

Combating Trafficking in Persons Compliance Plan

Instructions: For each US Government Contract/Award, complete the information requested by the tables below, as applicable. If not applicable, mark “N/A” in the appropriate space.

Contract/Award Number	Contract 7200AA18C00074
Contract/Award Title	Medicines, Technologies, and Pharmaceutical Services (MTaPS) Program
Period of Performance:	20 September 2018 – 19 September 2023
Country of Performance:	Worldwide

REGULATORY REFERENCES: COMBATING TRAFFICKING IN PERSONS

Federal Acquisition Regulation (“FAR”) 52.222-50 (Combating Trafficking in Persons) and USAID Trafficking in Persons Standard Provision (ADS Ch. 303.M20) prohibit prime and subcontractors or subrecipients from engaging in human trafficking activities. Under these regulations, human trafficking includes: (1) participating in sex trafficking, (2) procuring commercial sex acts (even if this practice is legal in a local jurisdiction), (3) using force, fraud, deception, abuse power or a position of vulnerability, or coercion to subject a person to involuntary servitude or exploitation, (4) giving or receiving payments or benefits to a person to achieve the consent of a person having control over another person, or (5) obtaining labor from a person by threats of serious harm to that person or another person, among others. In addition to not engaging in human trafficking, these regulations require that prime awardees and subcontractors or subrecipients report to the government and investigate credible information regarding possible human trafficking violations. If the estimated value of the services to be performed outside of the United States exceeds \$500,000, awardees, subcontractors and/or subrecipients are required to implement a compliance plan that, among other things, informs the awardee’s, subcontractor’s, and/or subrecipient’s employees and agents of anti-human trafficking requirements, provides a means of reporting potential human trafficking violations, and identifies a means of monitoring subcontractors and subrecipients to facilitate compliance with anti-trafficking in persons requirements.

The compliance plan must be maintained during the performance of the award, subcontract and/or subaward and must be appropriate –

- (i) To the size and complexity of the project; and
- (ii) To the nature and scope of the activities to be performed, including the number of non-US citizens expected to be employed and the risk that project activities will involve services or supplies susceptible to trafficking persons.

COMPLIANCE PLAN

MSH has implemented the following compliance plan to prevent any prohibited activities identified in paragraph (b) FAR 52.222-50, Combating Trafficking in Persons.

Requirement from FAR 52.222-50(h)	How MSH Ensures Compliance
<p>An awareness program to inform contractor employees about the Government's policy prohibiting trafficking-related activities described in paragraph (b) of this clause, the activities prohibited, and the actions that will be taken against the employee for violations.</p>	<p>As part of the MSH Code of Business Ethics and Conduct, it is expected that each of its employees will comply with all laws, regulations, rules, and regulatory orders associated with our business. Section II i of the Code specifically addresses Combating Trafficking in Persons 48 CFR 52.222-50.</p> <p>All new personnel are required to read and acknowledge the Code at the time of hire and must also complete an online training program on the Code, including its anti-trafficking provisions. All MSH employees certify annually that they understand and will comply with the Code.</p>
<p>A process for employees to report, without fear of retaliation, activity inconsistent with 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 at 1-844-888-FREE and its email address at help@befree.org.</p>	<p>All MSH personnel, Subrecipient and Subrecipient Personnel are required to report any suspected trafficking-related activity or violation of this policy to MSH. MSH strictly prohibits retaliation against any MSH employee who reports prohibited trafficking-related activity or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal.</p> <p>Points of contact for reporting violations are part of the MSH Code of Business Ethics and Conduct are on the MSH intranet. MSH employees can make a report to a supervisor, a manager or director, the CFO, the General Counsel, any member of the Audit Committee of the Board of Directors (at auditcommittee@msh.org) or to the anonymous hotline at +1-888-418-0936 or can file a report on line at www.msh.ethicspoint.com</p> <p>Posters with the following information are posted throughout MSH offices.</p> <p>The Global Human Trafficking Hotline can be reached at 1-844-888-FREE and its email address is help@befree.org.</p>
<p>A recruitment and wage plan that only permits the use of recruitment companies with trained employees, prohibits charging recruitment fees to the employee, and ensures that wages meet applicable host-country legal requirements or explains any variance.</p>	<p>MSH complies with all federal and state laws in the US and all local labor laws in the countries in which MSH operates in its approach to recruitment and compensation. Staffs are trained in recruitment and hiring processes to ensure compliance with appropriate laws and regulations.</p>

<p>A housing plan, if the Contractor or subcontractor intends to provide or arrange housing that ensures that the housing meets host-country housing and safety standards.</p>	<p>It is MSH’s policy to provide housing allowances with which the employee arranges for his/her own housing. MSH’s Country Office Management Unit director or Business Operations Unit approves employee election to ensure it is compliance with host-country housing and safety standards.</p> <p>PROJECT: The project will provide housing allowance to eligible employees.</p>
<p>Procedures to prevent agents and subcontractors at any tier and at any dollar value from engaging in trafficking in persons (including activities in paragraph (b) of FAR 52-222-50) and to monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in such activities.</p>	<p>Before issuing any subaward to Subrecipients based outside the US MSH requires the Subrecipient to certify that they have a “Combating Trafficking in Persons” compliance plan by completing the certification regarding “Combating Trafficking in Persons”. These Subrecipients are required to re-certify that they have a “Combating Trafficking in Persons” compliance plan and the subrecipient is in compliance with the plan on an annual basis for the life of the subaward. This recertification occurs on the anniversary date of the subaward.</p> <p>PROJECT: The MSH Contract Administrator or designee will request annual certifications from subcontractors/subrecipients, and request copies of compliance plans when applicable.</p>

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