

**NATIONAL ACADEMY OF SCIENCES OF UKRAINE
GENERAL ENERGY INSTITUTE
(GEI of the NAS of Ukraine)**

APPROVE

Director of the GEI of the NAS of
Ukraine

Academician of the NAS of Ukraine



**COMPLIANCE PLAN
for Preventing Prohibited Activities under FAR 52.222-50
(Combating Trafficking in Persons)
of the General Energy Institute of the National Academy of Sciences of Ukraine**

Reviewed and approved by the Academic Council of the GEI of the NAS of Ukraine,
protocol № 2, 2026/02/12

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1. Purpose and Scope

This Compliance Plan establishes measures to prevent, detect, and respond to prohibited activities related to trafficking in persons, forced labor, and exploitation under FAR 52.222-50.

It applies to:

- all employees;
- project and contract personnel;
- contractors and partners.

2. Prohibited Activities

The Institute strictly prohibits:

- any form of human trafficking;
- forced or child labor;
- procurement of commercial sex acts;
- confiscation of identity documents;
- fraudulent recruitment practices;
- charging recruitment fees;
- provision of unsafe housing;
- violations of labor laws.

3. Due Diligence System

The Institute ensures:

- screening of counterparties;
- inclusion of compliance clauses in contracts;
- risk assessment in international projects;
- supply chain risk review where applicable.

4. Training and Awareness

The Institute provides:

- regular staff training;
- awareness on trafficking risks;
- communication of the Code of Ethics;
- bilingual access to materials.

5. Reporting Mechanisms

Includes:

- confidential reporting channels;
- anonymous reporting options;
- obligation to report violations;
- investigation procedures.

6. Protection of Whistleblowers and Victims

The Institute ensures:

- non-retaliation;
- confidentiality;
- victim support;
- cooperation with authorities.

7. Internal Control and Monitoring

Includes:

- periodic audits;
- risk assessment;
- updates of procedures;
- monitoring contract compliance.

8. Accountability

Violations may result in:

- disciplinary action;
- contract termination;
- reporting to authorities.