

Trafficking in Persons Compliance Plan 2023

Background and Purpose

Digital Serbia Initiative, Belgrade (“Recipient”) has developed this Trafficking in Person Compliance Plan (“Plan”) to reaffirm and implement the Recipient’s commitment to reducing trafficking person in line with Annex 2 to the Fixed Amount Award No. 72016921FA00001 for implementation of the project Venture an Idea (“Award”).

This Plan was created and amended to ensure Company’s personnel engaged in the performance of the Award as employees, consultants, volunteers, or subrecipients (the “Employees”), are aware of what kinds of conduct are prohibited under anti-trafficking in persons regulations and laws, as well as the potential consequences of such violation.

Applicability

This Plan sets out the Recipient’s minimum standards for anti-trafficking in persons compliance and applies to the Award and subawards under the Award. It is in substance also the Recipient’s policy for all Employees engaged in the performance of the Award.

The Recipient’s Trafficking in Persons Policy

The Employees must not engage in:

- (1) Trafficking in persons (as defined in the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Transnational Organized Crime) during the period of the Award;
- (2) Procurement of a commercial sex act during the period of the Award;
- (3) Use of forced labor during the period of the Award;
- (4) Acts that directly support or advance trafficking in persons, including the following acts:
 - i. Destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents;
 - ii. Failing to provide return transportation or pay for return transportation costs to an employee from a country outside the United States to the country from which the employee was recruited upon the end of employment if requested by the employee, unless:
 - a) exempted from the requirement to provide or pay for such return transportation by USAID under the Award; or
 - b) the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
 - iii. Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment;



- iv. Charging employee's recruitment fees; or
- v. Providing or arranging housing that fails to meet the host country housing and safety standards.

Employee Awareness Program

All Employees are required to read and acknowledge the Notification on Prohibitions related to Trafficking in Person prior to performing work under the Award. Violations of the Notification on Prohibitions Related to Trafficking in Person are subject to disciplinary actions prescribed by Serbian legislation. In addition, all Employees will be encouraged to visit the Department of State's Office to Monitor and Combat Trafficking of Persons website at <http://www.state.gov/j/tip/> to learn more about anti-trafficking in persons policies.

Recruitment and Wage Plan

The Recipient 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.

The Recipient prohibits charging recruitment fees to any Employee.

The Recipient will pay to all Employees wages that meet applicable legal requirements in the Republic of Serbia or will explain any variance.

Housing Plan

In situations where the Recipient provides housing to the Employees, the housing will meet the housing and safety standards of the Republic of Serbia.

Supplier Compliance

The Recipient's contractors, consultants, vendors, suppliers, subcontractors, and sub-recipients ("Suppliers") working on the implementation of the Award must agree to comply with all applicable anti-trafficking in persons provisions and provisions stated in the Notification on Prohibitions Related to Trafficking in Person.

The Recipient will insert in all Supplier contracts, subcontracts, and sub-agreements ("Supplier Contracts"), all USAID Standard Provisions, and all articles from Annex 2, Section M.15 of the Award.

The Recipient's Suppliers who provide goods or services in the amount of \$500,000 or over, that are directly charged to the US government 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 the Recipient. The Supplier's compliance plan must meet the minimum requirements of the Trafficking in Persons Provisions and be appropriate to the size and complexity of the contract, subcontract or sub-agreement with the Recipient and the nature of the activities to be performed under it.

Prior to the award of any Supplier Contract over \$500,000, and on an annual basis thereafter, all the Recipient's Suppliers must submit a certification to the Company:

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

If any Supplier fails to comply with the provisions of the Notification on Prohibitions Related to the Trafficking in Persons or any other USAID anti-trafficking in person provisions, the Recipient 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 who is in violation from a project;
- Requiring the Supplier to terminate its relationship with any Supplier contractor, consultant, supplier, subcontractor or sub-recipient, who is in violation;
- Suspending payments to Supplier until the violation is remedied;
- Immediately terminate the Supplier Contract.

Reporting Requirements and Procedure

All the Recipient Employees, Suppliers and Supplier Personnel are required to report any suspected trafficking-related activity or violation of this Plan to the Recipient or Global Human Trafficking Hotline. Reports may be made to:

- 1) Any supervisor or colleague working on the project;
- 2) Recipient's responsible person Nina Tasić, nina.tasic@dsi.rs;
- 3) The Global Human Traffic Hotline at 1-844-888-FREE or help@befree.org.

The Recipient strictly prohibits retaliation against any Employee, Supplier and Supplier Personnel who reports prohibited trafficking-related activity or other violations of this plan or Notification on Prohibitions Related to Trafficking in Persons, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. The Employee, Supplier or Supplier 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/contract with the Recipient.

Investigations

If the Recipient receives credible information from an Employee report or any other source alleging prohibited trafficking-related activity, Nina Tasić will coordinate an investigation and report its findings and determine what, if any, remedial action is appropriate.

The Recipient will be responsible for immediately notifying the cognizant Agreement Officer and the USAID Office of the Inspector General.

The Recipient will cooperate fully with any Federal agencies responsible for any audits, investigations, or corrective actions relating to trafficking in persons.



Posting

The Recipient disseminates this Plan to all Employees engaged in the performance of the Award.

Certification

Annually, after receiving the award, the Recipient will provide the Agreement Officer with certification that:

1. The Recipient has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, contractor, supplier, subcontractor or their employee or agent engaged in any prohibited activities and,
2. After completing the necessary due diligence and to the best of Recipient's knowledge and belief, neither Recipient nor any of its agents, contractors, suppliers, subcontractors or their employees or agents are engaged in prohibited human trafficking activities; or, if abuses related to any of the prohibited trafficking activities were found, the Recipient or its agent, contractor, supplier, or subcontractor has taken the appropriate remedial and referral actions.

