use forced labor in the performance of a contract, cooperative agreement, or sub-award;
- Deny any employee access to his/her identity or immigration documents;
- Use misleading or fraudulent practices during the recruitment of any employee(s) and/or the offer of employment;
- Use recruiters who violate US and or the applicable labor laws where the recruitment occurs;
- Charge employee(s) recruitment fees;
- Withhold or fail to provide and/or pay the cost for an employee's return transportation upon the end of his/her employment (for employees who are not local nationals of the host/cooperating country where the work occurs and who traveled to the host/cooperating country to work on a project contract, subcontract, cooperative agreement, or sub-award);
- Provide or arrange housing that fails to meet the host/cooperating country housing and safety standards (if IBI provides or arranges for the employee's housing); and/or
- Fail to provide an employment and/or recruitment agreement, or other required work documents in writing as required by applicable US or local law or the contract, cooperative agreement, or sub-award.

Any violation of FAR 52.222-50 could result in immediate termination of the subcontract or contract.

IBI trains all employees on its zero-tolerance policy regarding trafficking in persons through online and off-line workshops delivered at project startup and on an annual basis. Workshops include a definition of trafficking in person to promote understanding of the issue, an explanation of trafficking indicators and signs, discussion on contract/country-specific trafficking risks, and communication of methods and tools available to report potential trafficking violations.

Overall awareness of IBI's Anti-Trafficking measures is achieved through the following methods:

- 1) display of multi-lingual anti-trafficking posters in the common areas of the company offices (HQ and overseas)
- 2) display of "how to report concerns" posters in the common areas of the company offices (HQ and overseas);
- 3) onboarding and recurring annual trainings of staff;
- 4) provision of the IBI project management policy manual that specifies the company's Anti-Trafficking policies and procedures, requiring employees to read, sign and date the document.

## **EMPLOYEES**

IBI employees are expected to report any credible information of violations of this policy. As specified above, IBI employees are also required to complete annual anti-human trafficking awareness training.

FAR 52.222-50 and ADS 303 Mandatory Standard Provisions require the awardee to put in place a process for employees to report, without fear of retaliation, any activity that breaches the policy prohibiting trafficking in persons, including a means to make available to all employees the hotline phone number of the Global Human Trafficking Hotline 1-844-888-FREE and its email address at [help@befree.org](mailto:help@befree.org).

IBI has the following channels for anonymous reporting:

- 1) E-mail the confidential help desk at [reporthelp@ibi-usa.com](mailto:reporthelp@ibi-usa.com)

Last Updated: August 9, 2023

- 2) Complete this [online reporting form](#)

## SUBCONTRACTORS/SUPPLIERS

Subcontractors and sub-awardees (at any tier) for agreements over USD 550,000 must certify annually and must receive materials and orientation appropriate for their level of capacity. A copy of all subcontractor certifications is maintained on file with IBI home office project management unit.

For work performed outside the US, the requirements found in Mandatory Standard Provision M.2, Trafficking in Persons (April 2016), are incorporated into agreements with subcontractors and vendors, with the exception of suppliers of commercially available off-the-shelf items.

Subgrants and Grants under Contracts (GUCs) will incorporate appropriate mandatory provisions for non-U.S. Non-Governmental Organizations on Combatting Trafficking in Persons, as dictated by USAID's ADS 303.

Vendor plans:

- For small vendors, all required certifications will be included in their respective Purchase Orders.
- For mid-size vendors IBI's Awareness Handout will be shared at the kick-off meeting. To increase awareness, IBI may ask vendor to initial TIP section of agreement.
- For largers vendors, and definitely for vendors with awards over USD550,000, IBI will provide an Awareness Handout and the Subcontractor Compliance Plan Template. IBI employees may also attend TIP awareness events or meetings that it holds for its employees.

## REPORTING

IBI Employees:

(1) Shall immediately inform their supervisor if they become aware of credible information of human trafficking.

(1) May report suspected or actual human trafficking activities via any of the following methods:

- Contacting IBI at [reporthelp@ibi-usa.com](mailto:reporthelp@ibi-usa.com).
- Contacting the Global Human Trafficking Hotline at 1-844-888-FREE or at its email address at [help@befree.org](mailto:help@befree.org).

Under 41 U.S.C. §4712, IBI employees can be confident that they may comply with their responsibility to report suspected instances of human trafficking in good faith, without fear of retaliation, and subject to protection from reprisal for whistleblowing on trafficking in persons violations, or any activity that violates the contract clause or cooperative agreement standard provision.

## RECRUITMENT AND WAGE PLAN

IBI employees are not permitted to use recruiters who charge recruitment fees to potential employees. Wages must meet the requirements of the host country. Recruiting companies that are used by IBI must have Anti-Trafficking trained employees.

Furthermore, as required by law and/or the project contract or agreement, an employee's work document (employment contract, recruitment offer, or other required work documents) shall be in a language the employee understands; and as required by law and/or the project contract or agreement, an employee's work document(s) will include details such as a work/position description, wages, prohibition on charging recruitment fees, work location(s), living accommodation(s) and associated costs (if applicable), time off, roundtrip transportation arrangements (if applicable), grievance process, and the content of the applicable laws, regulations, and IBI policies which prohibit the trafficking in persons and the use of forced labor.

## HOUSING PLAN

If housing is provided, it should be sanitary, with adequate living space for each employee. Employees living in the provided housing must be free to come and go at will. There should be easy access to a telephone or payphone. If employers are in the possession of employee's passports, immigration forms, or any form of identification, employees shall have the right to access these documents at all times.

Housing for Long-Term Expatriate and TCN Staff: all landlords are vetted through SAM, prior to lease-execution. Each review takes into consideration multiple risk factors: DSSR, FAH, FAM, standard IBI policies and safety considerations, local law as required, the eligibility of landlords to receive U.S government funds.

Housing for Short-Term Staff: IBI funds and selects the hotels at the safest and convenient locations.

## COMPLIANCE PLAN COMPONENTS

IBI is required to have procedures to prevent its agents, subcontractors, sub-recipients, and grantees at any tier and at **any dollar value** from engaging in trafficking in persons. IBI is also required to monitor, detect, and terminate any agents, subcontracts, and grantees that have engaged in such activities.

***Guidance and Certifications for Subcontractors and Sub-Recipients.*** IBI has developed several documents to support its work with subcontractors:

- 1) An annual Certification Regarding Trafficking in Persons Template (annual certification form to Prime Contractor), which all applicable subcontractors must sign before receiving an award
- 2) Training PowerPoint

Applicable subcontractors are those awarded subcontracts for supplies, other than commercially available off-the-shelf items, to be acquired outside of the U.S., **or** services to be performed outside of the United States, **and** which have an estimated value above USD 550,000. When requested, the guidance is provided to any subcontractor/offeror receiving an award in excess of USD 550,000 and performing the work outside of the United States.

All applicable templates used by IBI, including subcontract templates and procurement document templates are updated to include the requirements of the anti-trafficking clause.

All grantees under Grants under Contract (GUC) mechanism with funding exceeding USD 500,000 are required to certify compliance with the ADS 303 Mandatory Standard Provisions. An Annual Certification Regarding Trafficking in Persons Compliance Plan is obtained from all applicable grantees prior to making the award.