

RTI Anti-Trafficking Compliance Plan

References: RTI Policy 1.23 Prohibition of Human Trafficking

FAR 52.222-50 -- Combating Trafficking in Persons and 52.222-56
Certification Regarding Trafficking in Persons Compliance Plan

RTI has a culture of compliance and zero tolerance for corruption or unethical behavior. We maintain robust compliance and ethics programs that are aligned with our corporate values. Key elements of RTI's programs include written compliance standards and procedures, ongoing employee training, monitoring of compliance program effectiveness, a reporting process for complaints and concerns, corrective disciplinary actions for noncompliance, and investigation and remediation of problems.

RTI's leadership understands the importance of anti-trafficking and anti-corruption initiatives and has devoted the resources sufficient to ensure compliance. RTI has a dedicated Ethics Officer and a Risk & Compliance Officer who are fully supported by the Board of Governors and the Chief Executive Officer. The Ethics Officer and Risk & Compliance Officer assess compliance risk, including anti-trafficking risk, for RTI's Executive Leadership Team on a quarterly basis, and brief the Audit Committee of RTI's Board of Governors on a quarterly basis.

A. Risk Assessments

RTI engages a range of stakeholders to fully understand the risks faced by the organization and then tailors compliance measures to address those risks. These risk assessments include evaluations of vendors, suppliers, and recruiting agents regarding the possibility of violations of the prohibition on trafficked person or forced or child labor.

RTI's risk assessment of vendors and suppliers also includes the company's hiring practices and use of labor recruiters. Allegations or suspicions of potential violations are promptly investigated, remedied, and, if required, reported to appropriate government officials.

B. Awareness Program and Project-Specific Compliance Plans

RTI has a detailed Code of Conduct that is reviewed at least annually and updated as needed. All employees must review the Code of Conduct and acknowledge every year their understanding of the expectations to comply. The Code clearly prohibits human trafficking and serves as a guide to help RTI and our employees conduct its projects ethically and in adherence with all applicable laws. It has been translated into multiple languages and can be viewed in English here: https://www.rti.org/sites/default/files/related-content-files/codeofconduct_english_0.pdf. The obligation to adhere to the Code of Conduct extends to all project partners and stakeholders. All project implementing entities, including sub-contractors, grantees, government partners and vendors, have access to the Code on RTI's website.

In addition to the Code, RTI policies and procedures prohibit human trafficking and forced and child labor, promote child protection, and define vetting requirements for vendors relating to trafficking, corruption, and other human rights-related concerns.

Finally, in addition to the requirements of this Anti-Trafficking Compliance Program, projects identified as requiring a Combating Trafficking in Persons Compliance Plan (CTIP) create a customized plan consistent with the size and complexity of the specific project needs. The proposal team for each such identified project will ensure the requirement is addressed at the proposal stage and will consider the risk of trafficking activity in addition to appropriately designing the plan in the context of the size and complexity of the proposed project. Each CTIP emphasizes and explicitly prohibits corrupt practices of any kind related to human trafficking and forced and child labor. In accordance with RTI's Code of Conduct and corporate policies, any violation of RTI's policies concerning the prohibition of human trafficking will result in disciplinary actions including the potential termination of employment.

Upon award, each CTIP is reviewed and updated as needed on an annual basis. For each CTIP, RTI certifies annually that (1) the CTIP has been implemented to prevent any prohibited activities and monitor, detect, and terminate any agent, subcontract, or subcontractor employee engaging in prohibited activities and (2) that, after having conducted due diligence, either, to the best of RTI's knowledge and belief, no agents, subcontractors, or their agents engaged in any prohibited activities or that remedial and referral actions were taken

C. Supply Chain Due Diligence and Safeguards

RTI's Procurement Office is responsible for making RTI's anti-trafficking policies known to suppliers and recruiting agents and for flowing down the trafficking-related requirements contained in RTI's contracts with the federal government to both subcontractors and recruiting agents.

Where applicable, RTI includes the Federal Acquisition Clauses regarding Human Trafficking (FAR 52.222-50 and 52.222-56) or similar requirements from Federal assistance awards in all subcontracts and in all contracts with recruiting agents. Whenever subcontractors are required under these requirements to submit a certification, RTI shall require submission prior to the award of the subcontract and annually thereafter.

At the proposal stage, anti-trafficking and other human rights-related vetting of third parties will be completed by RTI's Subcontract Sourcing team. RTI follows the guidance in the United Nations Guiding Principles on Business and Human Rights and prioritizes for attention those suppliers with a profile presenting the most significant risks of adverse human rights impacts, whether based on the particular operations or operating context, the goods or services involved, or other factors. Based on the results of this risk assessment, certain providers may require

heightened pre-contract due diligence, as well as post-contract monitoring.

For certain projects believed to be a high risk, additional vetting of subcontracts may include requesting and reviewing subcontractor compliance plans prior to subcontract award to ensure they include adequate monitoring procedures. During contract performance, any indication that vendors or suppliers are potentially engaged in trafficking-related activities will be investigated.

Periodic audits may also be implemented for providers of goods and services that are more susceptible to trafficking and forced labor.

RTI is responsible for the compliance of our vendors and subcontractors, and any government directed payment withholding for non-compliance will be against our (prime) contract. RTI's Accounts Payable function and the Project Manager are responsible for ensuring payments are withheld for non-compliance with the prime contract.

D. Recruitment, Wage, and Housing Plans

RTI generally does not use external recruiting companies, however, in the event RTI were to use an external recruiting company, they would be subject to RTI's wage, hiring, and recruitment practices which only permit the use of recruitment companies with trained employees, prohibit charging recruitment fees to the employees or potential employees, and ensure that wages meet applicable host-country legal requirements. Any approved variances to these practices are explained in the project specific Handbook and/or CTIP.

In certain circumstances, RTI may provide its employees with a housing allowance and generally does not provide or arrange housing. If RTI were to provide or arrange housing, the CTIP will include a plan to accomplish the meeting of housing and safety standards. In the event RTI provides an employee an allowance to defray housing costs, RTI will ensure that staff sign an acknowledgement these funds will not be used in violation of anti-trafficking regulations.

E. Training

In addition to reading and acknowledging the Code of Conduct, we understand the importance of additional ethics training addressing the prohibition on human trafficking. To that end, we have a robust ethics and compliance training program that includes in-person training at our corporate offices and in the field, written training documents, and online courses.

Our training emphasizes that corruption is not limited to financial or material gain, but also extends to abuse of position, conflicts of interest, cronyism, and influence by gifts or hospitality. Performing our duties in an ethical manner and in full compliance with all applicable laws is essential at RTI and any failure to uphold these values or any violation of the Code of Conduct is serious. Our employees share our values and strive to act ethically. They also understand and are deterred by the potential of disciplinary actions, including termination and reporting to the relevant enforcement authorities that may follow from a violation.

Training specific to Anti-trafficking and Child Protection may include educating staff, contractors, and vendors on prohibited conduct, recognizing signs of trafficking and forced labor, and the available reporting mechanisms. Vendors or first-tier suppliers are required through contractual provisions to provide this training to other relevant links in their supply chains.

F. Reporting Mechanisms

RTI maintains an anonymous Ethics Helpline (919.541.7070, 877.212.7220 toll-free), which is a dedicated, confidential phone line directly to RTI's Ethics Office. The RTI Ethics Office also maintains an online reporting platform that is available in multiple languages, allows for anonymous reporting, and can be accessed at any time (<https://www.ethicssuite.com/report/rti>). In addition, the Ethics Office can also be contact through email (ethics@rti.org). The Helpline and ethics e-mail address provide a means through which RTI employees can seek advice and guidance on the RTI Code of Conduct and RTI policies and procedures, as well as a means to ensure that instances of improper conduct or other irregularities are reported, investigated, and resolved. Employees may also contact the Global Human Trafficking Hotline at 1-844-888-FREE or email at help@befree.org to report concerns regarding human trafficking.

All reports of suspected ethics violations are investigated and, if a violation is confirmed, appropriate action is taken. That action may include disciplinary action, up to and including termination of employment with RTI and disclosure to the relevant enforcement authorities.

RTI has multiple mechanisms in place that permit employees and others to report violations of the Code of Conduct or other human rights concerns safely and without retribution. RTI prohibits retaliation against an employee for reporting a suspected violation. Employees who engage in retaliatory behavior will be subject to disciplinary action, up to and including termination of employment with RTI.

It is each employee's obligation to report known or suspected violations of the Code of Conduct or RTI Policies and Procedures. If an employee fails to report a suspected violation, he or she could be subject to disciplinary action, up to and including termination of employment.

RTI will follow all legal requirements regarding the reporting of suspected trafficking or other violations of the law, including, where applicable, disclosures to contracting officers, the Office of Inspector General, or law enforcement.

Further, to foster a culture of self-reporting of potential violations of laws, requirements, and established processes, project handbooks provide detailed information regarding confidential reporting mechanisms and safeguards in place to protect against retaliation or reprisal. Access to confidential reporting mechanisms, including RTI's anonymous Ethics Helpline, is made available to all project implementing entities, including sub-contractors, grantees, government partners and vendors.

If RTI has credible information that alleges an RTI employee, subcontractor, subcontractor employee, or their agent has engaged in conduct in violation of this Program on a contract

including FAR 52.203-13, RTI will inform the Contracting Officer and Inspector General immediately. RTI will provide full cooperation to the agency Inspector General in the disclosure of information, provision of timely responses to questions and requests for documents, providing reasonable access to facilities and staff, and protection of all employees suspected of being victims or witnesses to prohibited activities.

G. Monitoring and Audits

RTI monitors vendors and suppliers and will conduct enhanced monitoring of vendors and suppliers that may be susceptible to trafficking and/or forced labor. Audits are performed based on known or suspected risk factors associated with vendors or suppliers.

RTI will fully cooperate with the government and enforcement agencies to conduct audits and investigations on anti-trafficking compliance.

H. Remediation

Where misconduct is uncovered through an internal investigation, third party audit, or otherwise, the misconduct is remedied through corrective action and preventative measures are implemented to reduce to risk of reoccurrence.

I. Transparency

RTI will cooperate with all legal requirements regarding policy transparency (including, for example, any future anti-trafficking initiatives like the California Transparency in Supply Chains Act) that call for companies to disclose their efforts to ensure that their supply chains are free of forced labor and other trafficking-related activities.