

EngenderHealth Anti-Trafficking Policy

1. Purpose and Applicability

EngenderHealth is committed to high standards of ethics and integrity throughout all operations, including the prohibition of actions that would support trafficking in persons and procedures to prevent such acts and report any violations.

In addition, this policy establishes a program compliant with standard provision M20 of USAID and Title XVII of the National Defense Authorization Fiscal Year 2013, which prohibits EngenderHealth and our partners, subawardees, subgrantees, vendors, employees, labor recruiters, brokers or other agents from engaging in:

1. 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);
2. Procurement of a commercial sex act;
3. Use of forced labor; and
4. Acts that directly support or advance trafficking in persons, including but not limited to:
 - a. Destroying, concealing, confiscating, or otherwise denying an employee access to their identity or immigration documents;
 - b. Failing to provide return transportation to an employee relocated by EngenderHealth to a posting outside the country in which they were recruited, unless:
 - i. exempted from the requirement to provide or pay for such return transportation by the USAID award; or
 - ii. 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;
 - c. 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;
 - d. Charging employees recruitment fees ; and
 - e. Providing or arranging housing that fails to meet housing and safety standards.

The full text of USAID Standard Provision M20 is available on the USAID website:

<https://www.usaid.gov/sites/default/files/documents/1868/303maa.pdf>

This Anti-Trafficking Policy is applicable to all programs and operations across EngenderHealth, including our partners, subawardees, subgrantees, vendors, employees, labor recruiters, brokers or other agents acting upon our behalf.

2. Awareness Program

EngenderHealth ensures the dissemination of this policy through the following processes:

- Employees: Each new employee receives orientations on policies and procedures scheduled by Human Resources as soon as possible upon the commencement of their work. This Anti-Trafficking policy is included in its entirety and employees sign a certification that they have received and understand the policy and its provisions. Refresher trainings on ethics policies, including this Anti-Trafficking Policy, are provided as-needed and on an ongoing basis by HR and the Director of Compliance. Individuals may contact the Director of Compliance at any time for questions, clarifications, or further discussion.
- Subrecipients and Subgrantees: EngenderHealth award and grant templates include reference to this policy and Title XVII of the National Defense Authorization Fiscal Year 2013. At the time of

award, subrecipients and subgrantees must confirm that they have read and understand the referenced policy and provision. For awards and grants already issued prior to the enactment of this policy, award modifications will be issued adding this clause and confirming understanding of them. For both new awards and modifications, this includes the requirement for them to have their own Anti-Trafficking Policy and comply with reporting requirements. Subrecipients and subgrantees may contact EngenderHealth at any time for questions, clarifications, or further discussion.

- Vendors, consultants, suppliers, and other agents: EngenderHealth contractual instruments, including but not limited to consulting agreements, professional service agreements, and purchase orders include reference to this policy and Title XVII of the National Defense Authorization Fiscal Year 2013. Subrecipients and subgrantees must confirm that they have read and understand the referenced policy and provision upon signing the contractual instrument, and may contact EngenderHealth at any time for questions, clarifications, or further discussion.

Publication of the Anti-Trafficking policy: This policy is published in the following locations:

- HR Policies and Procedures issued by the HR department
- Bulletin boards that display policies in EngenderHealth offices
- The public EngenderHealth website at www.engenderhealth.org
- The internal intranet website for EngenderHealth staff

3. Reporting

All partners, subawardees, subgrantees, vendors, employees, labor recruiters, brokers or other agents are required to report suspected violations of this policy immediately. Reports may be submitted through the following routes:

- Supervisor or manager: any individual may report suspected violations at any time through their direct supervisors or the manager in charge of their procurement or activity. Subsequently, supervisors and managers must in turn forward any reports to the Director of Compliance and the Director of HR.
- Director of HR and Director of Compliance: any individual may submit a report of suspected violations directly to the Director of HR or the Director of Compliance, who will subsequently share the report with each other.
- EthicsPoint: Any individual may submit a report of suspected violations through the EthicsPoint reporting system via 1-866-739-4117 or www.ethicspoint.com. A key feature of this site is that it exists on EthicsPoint's servers; therefore, all reporters can remain anonymous, unless the reporter wishes to disclose his/her identity. EthicsPoint will retain all information and files sent, will act as an intermediary in any follow up communications, and will track the response and follow up by EngenderHealth management.
- Global Human Trafficking Hotline: any individual may submit a report of suspected violations directly to 1-844-888-FREE or help@befree.org.

This Anti-Trafficking Policy is implemented in conjunction with the protections afforded by the EngenderHealth Whistleblower Policy. The Whistle Blower Policy is available for full review on both the EngenderHealth intranet and the public website at www.ethicspoint.com. In summary, it is the responsibility of all individuals to report in good faith any concerns they may have regarding actual or suspected activities which may be illegal or in violation of EngenderHealth's policies, and EngenderHealth strictly prohibits any demotion, harassment, or any other form of retaliation against individuals who report suspected violations in good faith.

For USAID awards containing Standard Provision M20 that exceed an estimated value of \$500,000, EngenderHealth must submit to the Agreement Officer, the annual "Certification regarding Trafficking in Persons, Implementing Title XVII of the National Defense Authorization Act for Fiscal Year 2013" as

required, and must implement a compliance plan to prevent the activities described in this provision. EngenderHealth must provide a copy of the compliance plan to the Agreement Officer upon request and must post the useful and relevant contents of the plan or related materials on its website and at the workplace.

If EngenderHealth receives any credible information from any source that alleges that EngenderHealth, its employee, contractor, subrecipient, subawardee, partner, vendor, or other agent has engaged in any of the prohibited activities identified in this provision, EngenderHealth will immediately notify the cognizant Agreement Officer and the USAID 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.

4. Investigations:

In addition, EngenderHealth will internally investigate suspected violations as appropriate through the offices of the Director of Compliance and Internal Audit. The Director of Compliance and Director of Internal Audit will assign an internal investigator to conduct an investigation and report its findings to Senior Management, who will determine what, if any, remedial or disciplinary action is appropriate.

The Director of Compliance will monitor EngenderHealth management's implementation of such remedial action, and will be responsible for notifying the contracting officer and the appropriate agency Inspector General of the information received and any resulting remedial action taken.

EngenderHealth will cooperate fully with any US Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to EngenderHealth facilities and staff.

EngenderHealth will protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and will not prevent or hinder these employees from cooperating fully with US government authorities.

5. Recruitment and wage plan

Detailed policies and procedures for employee recruitment and EEOC compliance are provided in the HR Policies and Procedures issued by the HR department. All employee recruitment is conducted with the involvement and approval of the Human Resources Department. EngenderHealth strictly prohibits the use of any misleading or fraudulent information in recruitment. In addition, a significant change in job duties or specifications after recruitment has begun will be considered a new position request, and the hiring process will cease. It will be the responsibility of the hiring manager to restart with a new requisition and job description.

For each position recruited by HQ, HR/HQ will complete a review of the content of the job description to ensure that the position is appropriately described based on level of responsibility and is properly graded within the job classification system for determination of salary range consistent with EngenderHealth job classifications. Salaries established for each position must reflect the relative internal value of the position to the organization, be commensurate with comparable organizations in the competitive labor market, and also take account of Labor costs and ensure EngenderHealth's cost-effectiveness.

For field-based local-hire positions, upon approval by the Senior Director or Vice President, all recruitment is handled locally according to local office policies and procedures, which are overseen by HR/HQ for consistency and fairness.

For positions recruited through a temporary staffing agency or other outside agent, EngenderHealth requires that the agency maintains their own Anti-Trafficking Policy compliant with Standard Provision

M20 and Title XVII of the National Defense Authorization Fiscal Year 2013. Agencies that do not comply with any of the provisions for any reason will not be eligible for business with EngenderHealth.

Requests for recruitment-related travel, such as expenses for candidates being brought to the New York office for interviews, must be discussed between the hiring manager and Human Resources in advance and are charged to the hiring manager's team. Charging employees recruitment fees is prohibited.

6. Housing plan

In situations where EngenderHealth provides housing to employees, the housing will meet host country housing and safety standards. The finance manager or their delegate in charge of the procurement visits sites for suitability and reviews all property leases, including housing for posted employees, prior to signing.

7. Compliance Plan

EngenderHealth ensures internal compliance with these provisions through the procedures described and referenced throughout this policy document. All operations are subject to this policy and it is strictly enforced across all EngenderHealth locations and activities. Any suspected violation reported to EngenderHealth or detected by HR or management will be investigated, acted upon, and reported per the provisions of this policy.

Compliance by sub-recipients, vendors, suppliers, and other agents is additionally ensured through a mandatory training program for all EngenderHealth staff administered by the Grants and Contracts Unit. Program and technical staff members who manage the sub-recipient and vendor relationships and deliverables will:

- Become aware of this policy and related terms and conditions in the contractual templates
- Learn how to assess the risk of trafficking in a given scenario and geographic location
- Analyze and apply the relevant terms and conditions in the contractual templates
- Draft and submit compliance monitoring plans for sub-recipients.

Per the terms of the contractual agreements all counter-parties must confirm their compliance before commencing work with EngenderHealth.

During the performance of their work, EngenderHealth will implement additional reporting, inspection, and/or site visits with the other parties as appropriate for the size and complexity of the contract, subcontract or subagreement with EngenderHealth and the nature of the activities to be performed under it. Any suspected violation reported to EngenderHealth or detected by HR or management will be investigated, acted upon, and reported per the provisions of this policy, including but not limited to:

- Requiring the party to remove an employee or agent from a project
- Requiring the party to terminate its relationship with any other contractor, consultant, supplier, subcontractor or subrecipient found to be in violation,
- Suspending payments to party until violation is remedied, and
- Immediately terminating the party's agreement, grant, or contract