

Combatting Trafficking in Persons (TIP) Compliance Plan

International Medical Corps is opposed to human trafficking in any form and is committed to mitigating the risk of human trafficking in all aspects of our organization. International Medical Corps has a zero-tolerance policy for any staff¹, partner², or other third-party that is conducting business with International Medical Corps engaging in any form of trafficking in persons.

Trafficking in Persons is defined as the recruitment, harboring, transportation, provision or obtaining of a person for labor or services through the use of force, fraud, or coercion for the purpose of subjection to:

- **Involuntary servitude:** 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 the abuse or threatened abuse of the legal process;
- **Peonage:** status or condition of involuntary servitude based on real or alleged indebtedness;
- **Debt bondage:** includes a pledge of services by the debtor or someone under debtor's control to pay down known or unknown charges (e.g., fees for transportation, boarding, food, and other incidentals; interest, fines for missing quotas, and charges for "bad behavior"). The length and nature of those services are not respectively limited and defined (where an individual is trapped in a cycle of debt that he or she can never pay down).
- **Slavery:** state of being under the ownership or control of someone where a person is forced to work for another; or
- **Sex trafficking:** recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.

Trafficking in Persons also includes any procurement of a commercial sex act (regardless of the age of the person induced to engage in such act), and any instance of forced labor.

In this regard, International Medical Corps staff are required to comply with applicable U.S. Government regulations and any award conditions on combatting trafficking in persons, as well as International Medical Corps' Safeguarding Policy, which includes provisions on combatting trafficking in persons (these provisions are referred to as the "TIP Prevention Policy" in this Plan).

This document sets forth the primary components of International Medical Corps' global Compliance Plan in accordance with the requirements of USAID Standard Provision M20 for U.S. nongovernmental

¹ *Staff* means International Medical Corps directors, trustees, officers, employees, volunteers, and interns.

² *Partner* means International Medical Corps subrecipients, partner organizations, contractors, consultants, and any other individual or entity that acts on International Medical Corps' behalf or at International Medical Corps' direction.

organizations, which may be modified for specific awards based upon their size and complexity of this award and the nature and scope of the activities.

Compliance Plan Components

The key components of International Medical Corps' Combatting Trafficking in Persons Compliance Plan are summarized below and are more fully described in the sections that follow.

- (1) An awareness program to inform staff about the trafficking-related prohibitions described in the Safeguarding Policy, the activities prohibited, and the action that will be taken against the staff member for violations.
- (2) A reporting process for staff and partners to report, without fear of retaliation, activity inconsistent with the TIP Prevention Policy, including a means to make the Global Human Trafficking Hotline available to all employees. The Global Human Trafficking Hotline number is 1-844-888-FREE, and its email address at help@befree.org.
- (3) Recruitment and wage provisions that only permit the use of recruitment companies with trained employees, prohibit charging recruitment fees to the staff member, and ensure that wages meet applicable host-country legal requirements, or explain any variance.
- (4) Housing provisions that require housing to meet host-country housing and safety standards.
- (5) Procedures for International Medical Corps to prevent any agents or subrecipients at any tier or dollar value from engaging in trafficking activities described in section (a) of USAID's Mandatory Standard Provision 20, and procedures to monitor, detect, and terminate any agents or subrecipients (or employees) that have engaged in such activities.

1. Awareness Program

All International Medical Corps staff members are informed of the TIP Prevention Policy, reporting mechanisms, and actions that will be taken for violations. The TIP Prevention Policy and related materials are available on our internal website, and information on the Safeguarding Policy is included on posters available in all field and headquarters offices.

International Medical Corps requires all staff members to complete training on Safeguarding and Respectful Workplace, which includes training on International Medical Corps' TIP Prevention Policy; certify that they have read and understand International Medical Corps' Code of Conduct & Ethics; agree to comply with the policies, procedures, and principles of the TIP Prevention Policy; and report any known or suspected violations.

International Medical Corps also conducts annual refresher training for all staff that includes training on combatting human trafficking.

As part of its awareness program, International Medical Corps distributes the applicable TIP Compliance Plan, which is required for all USAID projects over \$500,000, to staff working on the project at the initiation of the project via email. The Compliance Plan is also available at fixed project offices and worksites. Any questions about the TIP Compliance Plan can be sent to TIP@InternationalMedicalCorps.org.

International Medical Corps staff are encouraged to increase awareness and knowledge about trafficking in persons by visiting the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons website at: <http://www.state.gov/j/tip>.

2. Reporting Process

All International Medical Corps staff have a responsibility to report, in good faith and without fear of retaliation, any activity that violates the Safeguarding Policy. Staff are subject to protection under 10 U.S.C. § 2409 against reprisal for whistleblowing on trafficking in persons violations.

Reporting mechanisms include:

<p>In person, report to any of the following:</p> <ul style="list-style-type: none"> • Supervisor • Country Director • Safeguarding Focal Point • Human Resources Department (local or HQ) • Ethics & Compliance Department (local or HQ) • Legal Department (HQ)
<p>Email:</p> <p>report@internationalmedicalcorps.org</p>
<p>On the Internet: Ethics Point</p> <p>www.internationalmedicalcorps.ethicspoint.com</p> <ul style="list-style-type: none"> • >To Make A Report> “Select the country in which you are located.”
<p>Global Human Trafficking</p> <p>Staff may also file a report with the Global Human Trafficking Hotline at (US) 1-844-888-FREE (when calling from outside the U.S., first dial the origin country’s exit code) and its e-mail address at help@befree.org.</p>

Staff should consult their immediate supervisor, the Human Resources Department, the Ethics & Compliance Department, or the Legal Department if they are uncertain whether a specific action would be in violation of the TIP Prevention Policy.

International Medical Corps notifies the cognizant Agreement Officer and Office of Inspector General upon receipt of any credible information from any source that alleges that International Medical Corps, a staff member, a subrecipient, a subcontractor, or agent has engaged in any of the prohibited activities identified in the TIP Prevention Policy if the allegation pertains to a program funded by a United States government entity. International Medical Corps will investigate such allegations and take appropriate remedial measures. In addition, International Medical Corps will fully cooperate with any United States federal government agencies responsible for audits, investigation, or corrective actions relating to trafficking in persons.

3. Recruitment and Wage Provisions

International Medical Corps' recruitment staff will comply with all internal policies and host country recruitment standards to combat trafficking in persons and trafficking-related activities.

To the extent that International Medical Corps uses recruitment companies, only companies with employees trained in combatting human trafficking may be used, and no recruitment fees may be charged to employees.

International Medical Corps will pay all employees wages that meet applicable host-country legal requirements, or will explain any variance.

4. Housing Provisions

International Medical Corps ensures that housing for all our staff meets host-country housing and safety standards. International Medical Corps maintains Accommodations Guidelines to provide standard principles for staff accommodations in its country programs.

5. Subawards and Contracts

Subawards and contracts under the applicable awards must include a provision prohibiting the conduct described in sections (1)-(4) of USAID's Mandatory Standard Provision on Combating Human Trafficking. Subrecipients will receive a copy of the applicable Compliance Plan and be bound to the same requirements as International Medical Corps. Prior to issuing any subawards exceeding an estimated value of \$500,000, International Medical Corps shall obtain from each subrecipient the same certification as required by the applicable U.S. regulations.

In addition, International Medical Corps maintains a Vendor Code of Conduct, published on its website and signed as part of the vendor registration process, which states:

Vendors must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Vendors must refrain from violating the rights of others and address any adverse human rights impacts of their operations. Vendors must educate employees on prohibited trafficking activities, discipline employees found to have violated the law or rules, and notify International Medical Corps of violations and action taken against employees. Specifically, vendors will be prohibited from the following in all contracts: • Destroying, concealing, or confiscating identity or immigration documents; • Using misleading or fraudulent tactics in recruiting; • Charging employee recruitment fees or providing inadequate housing based on local standards, laws, and directives; • Failing to provide employment contracts and other documentation in the employee's native language; • Failing to provide return transportation upon the end of employment for employees brought to the country for the purpose of working on a U.S. Government award; and • Failing to interview and protect employees suspected of being trafficking victims.

Violations of this Compliance Plan or International Medical Corps' TIP Prevention Policy is grounds for International Medical Corps to take any and all appropriate actions, up to and including termination of the subaward or the contract.



Questions

Questions regarding International Medical Corps' TIP Prevention Policy and actions to combat trafficking in persons may be directed to the Human Resources Department, the Ethics & Compliance Department, the Legal Department, or TIP@InternationalMedicalCorps.org.