



***APPROVED***

By the general meeting of participants  
LLC "Info Sapiens"

Minutes №20/12/2021-1 of 20.12.2021

## **Prohibiting Trafficking in Persons Policy Model Compliance Plan**

### **Purpose of the Compliance Plan**

INFO SAPIENS LLC has adopted a zero tolerance policy regarding trafficking in persons and have worked to establish Policy Prohibiting Trafficking in Persons ("Policy").

The Policy prohibits individuals from:

- Engaging in trafficking in persons
- Procuring commercial sex acts
- Using forced labor in the performance of the award
- Directly supporting or advancing trafficking in persons

INFO SAPIENS LLC has developed this Model 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 52.222-50, and in the USAID Standard Provision "Trafficking in Persons".

The purpose of this Plan is to set out INFO SAPIENS LLC's policies and procedures for:

- (1) making INFO SAPIENS LLC's employees aware of the conduct prohibited under INFO SAPIENS LLC's 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 subcontractors and suppliers/vendors, and monitoring, detecting and terminating those who engage in such activities.

### **Applicability**

This Plan applies to all cooperative agreements, contracts, subcontracts, subawards and all non-U.S. government funded awards. The Plan may need to be adapted or modified for projects that are larger, more complex, or involve greater risk of trafficking activity.



The Plan applies to all INFO SAPIENS LLC employees, consultants, and volunteers. It also applies to all INFO SAPIENS LLC contractors, vendors, suppliers, subcontractors and subrecipients (“Suppliers”).

### **Employee Awareness Program**

INFO SAPIENS LLC has adopted a Policy Prohibiting Trafficking in Persons that describes the actions INFO SAPIENS LLC may take against employees and agents who violate the Policy, and sets out the procedure for reporting and investigating Policy violations.

INFO SAPIENS LLC will make the Policy and this Plan available to all employees through our internal electronic file sharing system and outreach.

All new personnel are required to read and acknowledge the Policy.

### **Recruitment and Wage Plan**

INFO SAPIENS LLC prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. INFO SAPIENS LLC employees 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 INFO SAPIENS LLC), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

INFO SAPIENS LLC 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.

INFO SAPIENS LLC prohibits charging recruitment fees to any employee.

INFO SAPIENS LLC will pay all employees wages that meet applicable host-country legal requirements, or will explain any variance.

Where required by law or contract, INFO SAPIENS LLC 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 and 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.

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

INFO SAPIENS LLC 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 INFO SAPIENS LLC for purposes of working on a covered U.S. Government contract or award.



## **Housing Plan**

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

## **Supplier Compliance**

All Suppliers must agree to comply with the Policy and all applicable Anti-Trafficking Provisions. INFO SAPIENS LLC will include language to that effect in all Lower-Tier Awards, including inserting FAR 52.222-50 and USAID Standard Provisions where applicable.

All INFO SAPIENS LLC Suppliers with contract values exceeding \$100,000 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 subrecipients engaging in prohibited trafficking-related activities, and provide a copy of its compliance plan to INFO SAPIENS LLC.

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 subagreement with INFO SAPIENS LLC 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 INFO SAPIENS LLC Suppliers with contract values exceeding \$100,000 must submit a certification to INFO SAPIENS LLC:

- That the Supplier has implemented a compliance plan and has complied with its 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, subrecipients 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.

If any Supplier fails to comply with the Policy or applicable Anti-Trafficking Provisions, INFO SAPIENS LLC 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 contractor, consultant, supplier, subcontractor or subrecipient;
- Suspending payments to Supplier until violation is remedied; and/or
- Immediately terminating the Supplier Contract.

## **Reporting Requirements and Procedure**

For all INFO SAPIENS LLC implemented programs, all INFO SAPIENS LLC personnel, Suppliers and Supplier Personnel are required to report suspected trafficking related activity or violations of the Policy Prohibiting Trafficking in Persons to the management of INFO SAPIENS LLC (Director). Reports may be made anonymously at [official@sapiens.com.ua](mailto:official@sapiens.com.ua).



Reports may be made to any INFO SAPIENS LLC supervisor or manager. Any INFO SAPIENS LLC manager who receives such a report is required to immediately forward the report to INFO SAPIENS LLC's Director or Senior Legal Advisor.

Human Resources or Top Management will investigate all reports of prohibited trafficking related activity or violations of the Policy Prohibiting Trafficking in Persons and take appropriate action.

### **No Retaliation Policy**

INFO SAPIENS LLC strictly prohibits retaliation against any INFO SAPIENS LLC employee who reports any violations of the Policy Prohibiting Trafficking in Persons, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. INFO SAPIENS LLC personnel who engage in any form of retaliation against those who report prohibited trafficking related activities or other violations of the Policy are subject to disciplinary action, up to and including termination of employment with INFO SAPIENS LLC.

### **Investigations**

If INFO SAPIENS LLC receives credible information from any source that alleges that an employee, recipient, contractor, sub-awardee, vendor/supplier or agent has engaged in any of the Prohibited Activities, INFO SAPIENS LLC must immediately notify the cognizant Agreement or Contracting Officer and the applicable U.S. Government Agency Office of the Inspector General.

INFO SAPIENS LLC will cooperate fully with any U.S. 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 INFO SAPIENS LLC facilities and staff.

INFO SAPIENS LLC 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 U.S. government authorities.

### **References**

FAR 52.222-50 – Combating Trafficking in Persons

USAID Standard Provision “Trafficking in Persons”