



iMMAP, Inc.

**Preventing Human Trafficking Policy
2016**

I. Background

The United States Government maintains a zero tolerance policy for human trafficking. As such iMMAP Inc. (“iMMAP”) has adopted the zero tolerance policy for human trafficking outlined below.

II. Applicability

This Policy applies to all iMMAP personnel working on U.S. Government awards, and those whose functions are associated with work on U.S. Government awards.

III. Definitions

1. “Coercion” means—
 - a. Threats of serious harm to or physical restraint against any person;
 - b. Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or
 - c. The abuse or threatened abuse of the legal process.
2. “Commercial sex act” means any sex act on account of which anything of value is given to or received by any person.
3. “Debt bondage” means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.
4. “Personnel” means an employee, consultant or volunteer of iMMAP directly engaged in the performance of work under a Government award who has other than a minimal impact or involvement in award performance.
5. “Forced Labor” means knowingly providing or obtaining the labor or services of a person—
 - a. By threats of serious harm to, or physical restraint against, that person or another person;
 - b. By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
 - c. By means of the abuse or threatened abuse of law or the legal process.

6. “Involuntary servitude” includes a condition of servitude induced by means of—
 - a. Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or
 - b. The abuse or threatened abuse of the legal process.
7. “Severe forms of trafficking” in persons means—
 - a. Sex trafficking in which a 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; or
 - b. 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, debt bondage, or slavery.
8. “Sex trafficking” means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

IV. Statement of Policy

iMMAP has adopted a zero tolerance policy regarding trafficking in persons. iMMAP personnel, and the personnel of subcontractors performing work for iMMAP, shall not —

- a. Engage in severe forms of trafficking in persons;
- b. Procure commercial sex acts; or
- c. Use forced labor in the performance of any U.S. Government award;
- d. Destroy, conceal, confiscate, or otherwise deny access by personnel to the personnel's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- e. Use misleading or fraudulent practices during the recruitment of personnel or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of personnel regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if arranged by iMMAP), any significant cost to be charged to the personnel, and, if applicable, the hazardous nature of the work;
- f. Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- g. Charge personnel recruitment fees;
- h. Fail to provide return transportation or pay for the cost of return transportation upon the end of employment—
 - i. For personnel who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government award (for portions of contracts performed outside the United States); or

ii. For personnel who is not a United States national and who was brought into the United States for the purpose of working on a U.S. Government award or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the personnel (for portions of award performed inside the United States); except that—

1. The requirements of paragraphs (h)(i) and (h)(ii) above shall not apply to personnel who is—

- a. Legally permitted to remain in the country of employment and who chooses to do so; or
- b. Exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation;

2. The requirements of (h)(i) and (h)(ii) above are modified for a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons. iMMAP shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. For example, iMMAP shall not offer return transportation to a witness at a time when the witness is still needed to testify.

i. Provide or arrange housing that fails to meet the host country housing and safety standards; or

j. If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the personnel understands. If the personnel must relocate to perform the work, the work document shall be provided to the personnel prior to the personnel relocating. The personnel's work document shall include, but is not limited to, details about work description, wages, living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and applicable laws and regulations that prohibit trafficking in persons.

V. Corrective Actions

iMMAP may, at its sole discretion, take the following actions against personnel for violations of this policy.

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

VI. Notification

iMMAP will immediately notify the cognizant Agreement Officer and the U.S. Government Office of the Inspector General; and will fully cooperate with any Federal agencies responsible for audits, investigations, or corrective actions relating to trafficking in persons.

VII. Flow Down

iMMAP shall flow down the provisions prohibiting the conduct described above to all subcontractors working on U.S. Government awards.

VIII. Reporting

Personnel may report, without fear of retaliation, activity inconsistent with this policy prohibiting human trafficking by contacting iMMAP’s Chief Executive Officer at +1 (202) 999-4245 or wbarron@immap.org or the Global Human Trafficking Hotline at 1-844-888-FREE and its e-mail address at help@befree.org

IX. Additional Information

Additional information about Trafficking in Persons can be found at the Web site for the Department of State's Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip/>. For more information related to human trafficking and your responsibilities under this Policy, please contact— Ellen Klene, Finance & Contracts Director, +1 (202) 999-4251 or eklene@immap.org.

APPROVAL



William Barron, Chief Executive Officer