



## → ICF Statement and Plan on Human Trafficking and Modern Slavery

### Introduction and Purpose

ICF International, Inc., its subsidiaries, and affiliates (“ICF” or “Company”) developed this statement and compliance plan to support efforts against trafficking in persons (“human trafficking” or “modern slavery”) and all forms of forced labor, in both the public and private sector. This statement and plan support ICF’s Code of Business Ethics & Conduct, ICF’s Supplier Code of Conduct, and ICF’s core values to protect human dignity and follow applicable laws in our all-global business practices.

The purpose of this statement and plan is also to ensure that all ICF employees, consultants, and subcontractors, as well as ICF partners and clients, are aware of prohibited conduct as it relates to human trafficking and modern slavery. This statement and plan seek to align with particular laws of the United States, including the requirements of U.S. Federal Acquisition Regulation (Subpart 22.17, 52.222-50), laws of the United Kingdom’s UK Modern Slavery Act, and other applicable national and state (including California) legislation where ICF operates.

This published statement and plan sets out the steps that ICF takes during each year to safeguard against slavery and human trafficking taking place involving ICF projects or contracts.

Thank you for your attention to this important matter.

Sincerely,

John Wasson

President and Chief Executive Officer (CEO)

ICF International, Inc. (US)

Director

ICF Consulting Limited (UK)

ICF Consulting Services, Ltd (UK)

Last Reviewed: September 2023

## 1. Statement

As stated in [ICF's Code of Business Ethics & Conduct and the ICF Supplier Code of Conduct](#), ICF has a zero tolerance policy regarding employees, consultants, subcontractors, or vendors who engage in or support the trafficking in persons, the use of forced labor, child labor, or the procurement of any sex act where anything of value is given or received in exchange.

Human trafficking and modern slavery include many variations, including supporting forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or involuntary servitude, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. It also includes sex trafficking which means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act, along with other forms of trafficking including involving persons under 18 years of age.

ICF employees, subcontractors, and consultants performing work for ICF must not:

- Engage in “severe forms of trafficking in persons”<sup>1</sup> or “slavery, servitude, and forced or compulsory labour” as detailed above<sup>2</sup>;
- Procure commercial sex acts; or
- Use forced labor in the performance of any ICF work or contract, including work for the U.S. Government;
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employees’ identity or immigration documents, such as passports or drivers’ licenses, regarding of issuing authority;
- Use misleading or fraudulent practices during the recruitment of employees, such as failing to disclose, in an accessible format and language, basic information or making material misrepresentations regarding the key terms and conditions of employment, including wages, benefits, location, the living conditions, hazardous work, housing (if ICF provided or arranged), or any significant cost to be charged to the employee;
- Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charge employees recruitment fees;
- Fail to provide return transportation or pay for the cost of return transportation upon the end of employment where applicable and required when employees or subcontractors are recruited from a different country;
- Provide or arrange housing that fails to meet the host country housing and safety standards;
- Where required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands.

<sup>1</sup> Defined in 22 USC § 7102(11), and FAR 52.222-50 Combating Trafficking in Persons

<sup>2</sup> Defined in the U.K. Modern Slavery Act 2015, Part 1, Section 1

## 2. Applicability

This statement regarding human trafficking, as well as associated ICF policies and procedures, applies to all ICF employees, subcontractors, and consultants.

## 3. Disciplinary Action

Each employee, subcontractor, or consultant is responsible for ensuring their compliance with ICF policies and procedures, including those on human trafficking. Violations could result in disciplinary action, up to, and including, removal from a project, reduction in benefits, termination of employment or the subcontract agreement, and would leave the employees subject to applicable law enforcement.

## 4. Anti-Human Trafficking Compliance Plan

ICF's general plan relating to human trafficking and modern slavery includes the following elements:

### 4.1. Tailoring of Plan

ICF's compliance plan, the accompanying procedures, and its implementation may be tailored with respect to the size and complexity of the particular contract or project, along with the nature and scope of the activities to be performed, whether private or public sector work. This includes the number of individuals away from their home country expected to be employed and the risk that the work will involve services and locations susceptible to human trafficking.

### 4.2. Procedures

ICF maintains policies and internal procedures to ensure compliance with applicable elements of this Statement and Plan.

### 4.3. Awareness

Prohibition of human trafficking is an element of ICF's Code of Business Ethics and Conduct. All employees are required to read and certify compliance to ICF's Code of Business Ethics and Conduct, and are trained on it at-hire and annually. Subcontractors and Consultants are also required comply with the principles of ICF's Code of Business Ethics and Conduct, as well as ICF's prohibition of human trafficking. Where applicable to the line of business, ICF employees receive specific training regarding human trafficking and related topics.

This statement and plan is posted internally and accessible to all ICF employees through ICF's internal Intranet. ICF may use other means to raise employee awareness through use of internal communications, travel alerts, and other internal resources.

### 4.4. Subcontracting and Consulting Agreements

In agreements with all ICF subcontractors and consultants, ICF maintains terms and conditions prohibiting the human trafficking, modern slavery, or the use of forced labor of any kind.

Where applicable, ICF will flows down the requirements of the U.S. Government (FAR § 52.222-50) to all subcontractors working on U.S. Government contracts. Additionally, where applicable, ICF will required its subcontractors to submit their own certifications prior to the award of the subcontract and annually thereafter.

## 4.5. Recruitment

ICF maintains a recruitment and wage plan that ensures that wages meet host country legal requirements;

## 4.6. Supply Chain and Vendors

As a business consulting company, ICF does not have a traditional supply chain involving the creation of a goods or services from a set of suppliers which we then deliver to customers, nor do we manufacture or produce or utilize goods or commodities in our lines of business involving the use of manual or factory labor.

## 5. Reporting Violations

### 5.1. No Retaliation

Report any honest and sincere concerns about violation of this policy. ICF strictly prohibits retaliation against employees who report or assist in reporting what they believe in good faith to be a violation of ICF policy or Code of Business Ethics and Conduct. A “good faith” report means you have accurately provided all relevant information and your report is sincere. Retaliation against an employee’s good faith report will result in disciplinary action, up to and including termination of the retaliating employee(s). Speak up when you see or suspect illegal or unethical conduct. This is both your right and your responsibility.

### 5.2. Report Violations

For any activity that is a violation ICF policies, procedures, or of any human trafficking law applicable to ICF’s business, reports may be made through the following channels:

[ComplianceCommittee@icf.com](mailto:ComplianceCommittee@icf.com) or

ICF International, Inc.

9300 Lee Highway Fairfax, VA 22031

Attention: Chief Ethics & Compliance Officer

---

For employees or subcontractors who wish to remain anonymous, you may make your reports to ICF’s Hotline:

+1.866.373-6934 (U.S.) or

+1.844.641.5874 (Outside the U.S.) or

+0800 89 0011 (U.K.) wait for the prompt, then 866.373.6934 or

<https://icf.ethicspoint.com>

Employees or subcontractors aware of potential human trafficking violations may also contact the U.S. State Department’s Global Human Trafficking Hotline directly at:

1-844-888-FREE or [help@befree.org](mailto:help@befree.org)

If you report a potential violation, be aware that (1) ICF will take steps in reviewing the suspected violation to keep such report confidential, but (2) the need to investigate and correct any impropriety may require disclosure of the matter reported.



---

[icf.com](https://www.icf.com)

 [linkedin.com/company/icf-international/](https://www.linkedin.com/company/icf-international/)

 [twitter.com/icf](https://twitter.com/icf)

 <https://www.facebook.com/ThisIsICF/>

---

## About ICF

ICF (NASDAQ:ICFI) is a global consulting and digital services company with over 8,000 full- and part-time employees, but we are not your typical consultants. At ICF, business analysts and policy specialists work together with digital strategists, data scientists and creatives. We combine unmatched industry expertise with cutting-edge engagement capabilities to help organizations solve their most complex challenges. Since 1969, public and private sector clients have worked with ICF to navigate change and shape the future. Learn more at [icf.com](https://www.icf.com).