

# Anti-Trafficking and Modern Slavery Statement and Compliance Plan

## 1. Introduction

RI has zero tolerance for modern day slavery and human trafficking. This statement is made pursuant to the U.S. Government's laws, regulations, and policies that prohibit trafficking in persons, including Executive Order 13627, "Strengthening Protections Against Trafficking in Person in Federal Contracts"; FAR Subpart 22.17; FAR 52.222-50; FAR 52.222-56; USAID's Standard Provisions regarding Trafficking in Persons; the U.K. Government's Modern Slavery Act and constitutes our endeavors to ensure that RI's operations and supply chains are free from slavery and human trafficking

## 2. Relief International Organizational Structure

Relief International (RI) is an alliance of non-profit humanitarian aid and development organizations: Relief International, Inc. (US), Relief International – UK, Relief International – Europe (Belgium), and MRCA/Relief International – France. Our mission is to partner with people in vulnerable communities to achieve relief from poverty by supporting their response to crises, building their resilience to disasters and emergencies, and promoting dignity and the long-term well-being of people in the communities that we serve. Relief International serves communities in Africa, Asia, and the Middle East.

## 3. Business and Supply Chain

RI operates through both direct implementation as well as contracting with both local and international for profits and non-profits and INGOs, CSOs, private companies, and host governments. In order to meet the objectives under RI's awards, RI works with suppliers and subrecipients across all levels of our activities. RI recognizes that it works with populations and in settings and supply chains where trafficking in human and modern slavery are active and therefore must have explicit policies and vigilant procedures to combat TIP and modern slavery.

## 4. Risk Assessment and Due Diligence

At the global level, RI actively maintains an organizational Risk Register which is reviewed quarterly by the Senior Management Team and Boards of Trustees. This includes a key risk relating to safeguarding the wellbeing of communities that work with RI, including trafficking in human. A wide range of safeguarding risk mitigation measures are in place and progress is actively monitored and managed ongoing. Additionally, RI is in the process of rolling out enhanced Safeguarding Risk Assessment process across the organization that allows for us to undertake detailed due diligence of our own and our

partner's safeguarding policies and procedures, their arrangements for reporting concerns and their ability to implement safeguarding and Do No Harm measures relevant to human trafficking and modern slavery.

As part of RI's commitment to identify and mitigate potential risks in suppliers' and subrecipients' operations, RI undertakes a process of due diligence prior to issuance and signing of vendor agreements and sub-agreements with entities proposing to work on behalf of RI.

In implementation of RI's supply chain and issuance of sub-agreements, RI follows the regulatory guidelines based on the US Government Trafficking in Persons wording in all commodity and consultant contracts as well as integrating Modern Slavery Act requirements into UK-funded awards. RI requires its vendors to prohibit activities directly related to modern day slavery and trafficking in persons. Additionally, it requires entities to report any credible violations to RI and cooperate with any investigations or corrective actions.

Where RI believes that a supplier or subrecipient is involved in modern slavery or human trafficking, RI will take steps to investigate in accordance with policies and take appropriate actions. In 2021, RI began to integrate safeguarding discussions and policy reviews with sub-recipients before signing new awards to ensure compliance with donor requirements and RI's standards. These reviews will continue and expand in 2022.

RI is committed to continue taking actions which affirm its zero-tolerance approach to modern slavery. In an ongoing effort to improve compliance around modern slavery and human trafficking requirements, in 2021 RI is undertaking a further review of the risks in its supply chain and with its subrecipients and will assess any areas where risk mitigation around modern slavery can be enhanced.

## **5. Policies**

RI has zero tolerance regarding all aspects of modern slavery and human trafficking practices. RI will not tolerate any forms of abuse or modern-day slavery or trafficking in its work or supply chains and has incorporated preventive measures into its policies guiding proper behavior and procedures for RI personnel and into our vendor and sub-agreement templates. Among these policies are the RI Employee Code of Conduct, Contractor/Supplier/Vendor Terms and Conditions, and Partner Code of Conduct Certifications.

All RI personnel are expected to follow and uphold the policies above as well as the local and international laws that apply to RI's work. RI's Employee Code of Conduct must be signed by all staff which includes specifics on anti-trafficking in persons, child protection, and preventing sexual exploitation and abuse in all its forms.

## **6. Anti-trafficking in Persons Compliance Plan**

RI's anti-trafficking in persons compliance plan covers: awareness raising and training, process for reporting, recruitment and wage plan, housing, and procedures to prevent agents (all forms of vendors) and subrecipients from engaging in trafficking and the consequences if TIP violations are found.

**Awareness and Training:** RI's awareness program includes personnel, vendor, and subrecipients being informed in writing and required to sign that they understand and adhere to trafficking in persons (TIP) plan requirements which include: what constitutes TIP/Modern Slavery, duty to report and how and where to report, specifics on requirements around use of recruitment agents and housing standards if included with employment. All RI staff will acknowledge receipt and understanding of RI Combating Trafficking in Persons Policy and accompanying resources upon hire and annually when they complete the Code of Conduct training. RI employees are responsible for complying with this policy as well as completing any associated training mandated as a condition of continued employment. When engaging outside parties, RI staff will ensure that the requirements of this policy are communicated to RI sub-awardees, independent contractors, and vendors. Personnel are required to take annual training on TIP. If vendors and subrecipients require access to training this is also made available to them.

**Reporting:** RI's Combatting Trafficking in Persons Policy and Code of Conduct detail the expectations and procedures for reporting any information on suggested violations of the Combatting Trafficking in Persons Policy and other safeguarding policies. Employees and other affiliated actors may report concerns about modern slavery and / or human trafficking ,without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons, including a means to make available to all employees the hotline phone number of the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at [help@befree.org](mailto:help@befree.org) and to supervisors, managers or team leaders, as well as via the incident reporting channels:

- Incident Form: [bit.ly/RIIncidentsHotline](https://bit.ly/RIIncidentsHotline)
- Email: [incidents@ri.org](mailto:incidents@ri.org)
- Phone: +1 (434) 288-0202

Confidentiality of Incident Reporting in line with RI's Whistleblowing Policy, reports of suspected cases of human trafficking may be submitted either on a confidential basis or anonymously. Reports will be kept confidential to the greatest extent possible, consistent with the need to conduct an adequate investigation. Providing reports of suspected human trafficking are made in good faith, staff and associates will be protected from harassment, retaliation, or adverse employment consequence. However, disciplinary action may be taken against anyone who is judged to have made a malicious allegation. For further details, please see RI's Incident and Reporting Management Policy.

**Recruitment and wage plan:** RI usually does not use recruitment companies. If a recruitment company is used it must be vetted by and approved at GSO level, with final approval coming from the CEO. Use of recruitment companies must have trained employees with explicit expertise in TIP, prohibits charging recruitment fees to the employees or potential employees and ensures that wages meet applicable host-country legal requirements or explains any variance.

**Housing plan:** if RI or any of its subrecipients or agents/vendors intends to provide or arrange housing, RI will ensure that the housing meets host-country housing and safety standards.

## 7. Measuring Effectiveness and Submission of Annual Certification on TIP Compliance Plan

RI's global and country-level Human Resource departments track the completion of required human trafficking and modern slavery awareness trainings for RI employees on an annual basis. Additionally, the Global Risk and Assurance department logs, classifies and tracks the management of incidences reported through the global incident reporting system, including reported violations of RI's Human Trafficking Policy and other safeguarding policies. RI will administer ongoing anti-trafficking and modern slavery monitoring and complete annual certification of compliance to anti-trafficking and modern slavery monitoring plan.

## **8. Statement and Plan Governance**

This policy was approved by the Relief International, Inc. (US) Board of Directors on March 9, 2021, Relief International UK Board of Directors on March 9, 2021 MRCA/Relief International-France Members of the Association on March 9, 2021, and Relief International Europe (Belgium) Members of the Association on March 9, 2021. This policy may only be amended or changed with the approval of the Board(s)/Members.