

PROTECTIONS AGAINST TRAFFICKING IN PERSONS POLICY

This document describes the program requirements and processes established and implemented by the International Legal Foundation (hereafter referred to as 'the Company') to comply with FAR 52.222-50, Combating Trafficking in Persons. The scope of the plan includes the operations and activities of the Company as well as those subcontractors and agents in its supply chain performing on this contract. This Plan is maintained by the Corporate Human Resources Office located at 315 West 39th Street, Suite 507, New York, NY 10018. The individual responsible for the plan implementation is listed below.

CONTRACTOR NAME: The International Legal Foundation

ADDRESS: 315 West 39th Street, Suite 507, New York, NY 10018

DUNS NUMBER: 830408014

NAME AND CONTACT INFORMATION OF THE PERSON RESPONSIBLE FOR PLAN (COMPLIANCE OFFICER): Tara Mullaney, tmullaney@theilf.org, +1-212-608-1188

CONTRACT NUMBER: 72048218

CONTRACT TITLE: Promoting Rule of Law in Myanmar

LOCATION OF PERFORMANCE: Myanmar

CONTRACT PERIOD OF PERFORMANCE: January 16, 2020 to January 15, 2021

CONTRACTING AGENCY: Chemonics/USAID

CONTRACTING OFFICER: Lori Ke, Chemonics

The Company strictly prohibits its employees and all subcontractors and agents from:

- engaging in severe forms of trafficking in persons;
- procuring commercial sex acts;
- using trafficked labor;
- destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- using 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 employee, 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 costs to be charged to the employee, and, if applicable, the hazardous nature of the work; Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;

- charging employees recruitment fees (as defined by the FAR);
- failing to pay return transportation costs upon the end of employment, for certain employees who are not nationals of the country in which the work is taking place (with some exceptions as specified under FAR 52.222.50(b)(7));
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document in writing in a language the employee understands, containing a detailed description of the terms and conditions of employment, at least five days before an employee relocates to perform work.

Employee Awareness Program

The Company has developed and implemented an awareness program to inform all employees about the FAR's prohibitions against trafficking-related activities described in FAR 52.222-50(b), the activities prohibited, and the actions that will be taken against the employee for violations. Those employees are trained on:

- the Company Human Trafficking Policy and Supplier Code of Conduct;
- consequences for violating Company policy;
- the violation reporting process, and
- a summary of the U.S. Government's policy prohibiting trafficking related activities

Employees should be trained both when hired and on an annual basis. They should also be provided with written materials that include all subjects covered in the training. Both the training and written materials are in each employee's own language. A verbal explanation of the contents is given upon request to individuals unable to read the printed information.

Employee Reporting/Grievance Process

Any person may report a Suspected Violation, either in written or oral form. The complaint submitted should include whatever documentation is available to support a reasonable basis for the allegation(s) and to assist in investigating the complaint.

All reports, either in written or oral form, should be directed to the Compliance Officer. If the Compliance Officer is the subject of the Suspected Violation or the person is not comfortable reporting a complaint concerning a Suspected Violation to the Compliance Officer or is unsatisfied with the response, the Whistleblower is encouraged to instead speak with his or her supervisor or anyone in management with whom he or she is comfortable. In such case, the manager to whom such Suspected Violation is reported shall in turn report such Suspected Violation to the Compliance Officer, unless the

Compliance Officer is the subject of the complaint, in which case the manager shall submit the report to the Audit Committee. If the Compliance Officer is the subject of the complaint, the Audit Committee shall designate someone to act in the place of the Compliance Officer and all references to the Compliance Officer in this Policy with respect to such complaint shall be applicable to such designee. Such report shall include a statement as to whether such Suspected Violation was reported first to the Compliance Officer; if it was not, the report shall indicate why the Suspected Violation was not reported to the Compliance Officer. The person who is the subject of a complaint may not be present at or participate in the committee deliberations or voting related to the complaint, unless that person is requested by the Board or committee to present background information or answer questions prior to the commencement of deliberations or voting relating thereto.

Recruitment and Wage Plan

The Company strictly prohibits misleading or fraudulent recruiting practices during the recruitment of both local and migrant employees. All labor recruiters working for or with the Company and its suppliers and subcontractors have committed to provide complete and accurate information to all employees regarding the assignment they are being offered (see below).

The Company audits subcontractors and suppliers, including labor recruiters without advance notice, on a regular basis, and requires remediation of all identified nonconformities. Failure to properly address audit issues will have business consequences, up to and including termination and disbarment from future contracts. Any violations of FAR requirements could result in the Company terminating the contract of a subcontractor or agent. Additionally, the Company will report all identified violations of FAR 52.222-50 (b) and remedial action(s) taken, as well any credible information it receives from any source that alleges conduct in violation of FAR 52.222-50 (b) to the Contracting Officer.

All subcontractors to the Company provide all employees with an employment contract/employment agreement in writing, containing a detailed description of the terms and conditions of their employment, where such contract is required by law or contract.

Contracts are written in a language that the employee understands and are provided to them for review and signature at least five days prior to start date.

Housing Plan

The Company may require that employees travel to other cities or countries as part of their job, and ensures accommodations are safe and sanitary. The Finance and Administration Manager regularly monitors the accommodations standards of the Company rented facilities and any hotels that are used.

Violation Monitoring, Reporting and Remediation

The Company has established a performance monitoring, detection, and remediation program to identify and address on an ongoing basis, any violations of the requirements of FAR 52.222-50(b) and the Company Human Trafficking Policy. In the event of the receipt of credible information alleging violation of FAR 52.222-50(b), the Company will immediately:

- notify the Contracting Officer and the agency Inspector General of the specific nature of the activity, including specific remedial actions taken, and
- take appropriate corrective and preventive action, up to and including the dismissal of Company employees and termination of contracts with subcontractors, suppliers and agents.

All subcontractors of the Company are required by contract to fully cooperate with Company staff, contracting agencies and other Federal agencies to conduct audits and investigations on compliance with the provisions of FAR 52.222-50(b), Combating Trafficking in Persons. Company subcontractors and agents have also provided the Company with copies of their Compliance Plans prepared in accordance with Company requirements and FAR 52.222-50(h).

The Company requires its subcontractors and agents whose subcontracts are covered by 52.222-50(i)(A) and (B) to certify prior to subcontract award and annually thereafter that they have implemented compliance plans that comply with 52.222-50(h) and that, after having conducted due diligence, either (1) To the best of the subcontractor's knowledge and belief, neither it nor any of its agents, subcontractors, or their agents, has engaged in any such activities; or (2) If abuses relating to any of the prohibited activities identified in 52.222-50(b) have been found, the subcontractor has taken the appropriate remedial and referral actions.

Additionally, all subcontractors have agreed to on-going monitoring and random auditing by the Company or its agents for compliance with FAR 52.222-50 and the Company Human Trafficking Policy. Any credible indication of noncompliance will be investigated, reported and addressed accordingly.

Failure to comply with the requirements of the FAR 52.222-50 is grounds for the Company to take any and all appropriate actions, up to and including immediate termination of that supplier's contract with the Company.