

ANTI-HUMAN TRAFFICKING POLICY



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Accountable Department	Operations		
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I. PURPOSE

The purpose of this policy is to ensure employees, agents, consultants, sub-recipients, subcontractors, and suppliers are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations.

Furthermore the purpose of this document is to set out mothers2mothers (m2m) policies and procedures for:

- Making m2m employees aware of the conduct prohibited under the m2m policy, the U.S. Government's Trafficking In Persons Standard Provision and the actions that may be taken against employees for violations.
- Drawing attention to m2m's recruitment and remuneration policy to ensure fair processes aligned to local markets.
- Preventing prohibited human trafficking activity by employees, agents, consultants, sub-recipients, subcontractors, and suppliers, and monitoring, detecting, and terminating those who engage in such activities.

II. SCOPE

This policy applies to all m2m employees. In this policy the word "employees" includes temporary and contract employees. The policy also includes m2m Board Members, agents, consultants, suppliers, contractors, subcontractors, sub-recipients, fellows, interns, volunteers, and representatives of partner agencies who have a formal relationship with m2m.

III. DEFINITIONS

- A. **Trafficking in Persons:** shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, or servitude or the removal of organs.
- B. **Commercial Sex Act:** any sex act on account of which anything of value is given to or received by any person.
- C. **Coercion:** means (1) threats of serious harm to or physical restraint against any person; (2) any scheme, plan or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or (3) the abuse or threatened abuse of the legal process.
- D. **Sex Trafficking:** the recruitment, harbouring, transportation, provision or obtaining of a person for the purpose of a commercial sex act.

- E. **Forced Labour:** refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers to immigration authorities, etc.
- F. **Bonded Labour or Debt Bondage:** is a person's pledge of labour or services as security for the repayment of a debt or other obligation. The services required to repay the debt may be undefined, and the services' duration may be undefined.
- G. **Involuntary Servitude:** includes a condition of servitude induced by means of (1) any scheme, plan or pattern intended to cause a person to believe that, if the person did not enter into or continue in such condition, that person or another person would suffer serious harm or physical restraint; or (2) the abuse or threatened abuse of the legal process.

IV. POLICY STATEMENTS

m2m has a zero tolerance policy prohibiting traffic in persons. This includes, but is not limited to the following trafficking-related activities:

- Engaging in any form of Trafficking in Persons.
- Engaging in Commercial Sex Acts.
- Using Forced Labour of any kind for any reason.

V. COMPLIANCE PLAN

This Compliance Plan has been developed in accordance with the USAID Standard Provision for Non-U.S. Nongovernmental Organisations M15 Trafficking in Persons (2016). This Anti-Human Trafficking policy has been summarised in the m2m Code of Ethics and Conduct policy.

A. Employee Awareness Program

m2m will ensure that employees are aware of the Anti-Human Trafficking policy by:

1. Ensuring that all new and current m2m employees read and acknowledge this policy.
2. Conducting training and awareness workshops.
3. Posting the useful and relevant contents of the Anti-Human Trafficking Compliance plan and/or related materials on its website and at the workplace.
4. Posting the Anti-Human Trafficking and Code of Ethics and Conduct policies on its SharePoint Internal Team Site where m2m employees can access it at any time.
5. Notifying all employees of the new policy via an organisation-wide email containing a link to the SharePoint Internal Team Site with instructions to access and read the policy.
6. Requiring all new employees to read and acknowledge the policy at the time of on-boarding.

B. Recruitment and Wage Plan

1. m2m will not engage in any form of fraudulent recruitment practices during the recruitment of employees or offering of employment to employees.
2. m2m will issue all employees with employment contracts that clearly indicate their terms and conditions of employment in English. Where the country's first language is not English, m2m will endeavour to issue contracts that comply with the country's first language, as needed and necessary.
3. m2m will not charge any recruitment fee to any candidate.
4. m2m will pay all employees' salaries in line with the in-country statutory requirements and m2m's remuneration policy, or will explain any variance.
5. m2m shall not destroy, conceal, confiscate, or otherwise deny any employee access to his or her identity or immigration documents.
6. In cases where an employee needs to relocate for work with m2m, m2m will offer a once off relocation allowance in line with the m2m Relocation Policy.
7. m2m will pay the contractually agreed return transportation costs for certain employees who have finished employment outside that employee's nation of residence.
8. If the employee must relocate to perform the work, m2m shall provide proof of employment or a similar work document in writing at least five (5) days prior to the employee departing from his or her country of origin.

C. Housing Plan

In situations where m2m provides an employee with temporary housing, m2m shall ensure that the housing meets the housing and safety standards of the country where the employee is located.

D. Supplier Compliance

All m2m consultants, vendors, suppliers, subcontractors and sub-recipients (hereafter referred to as Suppliers) must agree to comply with the policy and all applicable Anti-Trafficking provisions. All m2m Suppliers must have a compliance plan to prevent trafficking in persons and to monitor, detect and terminate any agents, sub-recipients or subcontractors that have engaged in such activities. The Supplier's compliance plan must meet the minimum requirements in USAID's Anti-Trafficking Standard Provision and be appropriate to the size and complexity of the subcontract or sub-agreement with m2m and the nature of the activities to be performed under it.

If any Supplier fails to comply with the policy or applicable Anti-Trafficking provisions, m2m will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

1. Requiring Suppliers to remove an employee or agent from a project.
2. Requiring Suppliers to terminate their relationship with any Supplier consultant, subcontractor or sub-recipient.
3. Suspending payments to Suppliers until violation is remedied.
4. Immediately terminating the Supplier's contract.

VI. HOW TO REPORT HUMAN TRAFFICKING

Any m2m employees or third party doing work on behalf of m2m is required to report information or knowledge of actual or potential human trafficking violations in writing as follows:

- To the m2m Human Resource Director or Country Director;
- The m2m whistle-blower e-mail address at whistleblower@m2m.org; and/or
- The Global Human Trafficking Hotline at 1-844-888-FREE or e-mail help@befree.org.

VII. ROLES & RESPONSIBILITIES

- A. Chief Operations Officer (COO): ensures policy is shared with all relevant offices and that all offices communicate these requirements to employees, agents, consultants, sub-recipients, subcontractors, and suppliers.
- B. Project Director: completes and files the required annual certification with the relevant Agreement/Contracting Officer or contractual point of contact on record, with authorization from the necessary signatories at m2m's Head Office.
- C. All m2m employees (as defined in this policy): adhere to policy and raise any concerns around trafficking.
- D. Country Directors and Human Resource Director: must be informed of any issues relating to child protection and/or human trafficking.

If the estimated value of services required to be performed under a U.S. Government award exceeds \$500,000, the Project Director must submit to the Agreement Officer, the annual "Certification regarding Trafficking in Persons, Implementing Title XVII of the National Defense Authorization Act for Fiscal Year 2013" as required prior to the award, and a copy of the compliance plan upon request.

VIII. INVESTIGATIONS

The Human Resource Department will conduct investigations. The COO or designee will make all required notifications to all relevant Funders. m2m will cooperate fully with any U.S. Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to m2m facilities and staff.

m2m prohibits retaliation against any employee who reports any violation of this policy or who cooperates with any investigation of such reports. Employees who engage in any retaliation or other violation will be subject to corrective action up to and including termination of employment and reporting to local authorities as appropriate. If any supplier or supplier employees engages in any prohibited activities, fails to report suspicious activities, or engages in retaliatory actions will be subject to action including termination of the business relationship and reporting as appropriate.

IX. CONSEQUENCES

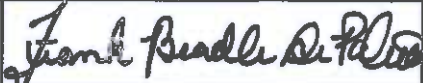
m2m personnel who engage in any of the prohibited activities listed in this policy, fail to comply with any applicable compliance plan, fail to report suspected trafficking-related activity or forward a report of suspected trafficking-related activity, or otherwise violate this policy will be subject to disciplinary action, up to and including immediate termination of employment.

If any Supplier or Supplier personnel engage in any of the prohibited activities listed in this policy, fails to comply with any applicable contractual language or compliance plan, fails to report suspected trafficking-related activity, or otherwise violates this policy, m2m will take corrective action, up to and including immediate termination of any Supplier contract or agreement with m2m.

Policy Version Change Table

Version	Page(s)	Details of changes made
1	2	Updated the definition of Trafficking in Persons in line with the Protocol To Prevent, Suppress and Punish Trafficking In Persons, Especially Women And Children, Supplementing The United NATIONS Convention Against Transnational Organised Crime (UN 2000); "
1	2	Inserted a definition of "coercion
1	5	Inserted the Compliance Plan
1	6	Included contact information for the Global Human Trafficking Hotline and m2m whistle-blower e-mail address

Approved and Reviewed by:

Name	Title/Department	Signature	Date
Frank Beadle de Palomo	Chief Executive Officer		27 August 2018

Related Policies/Procedures	Code of Ethics and Conduct Policy
Sources	<p>Standard Provision for Non-US Governmental Organizations, M15 "Trafficking in Persons (April 2016)";</p> <p>Protocol To Prevent, Suppress and Punish Trafficking In Persons, Especially Women And Children, Supplementing The United NATIONS Convention Against Transnationalorganised Crime (UN 2000);</p> <p>Trafficking Victims Protection Act of 2000</p>

