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## POL 01029 Combating Trafficking in Persons

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### PURPOSE:

To set out FHI 360's guiding principles and requirements with respect to Combating Trafficking in Persons in all aspects of our programmatic work and organizational functions.

### SCOPE:

This policy applies to all FHI 360 Personnel worldwide, and to Suppliers and Supplier Personnel to the extent set out below.

### DEFINITIONS:

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| 1. <i>Commercial Sex Act</i>           | Any sex act on account of which anything of value is given to or received by any person.  |
| 2. <i>FHI 360 Personnel</i>            | FHI 360 employees, officers, members of its Board of Directors, interns and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on behalf of FHI 360.   |
| 3. <i>Forced Labor</i>                 | Knowingly providing or obtaining the labor or services of a person by express or implied threats of serious harm to, or physical restraint against, that person or another person.  |
| 4. <i>Program Participant</i>          | Any adult or child who is served by FHI 360 programs, or has contact with FHI 360 Personnel, Suppliers, or Supplier Personnel in connection with or as a result of FHI 360's programs or business activities.   |
| 5. <i>Supervisor</i>                   | An employee of FHI 360 who is in a direct supervisory role over the work of one or more employees of FHI 360.   |
| 6. <i>Supplier</i>                     | Any FHI 360 contractor, consultant, vendor, service provider, subcontractor, or subrecipient.   |
| 7. <i>Supplier Personnel</i>           | A Supplier's employees, consultants, interns, and fellows (paid or unpaid) volunteers, agents, and other individuals authorized to act on Supplier's behalf.  |
| 8. <i>Trafficking in Persons (TIP)</i> | <ul style="list-style-type: none"> <li>a. The recruitment, harboring, transportation, provision, obtaining, or receipt of a person through the use of force, fraud, coercion, or abuse of power for purposes of commercial sex acts or sexual exploitation.</li> <li>b. The recruitment, harboring, transportation, provision, obtaining, or receipt of a person through the use of force, fraud, coercion, or abuse of power for the purpose of subjection to involuntary servitude, peonage, debt bondage, forced labor or services, slavery or practices similar to slavery.</li> <li>c. The recruitment, harboring, transportation, provision, obtaining, or receipt of a person who has not yet attained the age of 18 for any of the purposes listed above, whether or not through the use of force, fraud, coercion, or abuse of power.</li> </ul> |

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### **POLICY:**

#### **1. Statement of Policy**

- 1.1. FHI 360 is opposed to all forms of TIP and is committed to mitigating the risk of TIP in connection with its operations and programs.
- 1.2. FHI 360's policy on Combating Trafficking in Persons ("CTIP") aligns with international, U.S., and U.K. government standards that aim to prevent trafficking in persons, including relevant standards outlined in the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children ("The Palermo Protocol") (November 2000); the U.K. Modern Slavery Act 2015 (March 2015); and the U.S. government's laws, regulations and policies prohibiting Trafficking in Persons by government contractors and award recipients, including, but not limited to, FAR Subpart 22.17 – Combating Trafficking in Persons; FAR § 52.222-50 – Combating Trafficking in Persons; FAR § 52.222-56 – Certification Regarding Trafficking in Persons Compliance Plan; and USAID's Standard Provision 303maa M20 or its alternate ("Anti-Trafficking Provisions") as more fully set forth in this policy.

#### **2. Prohibited Conduct**

- 2.1. In accordance with United Nations standards and U.S. and U.K. government policy, all FHI 360 Personnel, Suppliers, and Supplier Personnel are strictly prohibited from:
  - 2.1.1. Engaging in any form of Trafficking in Persons (as defined above);
  - 2.1.2. Purchasing commercial sex acts at any time (during work hours and non-work hours) during the period of an FHI 360 project or business activity;<sup>1</sup>
  - 2.1.3. Using forced labor in the conduct of FHI 360 business;
  - 2.1.4. Destroying, concealing, confiscating, or otherwise denying any FHI 360 or Supplier Personnel access to their identity or immigration documents, such as passports or drivers' licenses;
  - 2.1.5. Using misleading or fraudulent recruiting practices during the recruitment of FHI 360 or Supplier Personnel or offering of employment to employees, such as failing to disclose (in a format and language accessible to the employee) or making material misrepresentations about the key terms and conditions of employment, including wage and benefits, work location, living conditions, housing, and associated costs (if provided or arranged by FHI 360 or the Supplier), significant costs to be charged to the employee, and the hazardous nature of the work (where applicable);
  - 2.1.6. Using recruiters that do not comply with the labor laws of the country where recruiting takes place;
  - 2.1.7. Charging recruitment fees to FHI 360 or Supplier Personnel;
  - 2.1.8. Failing to provide or pay the cost of return transportation at the end of employment for an employee who is not a national of the country where the work took place and was brought into that country for purposes of working on a U.S. government contract or award performed outside the U.S.;

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<sup>1</sup> Purchasing commercial sex is prohibited due to the following risks: It is not always possible to know 1) who is consenting to sell sex and who is being forced or coerced into selling sex; or 2) the person's age. Engaging in sexual activity with a person who is under the age of 18 years old, regardless of whether there is force or coercion, violates international standards, many national laws, and FHI 360's safeguarding policies.

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- 2.1.9. Failing to provide or pay the cost of return transportation at the end of employment for an employee who is not a U.S. national and was brought into the U.S. for the purpose of working on a U.S. government contract or award, if payment of such costs is required under existing temporary work programs or pursuant to a written agreement with the employee for portions of contracts and awards performed outside the U.S.;
- 2.1.10. Providing or arranging housing that fails to meet the host country housing and safety standards; and
- 2.1.11. If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document, written in a language the employee understands, that includes details about work description, wages, prohibition on charging recruitment fees, work location, living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons. If the employee must relocate to perform the work, the work document must be provided to the employee at least five days prior to relocation.

### 3. FHI 360's Universal Safeguarding and Anti-Trafficking Compliance Plan and Certifications

- 3.1. **FHI 360's Universal Safeguarding and Anti-Trafficking Compliance Plan:** To ensure due diligence and uniform application of FHI 360's safeguarding policies, funder requirements, and international standards, FHI 360 developed a written Universal Safeguarding and Anti-Trafficking Compliance Plan ("Universal Plan"), which highlights the policies, standards, and procedures that FHI 360 has in place to prevent, detect, address, and respond to allegations of exploitation, sexual abuse, child abuse and neglect, and trafficking in persons. The Universal Plan aligns with U.S. and U.K. Government regulations and international standards related to safeguarding and anti-trafficking.
- 3.2. **All FHI 360 country offices and projects must implement the requirements included in FHI 360's Universal Plan.** (Supplier requirements are included in Section 6.) Additionally, as part of implementing the Universal Plan, projects must complete the required information (placeholders for project-specific information) included in the Universal Plan.
- 3.3. **Supplemental Plans for High-Risk Projects:** Safeguarding and anti-trafficking compliance plans must be appropriate to the size and complexity of the contract or award, and the nature and scope of the activities to be performed, including the trafficking and safeguarding-related risks that the project will involve based on populations served, services provided, and the context where activities will be implemented. Therefore:
  - 3.3.1 Projects that are larger, more complex, or involve a greater risk of exploitation, sexual abuse, child abuse and neglect, or trafficking in persons may need to implement measures in addition to those set out in FHI 360's Universal Plan to ensure that the compliance plans are appropriate to the size and complexity of the project, and the nature and scope of the activities to be performed.
  - 3.3.2 Projects must use the criteria outlined in the Universal Plan to determine if the project is high-risk, and if so, develop additional measures in a Supplemental Plan for High-Risk Projects ("Supplemental Plan") and include these additional measures in Section 6 of the Universal Plan (if applicable).
  - 3.3.3 When required by a funder to have a written compliance plan in place (pre-award), including an assessment to determine if a Supplemental Plan is needed for the project, the proposal team must ensure 3.3.2 is addressed during the proposal design stage.

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When the risk assessment and Supplemental Plan are not required by a funder (pre-award), the assessment should occur and Supplemental Plan developed, where needed, during project start-up.

- 3.4 **Posting of Compliance Plans:** FHI 360 posts its Universal Plan on FHI 360's internal Connect site and on its external website, [www.fhi360.org](http://www.fhi360.org). Hard copies of the Universal Plan will be posted at all FHI 360 offices. Projects that tailor the Universal Plan to include supplemental measures will post their project-specific compliance plans at all project workplaces and sites, except where the project's work is not being performed at a fixed location and email a copy of the tailored plan to all project personnel.
  - 3.5 **Certifications:** Where required by funder, FHI 360 will sign and submit compliance plan certifications for projects as required by applicable regulations and contractual provisions. When funders request compliance plan certifications, project teams should coordinate with the point of contact for their proposal (pre-award) or contract (post-award) to obtain required signature for submission to funder.
4. Reporting Requirements and Procedures for FHI 360 Personnel
- 4.1. All FHI 360 Personnel who observe, suspect, or receive allegations of trafficking-related activity, or any other conduct prohibited by this policy, are required to report the conduct promptly, ideally within 24 hours or as soon as possible under the circumstances, either orally or in writing, by contacting **one** of the following: (Reporting requirements for Suppliers included in Section 6)
    - 4.1.1 FHI 360 immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department
    - 4.1.2 FHI 360 local People and Culture (HR) representative or regional or departmental HR Partner
    - 4.1.3 FHI 360 Director of HR Partnering or Chief People Officer (see FHI 360 HR Connect site for contact information)
    - 4.1.4 FHI 360 Office of Compliance and Internal Audit (OCIA) via one of the following options:
      - Email: [compliance@fhi360.org](mailto:compliance@fhi360.org)
      - Website (anonymously or with your name): <http://www.fhi360.org/anonreportregistry>
      - Confidential Ethics and Compliance Phone Line: +1 833 745 8886 (local airtime charges may apply)
  - 4.2. Anonymous reports are generally more difficult to investigate due to limited information. FHI 360 Personnel are urged to provide as much detailed information as possible about the conduct, including, if possible, identifying people who were involved or who witnessed the conduct, so long as this will not put the persons identified at risk of immediate harm.
  - 4.3. FHI 360 Personnel who are HR staff, supervisors, or hold a position at director level or above are required to promptly report, ideally within 24 hours or as soon as possible under the circumstances, to FHI 360's OCIA or Headquarters HR (Chief People Officer or Director of HR Partnering), of any actual or suspected Trafficking in Persons or other violation of this policy that is reported to them, or that they observe or otherwise become aware of. Failure to do so is a violation of this policy and could lead to disciplinary action, up to and including immediate separation of employment or other relationship with FHI 360.

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4.4. In addition to reporting suspected, observed, or confirmed trafficking related activities through one of the channels listed in Section 4.1, FHI 360 Personnel should refer victims and survivors of TIP to local medical, psycho-social, and legal services, where available, and seek additional support from country-specific counter-trafficking organizations by consulting: <https://globalmodernslavery.org>. Additional referral options include:

- The Global Human Trafficking Hotline at +1-844-888-3733 or [help@befree.org](mailto:help@befree.org)
- (Inside the U.S. only) The National Human Trafficking Hotline: 1-888-373-7888 or by texting HELP to 233733 (BEFREE)

4.5. FHI 360 will investigate all reports of prohibited trafficking-related activity or violations of this policy, take appropriate action, and make any required notifications to government agencies.

### 5. Non-Retaliation

- 5.1. FHI 360 strictly prohibits any retaliation against FHI 360 Personnel, Suppliers, Supplier Personnel, or Program Participants who complain about TIP, trafficking-related activity, or other violations of this policy or related procedures, or who participate in any internal or government TIP investigation. FHI 360 Personnel can refer to FHI 360's Open Door and No Retaliation (POL 03004) for additional information.
- 5.2. Retaliation occurs when someone penalizes or threatens to penalize another person for reporting or expressing an intent to report what they believe in good faith to be TIP or any other violation of this policy, assisting others in reporting TIP or policy violations, or participating in investigations under this policy.
- 5.3. 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 a TIP investigation.
- 5.4. Suspected retaliation should be promptly reported via the reporting mechanisms set out in Sections 4 (FHI 360 Personnel) and 6 (Suppliers).
- 5.5. FHI 360 Personnel who engage in retaliation will be subject to disciplinary action up to and including separation of employment or other relationship with FHI 360.

### 6. Expectations of Suppliers and Supplier Personnel

- 6.1. All Suppliers and Supplier Personnel must refrain from any conduct that violates this policy.
- 6.2. FHI 360 requires that Suppliers uphold the principles of this policy and take steps to prevent Trafficking in Persons or any of the trafficking-related activities prohibited in Section 2 above by Supplier Personnel. Failure to do so may result in termination of Supplier's contractual relationship with FHI 360.
- 6.3. Suppliers or Supplier Personnel who witness conduct prohibited by this policy or who identify that Supplier Personnel have engaged in any such conduct should promptly report the conduct, ideally within 24 hours or as soon as possible under the circumstances, either orally or in writing, to the FHI 360 OCIA by **one** of the following means:
  - 6.3.1 Email: [Compliance@fhi360.org](mailto:Compliance@fhi360.org)
  - 6.3.2 Confidential Ethics and Compliance Phone Line: +1 833 745 8886 (local airtime charges may apply)
  - 6.3.3 Website (anonymously or with your name)  
<http://www.fhi360.org/anonreportregistry>

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- 6.4. FHI 360 requires that all Suppliers and Supplier Personnel cooperate fully with investigations of policy violations and provide truthful information to investigators.
  - 6.5. Written Compliance Plans: Where funder requirements apply, FHI 360's Suppliers must maintain their own written anti-trafficking compliance plans, which can be a combined safeguarding and anti-trafficking compliance plan. Suppliers may refer to FHI 360 Universal Plan for their own adaptation and use.
  - 6.6. Certifications: Where funder requirements apply, Suppliers must submit pre-award and/or annual Certifications.
  - 6.7. FHI 360 will include appropriate language reflecting the applicable requirements in Supplier contracts and other agreements.
7. Consequences of Policy Violations
- 7.1. FHI 360 Personnel, Suppliers, and Supplier Personnel who engage in any activity that violates this policy; fail to report or forward reports of suspected trafficking-related activity; or otherwise violate supplier obligations detailed in this policy will be subject to disciplinary action, up to and including immediate termination of employment or other relationship with FHI 360.
  - 7.2. 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 appropriate action, including criminal prosecution, in all relevant jurisdictions.

### RELATED DOCUMENTS:

#### 1. Policies

- Code of Ethics & Conduct
- POL 01029: Combating Trafficking in Persons
- POL 01030: Safeguarding of Children
- POL 03003: Professional Standard of Conduct
- POL 03004: Open Door and No Retaliation
- POL 03011: Employee Discipline
- POL 03029: Harassment-Free Work Environment
- POL 03041: Violence-Free Work Environment
- POL 03051: Administrative Leave

#### 2. Standard Operating Procedures

N/A

#### 3. Appendices

- APX 01029\_01: Universal Safeguarding and Anti-Trafficking Compliance Plan

### REFERENCES:

1. FAR Subpart 22.17 – Combating Trafficking in Persons (October 2020)
2. FAR 52.222-50 – Combating Trafficking in Persons (November 2021)
3. FAR 52.222-56 – Certification Regarding Trafficking In Persons Compliance Plan (October 2020)
4. USAID's Standard Provision M20 regarding Trafficking In Persons – US Nongovernmental Organizations (April 2016)



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5. USAID’s Standard Provision M27 regarding Safeguarding Against Exploitation, Sexual Abuse, Child Abuse, and Child Neglect – US Nongovernmental Organizations (October 2023)
6. The United Nations Protocol to Prevent, Suppress, and Punish Trafficking in Persons Especially Women and Children (“The Palermo Protocol”) (November 2000)
7. The U.K. Modern Slavery Act 2015 (March 2015)
8. The Foreign, Commonwealth & Development Office (FCDO) Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (SEAH) Due Diligence Guidance for FCDO implementing partners (January 2022) and Child Safeguarding Due Diligence for external partners (November 2022).

### REVISION HISTORY:

POL#	Date Reviewed DD MMM YYYY	Summary of Changes
POL 01029	October 2015	New Policy
POL 01029	16 June 2017	Updated Prohibited Activities terminology, clarified investigation responsibility, and added appendix reference
POL 01029	4 JUN 2019	Updated definitions of Supplier and Supplier Personnel. Clarified expectations of Supplier conduct and their obligations. Adjusted language regarding Compliance Plans to match FAR.
POL 01029	21 AUG 2019	Provided additional information about how to contact programs that offer assistance to trafficking victims.
POL 01029	16 OCT 2019	Minor administrative change to remove compliance plan requirement for subawards in Section 3.1
POL 01029	18 AUG 2021	Added “program participant” and “supervisor” to Definitions; Updated definitions of Supplier and Supplier Personnel (removed “supplier” from definition); Clarified that purchasing commercial sex is prohibited at any time (during work and non-work hours) during the period of any FHI 360 project or business activity; Revised commitment statement to emphasize that it aligns with U.S. and U.K. government and international standards; Removed “prostitution” from the TIP definition; Clarified that using forced labor is prohibited during any FHI 360 business activity; Added new requirement for all FHI 360 country offices and projects to implement FHI 360’s Universal Plan; Clarified the requirement for all projects to assess whether they are considered a high-risk project and added risk criteria and information about adding a Supplemental Plan, where needed; Added information about country-specific hotline numbers and Skype to reporting mechanisms; added requirement for HR staff to report promptly to HQ HR or OCIA; Updated language to include prohibiting retaliation by Suppliers and Supplier Personnel; Updated information about Suppliers’ written compliance plans.
POL 01029	21 JUL 2023	Minor administrative change to update section 4.1.3 with titles vs. specific employee names.
POL 01029	01 FEB 2024	Changed Chief Human Resources Officer to Chief People Officer throughout. Changed Universal Anti-Trafficking Compliance Plan to Universal Safeguarding and Anti-Trafficking Compliance Plan. Updated compliance plan information for Supplier Obligations. Updated references.
POL 01029	21 APR 2025	Updated reporting mechanisms.

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### VERSION HISTORY

#### POL 01029 (v7.0)

**Approved:** 30-APR-2025 | **Effective:** 01-MAY-2025 | **Retired:** N/A  
Updated reporting mechanisms.

#### POL 01029 (v6.0)

**Approved:** 22-MAR-2024 | **Effective:** 21-APR-2024 | **Retired:** 01-MAY-2025

Changed Chief Human Resources Officer to Chief People Officer throughout. Changed Universal Anti-Trafficking Compliance Plan to Universal Safeguarding and Anti-Trafficking Compliance Plan. Updated compliance plan information for Supplier Obligations. Updated references. Collaborated with Kim Dixon, Kristen Lingo, Susan Voskuil, Sean Temeemi and Useetha Rhodes

#### POL 01029 (v5.0)

**Approved:** 24-SEP-2021 | **Effective:** 24-OCT-2021 | **Retired:** 21-APR-2024

Added “program participant” and “supervisor” to Definitions; Updated definitions of Supplier and Supplier Personnel (removed “supplier” from definition). Clarified that purchasing commercial sex is prohibited at any time (during work and non-work hours) during the period of any FHI 360 project or business activity. Revised commitment statement to emphasize that it aligns with U.S. and U.K. government and international standards. Removed “prostitution” from the TIP definition. Clarified that using forced labor is prohibited during any FHI 360 business activity. Added new requirement for all FHI 360 country offices and projects to implement FHI 360’s Universal Plan. Clarified the requirement for all projects to assess whether they are considered a high-risk project and added risk criteria and information about adding a Supplemental Plan, where needed. Added information about country-specific hotline numbers and Skype to reporting mechanisms; added requirement for HR staff to report promptly to HQ HR or OCIA. Updated language to include prohibiting retaliation by Suppliers and Supplier Personnel. Updated information about Suppliers’ written compliance plans. Reviewed by: Kathy Stroker (General Counsel), Pam Myers (HR), Susan Voskuil (CMS), Sean Temeemi (OCIA), Kim Dixon (GESI), Andrea Bertone (GESI), Suely Harada (OCIA), Jason Kelleher (G3E)  
30 AUG 2021.

#### POL 01029 (v4.0)

**Approved:** 16-OCT-2019 | **Effective:** 16-OCT-2019 | **Retired:** 24-OCT-2021

### ELECTRONIC SIGNATURES

#### Approvals

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I am the author of this document.  
*Signed 09:56:49 AM UTC 30-APR-2025*

**Document Manager Approval**

I have reviewed and approve this document.  
*Signed 04:57:28 PM UTC 30-APR-2025*

**Policy Owner Approval**

I have reviewed and approve this document.  
*Signed 06:54:52 PM UTC 30-APR-2025*



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**Policy Reviewer Approval**

I have reviewed and approve this document.  
*Signed 07:14:44 PM UTC 30-APR-2025*

**Policy Exec Approval**

I have reviewed and approve this document.  
*Signed 09:41:26 PM UTC 30-APR-2025*