

## Human Trafficking Policy

### **Background:**

ICRW has adopted a zero-tolerance policy for human trafficking with respect to the U.S. Government zero tolerance policy as described in the FAR 52.222-50, Combating Trafficking in Persons and in USAID Standard Provision M20 for U.S. Nongovernmental Organizations (“Anti-Trafficking Provisions”).

### **Applicability:**

This Policy applies to all ICRW employees working on U.S. Government contracts and those who work with U.S. Government contracts such as ICRW contractors, consultants, suppliers, subcontractors, subrecipients, and their employees and agents.

### **Policy:**

Statement of Policy: ICRW strictly prohibits its employees and all subcontractors and agents from:

- engaging in all forms of trafficking in persons;
- procuring commercial sex acts;
- using trafficked labor;
- destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent

provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;

- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- charging employees recruitment fees (as defined by the FAR); failing to pay return transportation costs upon the end of employment, for certain employees who are not nationals of the country in which the work is taking place (with some exceptions as specified under FAR 52.222.50(b)(7));
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document in writing in a language the employee understands, containing a detailed description of the terms and conditions of employment, at least five days before an employee relocates to perform work.

### **Compliance Plan:**

ICRW will maintain a written anti-trafficking compliance plan for all U.S. Government contracts and subcontracts with an estimated value in excess of \$500,000 that are for supplies to be acquired or services to be performed outside the U.S., and for all USAID awards and subawards that exceed an estimated value of \$500,000 (“Covered Agreements”)

### **Reporting Violations:**

ICRW employees and agents may report without fear of retaliation any activity that violates this anti-trafficking policy to ICRW’s Integrity Hotline at (833) 480-0010, [www.lighthouse-services.com/icrw](http://www.lighthouse-services.com/icrw) and [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (identify ICRW in email) or Human Resources at [HR@icrw.org](mailto:HR@icrw.org) or the Global Human Trafficking Hotline at 1-844-888-FREE and email at [help@befree.org](mailto:help@befree.org)

### **Consequences of Violations:**

ICRW employees, suppliers, contractors, consultants, subcontractors, subrecipients and their employees and agents who engage in any of the prohibited activities listed in this policy, fail to comply with the policy or fail to report suspected trafficking activities may be subject to disciplinary actions up to and including termination of employment or contract.

**Additional Information:**

Information can be found on the Department of State's Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip/>. For more information on your responsibilities under this policy please see the ICRW Compliance Plan listed on our website or contact Gozde Medina, Senior HR Manager at 202-742-1228 or Patricia Daunas, Chief Operations Officer at 202-742-1266.