

WEConnect International Policy on Debarment and Suspension

December 15, 2020

1. PURPOSE OF POLICY ON DEBARMENT AND SUSPENSION

The policy set forth in this document establishes guidelines to ensure WEConnect International does not conduct business with persons that are debarred or suspended in accordance with 2 CFR Part 180 as well as individuals, groups or entities, such as terrorists and narcotics traffickers in accordance with Executive Order 13224.

2. DEFINITIONS

Suspension – A disqualification from government contracting and subcontracting for a temporary period of time because an entity or individual is suspected of engaging in criminal, fraudulent, or seriously improper conduct.

Debarment – An exclusion from government contracting and subcontracting for a reasonable, specified period of time because of civil judgments or fact-based cases involving environmental crimes, contract fraud, embezzlement, theft, forgery, bribery, poor performance, non-performance or false statements as well as other cause.

Terrorism – the use of intentionally indiscriminate violence as a means to create terror among masses of people; or fear to achieve a religious or political aim.

Terrorist financing – the process by which terrorists fund their operations in order to perform terrorist acts.

3. SCOPE

This policy applies to Board members, all employees, suppliers, recipients, subrecipients and contractors, at any tier, or their employees, labor recruiters, brokers and other agents. This policy applies to procurements regardless of the amount of the award.

4. RESPONSIBLE PARTIES FOR THE POLICY

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

5. GUIDELINES

Entities and personnel doing business with WEConnect International should not be:

- a. Presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from receiving funds by any federal department or agency;

- b. Convicted (in the past three years) of or had a civil judgment rendered against him or her for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) transaction, contract, or subcontract under a public transaction; for violation of federal or state antitrust statutes; or for commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property; or
- c. Terminated for cause or default, within the last three-year period from federal, state or local entities.

The organization will not engage in transactions with, or provide resources or support to, individuals or organizations associated with terrorism. This policy applies to all subawards and contracts issued.

6. PROCEDURE

All employees responsible for the supplier due diligence must verify that the entity is not suspended or debarred or otherwise excluded from U.S. Federal Government contracting before issuing a contract. This verification may be accomplished by checking the *System for Award Management (SAM)* at www.sam.gov. Alternatively, the entity can provide a certification that verifies that the entity and its principals are not suspended or debarred. Contracts for sub-grantees receiving Federal Grants will include provisions to comply with this policy.

In the event that the entity becomes debarred or suspended by a Federal Agency after the receipt of an award, WEConnect International will notify (within 30 days) the associated U.S. Federal Agency Contracting Officer and will not renew the contract with the debarred or suspended entity.

In addition, as part of supplier due diligence, the employee must verify that the entity is not identified as a terrorist or narcotics trafficker in accordance with U.S. Executive Order 13224 by checking that the names of individuals or entities with whom it plans to do business do not appear on the Specially Designated Nationals and Blocked Persons List maintained by the U.S. Treasury online at: <http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx> or the United Nations Security designation list online at http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml

For any Grants with Australia' Department of Foreign Affairs and Trade (DFAT), WEConnect International will ensure that individuals or organizations involved in implementing the activity, including itself and its personnel:

- a) are not directly or indirectly engaged in, preparing, planning, assisting in or

- fostering the doing of a terrorist act;
- b) are not, and do not become listed on the 'List of Terrorist Organizations' made under the Criminal Code Act 1995 (Cth) and related regulations, posted at [Listed terrorist organisations | Australian National Security](#);
 - c) are not, and do not become listed on the 'Sanctions List' made under the Charter of the United Nations Act 1945 (Cth) and the Autonomous Sanctions Act 2011 (Cth), and related legislation, posted at [Consolidated List | DFAT](#)
 - d) are not, and do not become listed on and the World Bank's "Listing of Ineligible Firms and Individuals" posted at [Procurement - World Bank Listing of Ineligible Firms and Individuals](#);
 - e) are not acting on behalf of, or at the direction of, individuals, persons, entities or organizations listed on the Lists referred to in subparagraphs (b) to (d);
 - f) are not owned or controlled by individuals, persons, entities or organizations mentioned in subparagraphs (b) to (d); and
 - g) do not to provide direct or indirect support, resources or assets (including the Grant) to individuals, persons, entities or organizations associated with terrorism or mentioned in subparagraphs (b) to (d).

WEConnect International will inform DFAT immediately if it discovers that it or an individual or organization involved in implementing the Activity has or may have contravened this clause.

7. EXCEPTIONS

None