



iMMAP, Inc.

**Preventing Human Trafficking Compliance Plan
2016**

References

- iMMAP's Policy on Preventing Trafficking in Persons
- iMMAP's Code of Conduct

I. Staff Awareness

All iMMAP staff and subawardees will be informed about the iMMAP Policy on Preventing Human Trafficking and its trafficking related prohibitions, the reporting system, and the actions that will be taken against the staff for violations. iMMAP will share the Global Human Trafficking Hotline (1-844-888-FREE) and the e-mail address at help@befree.org with all staff. The policy's adoption and any subsequent revisions will be announced in company-wide e-mails. All newly hired staff will be required to read and acknowledge the Policy. iMMAP may also conduct specialized training on the Policy and Compliance Plan on an as-needed basis.

II. Reporting Mechanism

iMMAP has an incident reporting mechanism in place for among other things: security, fraud and corruption, protection and abuse, legal and financial claims. Preventing human trafficking related issues are reported via the same reporting mechanism. Employees have the option to report to an HQ email address or the above shown Global Human Trafficking Hotline.

III. Recruitment and Wage Plan

- iMMAP fully and accurately discloses key employment terms and conditions in contracts and pre-deployment briefings
- iMMAP ensures that all wages meet host country legal requirements
- iMMAP does not work with recruitment companies
- iMMAP does not charge recruitment fees to staff
- iMMAP prohibits destroying, concealing or otherwise denying staff access to his or her identity or immigration documents
- iMMAP will pay the cost of return transportation at the end of deployment to any staff who is not a national of the country where the work was performed

IV. Housing Arrangements

iMMAP uses the following housing arrangements:

- International staff may be housed in a team house rented by iMMAP. In these cases, the housing will at a minimum meet host country housing and safety standards.

- International staff may stay in selected hotels or rent their own apartments paid by iMMAP
- iMMAP does not arrange housing for subawardees or national staff

V. Subawardees

iMMAP signs project agreements with subawardees in which they agree to carry out their responsibilities in accordance with the provisions of the applicable award. Based on the agreement, subawardees commit themselves to design and implement projects in accordance with iMMAP's Code of Conduct and Policy to Prevent Human Trafficking.

VI. Monitoring

iMMAP monitors adherence to the Code of Conduct and the Policy to Prevent Human Trafficking during visits from regional senior staff and headquarters representatives.

VII. Remediation

Where misconduct is uncovered through individual reporting, an internal investigation, third party audits, or otherwise, the misconduct will be remedied in one of the following ways:

- Remove the violating personnel from work on U.S. Government awards
- Reduce the violating personnel benefits
- Potentially terminate the violating personnel's employment with iMMAP

Additional preventative measures will be implemented to reduce the risk of reoccurrence on an as-needed basis.

APPROVAL



William Barron, Chief Executive Officer