



**NUMARK ASSOCIATES, INC.**

COUNTERING TRAFFICKING IN PERSONS  
COMPLIANCE PLAN FOR  
TASK ORDER 72039121F00005  
POWER SECTOR IMPROVEMENT ACTIVITY  
(PSIA)

**September 9, 2024**

## **COUNTERING TRAFFICKING IN PERSONS COMPLIANCE PLAN FOR TASK ORDER 72039121F00005 USAID/PAKISTAN POWER SECTOR IMPROVEMENT ACTIVITY (PSIA)**

### **Purpose**

NUMARK Associates, Inc. (NUMARK) and the United States Government prohibit trafficking in persons. The U.S. Government's policy prohibiting trafficking in persons is available at FAR 52.222-50, Combating Trafficking in Persons (C-TIP).

NUMARK is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. NUMARK will not tolerate or condone human trafficking or slavery in any part of our global organization.

NUMARK employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom and with whom NUMARK conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

The purpose of this C-TIP Plan is to set out NUMARK's policies and procedures for: (1) making those who work on the Power Sector Improvement Activity (PSIA) Project aware of the conduct prohibited under NUMARK policy and the USG Anti-Trafficking Provisions and the actions that may be taken against employees and others for violations; (2) employing fair recruitment, wage and housing practices; and (3) preventing prohibited trafficking activity by suppliers, subcontractors, consultants; as well as monitoring, detecting and terminating those who engage in such activities.

### **Overview of Task Order 72039121F00005, USAID PSIA**

**The USAID PSIA task order has three primary objects, which are:**

- OBJECTIVE 1: INCREASE POWER SECTOR COMPETITION THROUGH SUPPORT TO DEVELOP PAKISTAN'S WHOLESALE ELECTRICITY MARKET
- OBJECTIVE 2: IMPROVE THE MANAGEMENT AND OPERATION OF THE ELECTRIC TRANSMISSION AND DISTRIBUTION SYSTEM
- OBJECTIVE 3: OPTIMIZE GRID ELECTRICITY LOAD

NUMARK's role in achieving these objectives is to provide guidance to local entities and strengthen their ability to perform and to award grants to recipients whose efforts will make the goal more achievable. Notably, none of NUMARK's scope, current projects or planned projects include any of the activities that normally attract those who traffic in persons. NUMARK is not involved in any construction, either directly or through its grant awards. NUMARK is not supporting any farming or other agricultural activities nor is it engaging in large recruitment activities. NUMARK currently employs no non-US nationals on this task order. Each individual who NUMARK or its subcontractors has hired or entered into an independent consultant contract with has had unique qualifications for the role, has been interviewed and recruited solely by NUMARK or its subcontractors, and has been hired in accordance with local laws and regulations.

## **Applicability**

This PSIA Project C-TIP Plan sets out NUMARK’s standards for anti-trafficking compliance and applies to the NUMARK PSIA Project, its employees, consultants, and subcontractors.

## **Recruitment and Wage Plan**

NUMARK and the PSIA Project prohibit the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. NUMARK and the PSIA Project shall 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 NUMARK or the project), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

NUMARK and the PSIA Project prohibit charging recruitment fees to any employee. NUMARK and the PSIA Project will pay all employees’ wages that meet applicable host-country legal requirements or will explain any variance. Where required by law or contract, NUMARK and the PSIA Project 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 of 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. If the employee must relocate to perform the work, NUMARK will provide the required work document at least five (5) days prior to relocation.

NUMARK and the PSIA Project prohibit destroying, concealing, confiscating, or otherwise denying any employee access to his or her identity or immigration documents.

NUMARK and the PSIA Project 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 NUMARK for purposes of working on a covered U.S. Government contract or award.

## **Housing Plan**

In any situation where NUMARK and the PSIA Project provides housing to employees, the housing will meet host country housing and safety standards.

## **Supplier Compliance**

All NUMARK and PSIA Project contractors, consultants, and subcontractors (collectively referred to as “Suppliers”) must agree to comply with the Policy and all applicable Anti-Trafficking Provisions. NUMARK and the PSIA Project will include language to that effect in all Supplier contracts and subcontracts including inserting FAR 52.222-50 and FAR 52.222-56 where applicable.

Subcontractor C-TIP compliance plans must meet the minimum requirements in the FAR Anti-Trafficking clause and be appropriate to the size and complexity of the subcontract with NUMARK and the PSIA Project and the nature of the activities to be performed under it.

As applicable, and prior to the award of any subcontract, and on an annual basis thereafter, all NUMARK PSIA Project subcontractors must submit a certification to NUMARK:

- That the subcontractor has implemented a C-TIP compliance plan; and
- That after conducting due diligence, to the best of the subcontractor's knowledge and belief, neither it nor any of its employees, or its contractors, consultants, suppliers, subcontractors, or their employees, have engaged in any prohibited trafficking-related activities, or if any abuses relating to prohibited trafficking-related activities have been found, subcontractor has taken appropriate remedial and referral actions.

For subcontractors and subcontracts that may be more susceptible to trafficking-related activities, NUMARK and the PSIA Project may, in situations where it has direct access, inspect the subcontractor's workplace or any housing provided by the subcontractor for signs of trafficking-related activities. In lower-risk situations, and in situations where the subcontractor is distant, NUMARK and the PSIA Project will review the plans and certifications of its subcontractors to ensure they include adequate monitoring procedures and reporting mechanisms. If any subcontractor fails to comply with the Policy or applicable Anti-Trafficking Provisions, NUMARK and the PSIA Project will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

- Requiring the subcontractor to remove an employee or agent from a project
- Requiring the subcontractor to terminate its relationship with any contractor, consultant, or subcontractor
- Suspending payments to subcontractor until the violation is remedied
- Immediately terminating the subcontract

### **Reporting Requirements and Procedure**

NUMARK's management is committed to making its employees and subcontractors aware of the prohibition on trafficking in persons as defined herein. Each employee assigned to support Task Order 72039121F00005 USAID/PSIA must review this policy and acknowledge that they have reviewed, understood and will comply with it. Furthermore, the requirements contained herein are part of all subcontracts and independent consultants' contracts, and both subcontractors and independent consultants are required to provide NUMARK with annual certifications of their compliance with the policy or explanations of and corrective actions taken to address any noncompliances. If subcontractors or independent consultants are found to have potentially been involved in human trafficking, their actions will be promptly reported in accordance with NUMARK's process defined herein and their contracts are subject to immediate termination as a result of such a finding.

NUMARK employees must report any conduct that they believe to be a violation of this policy to NUMARK's legal or human resources department. NUMARK's legal or human resources department will follow the government's reporting requirements immediately. No one should conduct an internal investigation in advance of such reporting. In addition to reporting suspected violations to NUMARK's legal or human resources department contacts, NUMARK employees may report this information to the hotline phone number of the Global Human Trafficking Hotline at 1-844-888-FREE or to its email address at [help@befree.org](mailto:help@befree.org). Upon receiving a report regarding the suspicion that human trafficking has occurred or is occurring, NUMARK's legal or human

resources department representative will notify the Global Human Trafficking Hotline in advance of initiating any internal investigation.

Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy. Additionally, NUMARK management overseeing subcontractor and independent contractor performance under this task order are accountable for (1) tracking receipt of subcontractors and independent consultants' annual certifications of compliance with the prohibitions on trafficking in persons; (2) assessing work scopes assigned to those companies or individuals for the potential for trafficking in persons to arise and providing additional oversight of that work when such a potential is identified; and (3) continually observing and evaluating the conduct of and work force provided by those companies and independent consultants for indices of human trafficking and immediately reporting any suspect conduct in accordance with this policy.

NUMARK and the PSIA Project strictly prohibit retaliation against any employee who reports prohibited trafficking-related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. NUMARK and PSIA Project 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 with NUMARK.

### **Posting**

NUMARK will post this Plan on its external website. NUMARK will also post information regarding this C-TIP Plan and how to report any suspected trafficking activity at all workplaces, except where the work is being performed in the field or not otherwise at a fixed location.