

Preventing Trafficking in Persons Policy and Compliance Plan

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IPM Headquarters

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Policy and Compliance Plan¹²:

IPM is committed to conducting business in an ethical manner and in compliance with all applicable laws and regulations. Further, as a recipient of USAID funding IPM is implementing a Compliance Plan to ensure that no employee, contractor, consultants or anyone acting on behalf of IPM engages in:

- Trafficking in Persons (as defined in the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Transnational Organized Crime)
- Procurement of a commercial sex act
- Use of forced labor in the performance of any of IPM's activities
- Acts that directly support or advance trafficking in persons, including the following acts:
 - Destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents;
 - Failing to provide return transportation or pay for return transportation costs to an employee from a country outside the United States to the country from which the employee was recruited upon the end of employment if requested by the employee, unless:
 - exempted from the requirement to provide or pay for such return transportation by USAID under this award; or
 - the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action
 - Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment;
 - Charging employee recruitment fees; or
 - Providing or arranging housing that fails to meet the host country housing and safety standards

Further, IPM commits to having the following: (a) a recruitment and wage plan that only permits the use of recruitment companies with trained employees, prohibits charging of recruitment fees to the employee, and ensures that wages meet applicable host-country legal requirements or explains any variance; and (b) a housing plan (where IPM's provides arranged housing), if applicable, that meets any host-country housing and safety standards.

IPM staff will be informed of this Compliance Plan via email and the Plan will be incorporated in employee manuals, annual training modules and posted on IPM's internal website (SharePoint). Further, IPM will inform its USAID funded recipients, subawardees, or contractor of this requirement by adding the relevant USAID Standard Provision to the USAID funded sub-award or contract.

All IPM employees are required to comply with the requirements of this Plan. An employee not in compliance with the Plan is subject to disciplinary action up to and including termination of employment.

¹ [USAID Standard Provisions for US NGOs](#)

² [USAID Standard Provisions for Non US NGOs](#)

Employees also have a responsibility to report any activity in violation of this policy prohibiting Trafficking in Persons.

Employees must follow the reporting requirements in IPM's Whistleblower Policy to report activity inconsistent with this Plan by raising concern through:

- Chief Executive Officer (CEO) and/or
- Chair of the Finance Committee
- Navex Global Hotline o Number: 844-252-3069 and/or o URL: ipmglobal.ethicspoint.com

Employees, subawardees or contractors may also report activity inconsistent with this Plan using the Global Human Trafficking Hotline at 1-844-888- FREE or at help@befree.org.