

Public Health Institute (PHI) Anti-Trafficking Compliance Plan

I. Purpose

Pursuant to 22 U.S. Code § 7104a and “Trafficking in Persons” provisions included in PHI’s US Government-funded awards, PHI has developed this Anti-Trafficking Compliance Plan (“Plan”) for its covered US Government awards.

The purpose of this Plan is to set forth policies and procedures for PHI and the Program for: (1) making employees aware of the conduct prohibited under this policy and the corrective, preventive, and other actions that may be taken in response to actual or potential violations by employees; (2) employing fair recruitment, wage and housing practices; and (3) preventing prohibited trafficking activity by subcontractors, and subrecipients, and (4) monitoring, detecting, reporting on, and taking appropriate action regarding those who engage in such activities.

II. Applicability

This Plan applies to:

- Federally funded contracts and subcontracts that exceed \$550,000 and are performed outside the United States; (See [FAR 52.222-50](#))
- Certain federally funded awards and subawards that exceed \$500,000 and are performed outside of the United States, including USAID and Department of State. (See [22 UCS 7104a](#) and *Mandatory Standard Provision No. 20* and *USDA Standard Provisions*)

III. Employee Awareness

PHI and Program personnel employed under a covered award will receive a copy of this Plan via email. This Plan also is published on PHI’s website at: <https://www.phi.org/about/financials/>

Employees with specific questions on the Plan may direct their questions directly to their Principal Investigator/Program Director.

IV. Recruitment and Wage Plan

PHI and the Program prohibit the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. PHI and Program staff who are responsible for or involved in any step of the recruitment process must fully and accurately disclose, in a format and language accessible to the potential employee, all key terms and conditions of employment, including, as applicable, wages and benefits, work location, living conditions, housing and associated costs (when provided or arranged by PHI or the Program), and significant costs to be charged to the employee.

PHI and the Program only permit the use of recruitment companies with trained employees, prohibit charging recruitment fees to the employees or potential employees and ensure that wages meet applicable host-country legal requirements or will explain any variance.

PHI and the Program prohibit destroying, concealing, confiscating, or otherwise denying any employee access to his or her identity or immigration documents.

Housing and Transportation

In situations where PHI or the Program provides housing to employees, unless host country law provides for higher standards (in which case, those standards will apply), all such housing must meet host-country housing and safety standards.

PHI and/or the Program will provide or pay the cost of return transportation at the end of employment for any employee who is not a national of the country where the work took place and was brought into that country by PHI or the Program for purposes of working on a covered US Government award.

PHI and/or the Program will provide or pay the cost of return transportation at the end of employment for any employee who is not a US national and was brought into the US for purposes of working on a covered US Government award, if payment of such costs is required under existing temporary work programs or pursuant to a written agreement with the worker for portions of awards performed outside the US.

V. Other Prohibited Activities

PHI and Program employees and their agents will also not engage in any of the following prohibited activities:

- Engage in other severe forms of trafficking in persons. Severe forms of trafficking in persons is defined as (1) 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 (2) 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*, peonage, *debt bondage*, or slavery. Procure commercial sex acts, which means any sex act on account of which anything of value is given to or received by any person.
- Use forced labor in the performance of any activities. "Forced Labor" means any labor obtained by any of the following methods: the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

VI. Subcontractor and Subrecipient Compliance

All applicable PHI subcontractors and subrecipients as described in Section II above must agree to comply with the Plan and all applicable Anti-Trafficking Provisions. PHI will include language to that effect in all applicable subcontracts and sub-awards and will require a certification at the time of the award and the duration of the agreement:

- That the subcontractor or subrecipient has implemented a compliance plan and has complied with its plan; and
- That after conducting due diligence, to the best of the subcontractor's or subrecipient's knowledge and belief, neither it nor any of its employees, or its subcontractors, subrecipients or their employees, have engaged in any prohibited trafficking-related activities, or if any abuses relating to prohibited trafficking-related activities have been found, the subcontract or subrecipient has taken appropriate remedial and referral actions.

PHI, in coordination with the Program, will monitor and audit compliance with this Plan and prioritize based on risk. If any subcontractor or subrecipient fails to comply with this Plan or applicable Anti-Trafficking Provisions, PHI, with support of the Program, will take appropriate action to remediate the violation and prevent future violations, which may include:

- Requiring the subcontractor or subrecipient to remove an employee or agent from a project;
- Requiring the subcontractor or subrecipient to terminate its relationship with any Supplier subcontractor, or subrecipient;
- Suspending payments to the subcontractor or subrecipient until violation is remedied; and/or
- Immediately terminating the subcontract or subaward.

VII. Reporting Requirements and Procedures

All PHI and Program personnel should report any suspected trafficking-related activity or violation of this policy immediately to their PHI supervisor. The PHI supervisor should review the report with their Principal Investigator/Program Director to determine appropriate next steps, including notification to the Office of Chief Legal Counsel. PHI will investigate all credible reports of prohibited trafficking-related activity or violations of this policy and take appropriate action.

PHI personnel may also contact PHI's help and hotline by any of the following methods:

- File a web report at: www.phi.ethicspoint.com
- File a report on your mobile device at www.phimobile.ethicspoint.com
- Call Toll-free at 833.765.8129

Reports also can be made directly to the US Government funding agency point of contact and/or the agency's Office of Inspector General.

PHI personnel and subcontractor or subrecipient Personnel who believe they or others have been subjected to prohibited trafficking-related activities also may contact the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

Further, the National Human Trafficking Hotline is a 24-hour, confidential, multilingual hotline covering more than 200 languages for victims, survivors, and witnesses of human trafficking.

- The hotline number is [1-888-373-7888](tel:1-888-373-7888)
- Text "HELP" to 233733
- Live chat at humantraffickinghotline.org.
- Email help@humantraffickinghotline.org

PHI prohibits retaliation against any PHI employee who reports prohibited trafficking-related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports. PHI personnel who engage in any form of retaliation against those who report prohibited trafficking-related activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment with PHI.

VIII. Annual Certifications

PHI will submit certifications annually or as otherwise required by the sponsoring agency in a manner and format as determined by the agency.

IX. Implementation and Enforcement

PHI may take appropriate action in response to actual or potential violations by employees, including additional oversight of program or project operations, discipline and/or termination of staff as may be appropriate, and restriction of organizational permission to engage in and support for activities subject to this policy.