

IDRT Anti-Trafficking Compliance Plan

Background and Purpose

IDRT has developed this Anti-Trafficking Compliance Plan (“Plan”) in accordance with the U.S. Government’s zero-tolerance policy regarding trafficking in persons by government contractors and award recipients, as set out in FAR Subpart 22.17 and 52.222-50(h), and in USAID Standard Provision M20 for U.S. Nongovernmental Organizations (“Anti-Trafficking Provisions”). The purpose of this Plan is to set out IDRT’s policies and procedures for: (1) making IDRT employees aware of the conduct prohibited under IDRT policy and the Anti-Trafficking Provisions and the actions that may be taken against employees for violations; (2) employing fair recruitment, wage and housing practices; and (3) preventing prohibited trafficking activity by suppliers, subcontractors and sub-recipients, and monitoring, detecting and terminating those who engage in such activities.

Applicability

This Plan sets out IDRT’s baseline standards for anti-trafficking compliance and applies presumptively to all U.S. Government contracts, subcontracts, cooperative agreements, awards and sub-awards. However, it may need to be adapted or modified for projects that are larger, more complex, or involve greater risk of trafficking activity. For all contracts and awards with an estimated value of \$500,000 or more, or involve activities outside the U.S., Project staff must examine each one individually to assess the risk of trafficking activity, based on factors such as the number of non-U.S. citizens to be employed and whether the contract or award will involve services or supplies susceptible to trafficking in persons. Project staff must adapt or modify the Plan as necessary to ensure that it is appropriate to the size and complexity of the contract or award and the nature and scope of the activities to be performed.

Employee Awareness Program

IDRT has adopted a policy on Combating Trafficking in Persons (“Policy”) that reflects the Anti-Trafficking Provisions’ provisions prohibiting trafficking-related activities, describes the actions IDRT may take against employees and agents who violate the Policy, and sets out the procedure for reporting and investigating Policy violations.

IDRT distributes the Policy to all IDRT personnel and contractors upon hire and annually.

Upon initial adoption, all IDRT personnel will be notified of the new Policy via a company-wide email containing an attachment to the Policy with instructions to review the Policy. Thereafter, IDRT will send annual email reminders to all personnel directing them to review the Policy and summarizing any Policy updates.

All new personnel are required to read and acknowledge the Policy at the time of hire and must also read the Mandatory Standard Provisions-Desk Guide and Trafficking-in-Persons Plan Summary Desk Guide.

IDRT also periodically conducts specialized training on the Anti-Trafficking Provisions, the Policy and the Compliance Plan on an as-needed basis.

Recruitment and Wage Plan

IDRT prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. IDRT must fully and accurately disclose, in a format and language accessible to the employee, all key terms and conditions of employment, including wages and benefits, work location, living conditions, housing and associated costs (where provided or arranged by IDRT), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

IDRT prohibits the use of recruiters that do not have trained employees, or that do not comply with all labor laws of the country where the recruitment takes place.

IDRT prohibits charging recruitment fees to any employee.

IDRT will pay wages to all employees that meet applicable host-country legal requirements or will explain any variance.

Where required by law or contract, IDRT will provide to every employee an employment contract, recruitment agreement, or other required work document, written in a language the employee understands, containing all required information about the terms of conditions of employment, which may include, by way of example, the work description, wages, work location, living accommodations and associated costs, time off, transportation arrangements, grievance process, the content of applicable laws and regulations prohibiting trafficking in persons, and the prohibition on recruitment fees. If the employee must relocate to perform the work, IDRT will provide the required work document at least five (5) days prior to relocation.

IDRT prohibits destroying, concealing, confiscating, or otherwise denying any employee access to his or her identity or immigration documents.

IDRT will provide or pay the cost of return transportation at the end of employment for any employee who is not a national of the country where the work took place and was brought into that country by IDRT for purposes of working on a covered US Government contract or award.

IDRT will provide or pay the cost of return transportation at the end of employment for any employee who is not a US national and was brought into the US for purposes of working on a covered US Government contract or award, if payment of such costs is required under existing temporary work programs or pursuant to a written agreement with the Worker for portions of contracts and awards performed outside the US.

Housing Plan

In situations where IDRT provides housing to employees, the housing will meet host country housing and safety standards.

Supplier Compliance

All IDRT contractors, consultants, vendors, suppliers, subcontractors and sub-recipients (“Suppliers”) must agree to comply with the Policy and all applicable Anti-Trafficking Provisions. IDRT will translate such upon request into any major language needed by such.

All IDRT Suppliers must have a compliance plan to prevent prohibited trafficking-related activities and to monitor, detect and terminate any of its contractors, consultants, suppliers, subcontractors or sub-recipients engaging in prohibited trafficking-relating activities, and provide a copy of its plan to IDRT. The Supplier’s compliance plan must meet the minimum requirements in the Anti-Trafficking Provisions and be appropriate to the size and complexity of the contract, subcontract or sub-agreement with IDRT and the nature of the activities to be performed under it.

Prior to the award of any Supplier Contract, and on an annual basis thereafter, all IDRT Suppliers must submit a certification to IDRT:

- That the Supplier has implemented a compliance plan and has complied with its plan such a compliance plan; and
- That after conducting due diligence, to the best of the Supplier’s knowledge and belief, neither it nor any of its employees, or its contractors, consultants, suppliers, subcontractors, sub-recipients or their employees, have engaged in any prohibited trafficking-related activities, or if any abuses relating to prohibited trafficking-related activities have been found, Supplier has taken appropriate remedial and referral actions.

For Suppliers and Supplier Contracts that may be more susceptible to trafficking-related activities, IDRT may, in situations where it has direct access, inspect the Supplier’s workplace or any housing provided by the Supplier for signs of trafficking-related activities. In lower-risk situations, and in situations where the Supplier is distant, IDRT will review the plans and certifications of its Suppliers to ensure they include adequate monitoring procedures and reporting mechanisms.

If any Supplier fails to comply with the Policy or applicable Anti-Trafficking Provisions, IDRT will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

- Requiring the Supplier to remove an employee or agent from a project
- Requiring the Supplier to terminate its relationship with any Supplier contractor, consultant, supplier, subcontractor, or sub-recipient

- Suspending payments to Supplier until violation is remedied
- Immediately terminating the Supplier Contract

Reporting Requirements and Procedure

All IDRT personnel, Suppliers and Supplier Personnel are required to report any suspected trafficking related activity or violation of this policy to IDRT's President for action.

IDRT personnel and Supplier Personnel who believe they or others have been subjected to prohibited trafficking-related activities may report the activity as outlined above, or may contact the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

IDRT's President will investigate all reports of prohibited trafficking-related activity or violations of this policy and take appropriate action. IDRT's President will make all required notifications to government agencies, as more fully set out in the Model Compliance Plan.

IDRT strictly prohibits retaliation against any IDRT employee who reports prohibited trafficking related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. IDRT personnel who engage in any form of retaliation against those who report prohibited trafficking-related activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment with IDRT.

Investigations

If IDRT receives credible information from an employee report or any other source alleging prohibited trafficking-related activity, IDRT's President will conduct an investigation and report its findings and determine what, if any, remedial action is appropriate.

IDRT's President will be responsible for immediately notifying the contracting officer and the appropriate agency Inspector General of the information received and any resulting remedial action taken.

IDRT will cooperate fully with any US Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to IDRT facilities and staff.

IDRT will protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and will not prevent or hinder these employees from cooperating fully with US government authorities.

Posting

IDRT will post this Plan on its external website, www.idrt.com. IDRT will also post this Plan at all workplaces, except where the work is being performed in the field or not otherwise at a fixed location.