

FHI 360's 2022 Anti-Human Trafficking and Modern-Day Slavery Statement

1. Introduction

FHI 360 is committed to promoting a culture of safety and respect for everyone who interacts with its organization and programs. The company has implemented systems to prevent FHI 360 personnel, suppliers (including subcontractors, subrecipients, consultants, and vendors), and supplier personnel from engaging in harmful behaviors, including sexual exploitation, harassment, and other forms of abuse, such as modern slavery or trafficking in persons. It also has systems in place to respond if such activity does occur.

2. FHI 360's Structure and Business

FHI 360 is a nonprofit human development company headquartered in Durham, NC, with other US offices in Washington, DC; New York, NY; and Atlanta, GA. Its staff of 4,000 professionals works in more than 60 countries to improve the health and well-being of people around the world. FHI 360 partners with governments, private sector companies, and civil society organizations to bring about positive social change and to provide quality health services, education programs, and opportunities for meaningful economic participation. FHI 360 uses research and evidence to design and deliver innovative programs that change behaviors, increase access to services, and improve lives.

FHI 360 is led by an executive management team under the supervision of its Board of Directors. The company's Chief Compliance Officer oversees the Office of Compliance and Internal Audit (OCIA), which is responsible for investigating and resolving ethical and compliance issues. The Chief Compliance Officer is a member of the executive management team but also reports directly to the Board of Directors to ensure OCIA's independence.

3. FHI 360's Policies and Reporting Procedures

FHI 360 does not tolerate any form of trafficking in persons or other abuse in its work or its supply chains. Its [safeguarding policies](#) apply to all FHI 360 board members, employees, volunteers, consultants, vendors, contractors, subcontractors, and subrecipients. Among these policies are the following:

- Code of Ethics and Conduct
- Combating Trafficking in Persons Policy
- Protecting Program Participants from Sexual Exploitation and Abuse
- Safeguarding of Children

FHI 360's policy on Combating Trafficking in Persons (CTIP) prohibits all FHI 360 personnel, suppliers, and supplier personnel from engaging in any trafficking-related activity. The policy aligns with international and U.S. and U.K. government standards that aim to prevent modern slavery and trafficking in persons, especially among vulnerable populations, including relevant standards outlined in the United Nations Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children ("The Palermo Protocol"); the U.K. Modern Slavery Act 2015; and the U.S. government's laws, regulations and policies prohibiting trafficking in persons by government contractors and award recipients.

The CTIP policy requires FHI 360 personnel and supplier personnel to promptly report any known or suspected trafficking-related activity. FHI 360 provides multiple reporting channels in order to encourage and facilitate prompt reporting, including via email at compliance@fhi360.org, its anonymous reporting website (<http://www.fhi360.org/anonreportregistry>), and its Ethics and Compliance Hotline (1-800-461-9330 in the U.S., +1-720-514-4400 outside the U.S., plus the country-specific hotline numbers listed on the reporting website). FHI 360 personnel can also report concerns to supervisors, HR representatives, or HR management. All reports must be escalated to OCIA for investigation and corrective action.

FHI 360 strictly prohibits retaliation against FHI 360 personnel, supplier personnel, or program participants who report prohibited trafficking-related activity or other violations of FHI 360's CTIP Policy, or who cooperate with any internal or government investigations of such reports. No program participant or community member will be denied participation in a program or access to aid for reporting suspected or known trafficking-related activity or participating in an investigation.

FHI 360 personnel, suppliers, and supplier personnel who engage in prohibited conduct are subject to disciplinary action, up to and including immediate termination of employment or other relationship with FHI 360. In addition, FHI 360 may take legal action when required against FHI 360 personnel who have been found to commit trafficking-related violations, including referral to the relevant authorities for criminal prosecution or other appropriate action.

4. Due Diligence

As part of FHI 360's commitment to identify and mitigate potential trafficking-related risks in its organizational and supplier operations, FHI 360 implements the following due diligence measures:

- FHI 360 requires downstream suppliers to prohibit and take steps to prevent trafficking-related activities by their personnel, report suspected or known policy violations to FHI 360, and cooperate with any investigations or corrective actions.
- FHI 360 implements a vetting procedure for all job candidates, including conducting reference and background checks to identify and avoid the hiring of known offenders.
- Where FHI 360 suspects or learns that a supplier is involved in human trafficking or other prohibited conduct per FHI 360's policies, FHI 360 investigates and takes corrective actions, which may include termination of the supplier's relationship with FHI 360.
- All FHI 360 subcontracts, sub-agreements, purchase orders, and consulting agreements include anti-trafficking prohibitions and requirements.
- To ensure due diligence and uniform application of FHI 360's CTIP Policy, FHI 360 has developed a Universal Anti-Trafficking Compliance Plan ("[Universal Plan](#)"), which outlines the key elements of FHI 360's CTIP Policy and aligns with U.S. and U.K. Government regulations and international standards related to anti-trafficking. All FHI 360 country and project offices must implement the requirements set out in FHI 360's Universal Plan. Projects that are larger, more complex, or involve a greater risk of trafficking activity are required to implement additional measures to ensure that anti-trafficking compliance plans are appropriate to the size and complexity of the project, and the nature and scope of the activities to be performed; these additional measures are documented in a Supplemental Plan for High-Risk Projects and included in the project's anti-trafficking compliance plan (if applicable).
- Where funder requirements apply, FHI 360's suppliers are required to maintain their own written anti-trafficking compliance plans and submit pre-award and/or annual certifications that indicate that to the best of their knowledge, their employees have not engaged in trafficking in persons and if their personnel have engaged in trafficking in persons, the supplier took appropriate corrective actions.
- FHI 360's CTIP policy is posted on FHI 360's intranet and external website, where it can be accessed by all FHI 360 personnel and suppliers at any time. The Policy is also reflected in FHI 360's Code of Ethics and Conduct (the "[Code](#)"), which is posted internally and can be accessed by all FHI 360 personnel at any time. Both the Policy and the Code are available in English, Arabic, French, Portuguese, and Spanish. A verbal explanation of the contents is given upon request to individuals unable to read the printed information.

5. Assessing and Managing Risk

FHI 360's Safeguarding Framework includes a set of minimum standards (required actions) that are organized under eight domains:

1. Risk assessment and action planning
2. Safe recruitment and hiring
3. Safeguarding focal points
4. Safeguarding networks
5. Partner agreements and monitoring
6. Training and capacity building
7. Complaints and reporting mechanisms

The minimum standards under each of the eight domains above are designed to help country offices and project teams ensure uniform application of FHI 360's safeguarding policies. When effectively and fully implemented, the minimum standards mitigate risks related to exploitation and other abuse, including trafficking in persons.

In addition, staff working on FHI 360 projects that involve interaction with program participants are required to 1) complete a vulnerability profile tool to determine country- and project-level contextual risks, and 2) complete a safeguarding risk assessment and action planning tool at the initiation of the project and annually thereafter to assess adherence to FHI 360's safeguarding minimum standards and outline strategies for meeting the minimum standards over the project's lifecycle.

6. Training and Awareness

Employees are required to read and acknowledge the Code, including the anti-trafficking section, upon hire and complete the online Code and Safeguarding training modules. All employees are required to repeat the Code training modules bi-annually, and to re-read and acknowledge the Code in the alternate years.

In addition, Safeguarding Focal Points and project teams deliver more in-depth virtual or in-person safeguarding training, as needed, to FHI 360 personnel and supplier personnel who interact with program participants. FHI 360 has a separate Volunteer Code of Conduct for volunteers and incentive workers working on FHI 360 projects; project teams are responsible for orienting all volunteers and incentive workers to the Code and obtaining their signatures on the Code.

FHI 360 is also taking steps to host a safeguarding e-Module on an external platform that will be accessible to all suppliers. This e-Module will include detailed information about FHI 360's safeguarding commitments, policies, and reporting mechanisms.

This statement was approved by FHI 360's Board of Directors in May 2022.

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Tessie San Martin

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Tessie San Martin
Chief Executive Officer
FHI 360