

RTI Anti-Trafficking Compliance Program

References: RTI Policy 1.23 Prohibition of Human Trafficking and RTI Procedure 1.23.1
Prohibited Acts dated 04/02/2015

FAR 52.222-50 -- Combating Trafficking in Persons (Mar 2015) and 52.222-56
Certification Regarding Trafficking in Persons Compliance Plan (Mar 2015)

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, regular audit evaluation and 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. Existing staff includes a dedicated Ethics Officer and Vice President of Compliance who is fully supported by the Board of Governors and the Chief Executive Officer and who leads RTI's Ethics and Compliance program. The Vice President of Internal Audit and the Chief Risk Officer have independent authority to execute their duties. Moreover, an Executive Compliance Committee, led by RTI's Ethics Officer and Vice President of Compliance, and comprised of members of RTI's Executive Leadership Team, meet monthly to assess Institute level and project specific compliance risks. These individuals, and many others, constantly work to ensure that corruption is avoided or quickly and efficiently identified and remedied.

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. Codes of Conduct, Policies and Procedures

RTI has a detailed Code of Conduct that all employees must review and acknowledge every year and with which they are expected 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.

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.

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 our Code of Conduct and ongoing ethics training, RTI issues a project specific Employee Handbook for each country where we operate. The Handbook will further emphasize and explicitly prohibit corrupt practices of any kind related to human trafficking, forced and child labor. Disciplinary actions for noncompliance with RTI corporate and project specific policies and procedures and the Code of Conduct will be clearly explained in the Handbook.

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 attention to 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. 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.

E. 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 Officer. The RTI ethics office also has a dedicated, ethics e-mail address (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.

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, in order 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.

F. 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.

G. 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 the risk of reoccurrence.

H. Transparency

RTI will cooperate with all legal requirements regarding policy transparency (including, for example, any future anti-trafficking initiatives similar to 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.