

# Anti-trafficking in Persons COMPLIANCE PLAN



Mekong Strategic Capital (MSC) has a zero-tolerance policy regarding any MSC employees, consultants, volunteers, or third party or any person who works with MSC in any country and at any level engaging in any form of trafficking in persons or forced labor.

This compliance plan conforms to our partners' requirements and establishes MSC's procedures for preventing trafficking in persons through awareness, reporting, and recruitment.

## **Awareness Efforts**

MSC's Combating Trafficking in Persons Policy (policy) reflects all of the requirements stemming from our contractual and ethical obligations to the people we serve. The policy includes all of USAID's Anti-Trafficking Provisions and actions MSC may take against employees or others who violate the policy, and procedures for reporting and investigating violations.

All MSC staff have been informed via email of the trafficking-related prohibitions and actions that will be taken for violations. All MSC staff have access to our policy, plans, and related materials through our internal filing and through informational sheets in our offices.

MSC conducts Anti-trafficking in Persons Compliance training for all staff approximately annually and as new staff are hired throughout the year. This training certifies that staff understand trafficking issues and agree to comply with the policies, procedures, and principles of MSC's Combating Trafficking in Persons Policy, including reporting any violations of which they are aware. Such compliance training is tailored as appropriate for the nature and scope of the activities to be performed.

## **Reporting Process**

All MSC staff have a responsibility to report, without fear of retaliation, any activity that violates the Combating Trafficking in Persons Policy to an MSC partner. In addition, staff may report through the Global Human Trafficking Hotline via telephone (1-844-888-FREE) or e-mail ([help@befree.org](mailto:help@befree.org)). MSC staff are encouraged to consult the above mentioned points of contact if they are uncertain whether a specific action would be in violation of the Combating Trafficking in Persons Policy.

## **Recruitment and Wage Plan**

To the extent that MSC uses recruitment companies, only recruitment companies with trained employees may be used, no recruitment fees may be charged to employees, and all wages must meet applicable cooperating country legal requirements.

MSC prohibits destroying, concealing, confiscating, or otherwise denying any employee access to her or his immigration documents.

**Housing Plan**

MSC ensures that housing provided directly or through third-party entities for all staff meets host country housing and safety standards.

**Procedures for Vendors**

All MSC vendors for U.S. Government-funded awards where the work will be performed outside of the United States and with a value of more than US\$500,000 must provide MSC with an anti-trafficking in persons compliance plan and, as required by U.S. law, a certification that their staff and contractors at any tier have not engaged in trafficking-related activities.

MSC includes all applicable requirements in the contracting documents sent to our vendors. Vendors are also provided links to the MSC Combatting Trafficking in Persons Policy and are asked to certify that they have read and understood these documents. A copy of vendor certifications are kept on file by MSC.

Failure to comply with the requirements of the Combatting Trafficking in Persons Policy or the anti-trafficking in persons compliance plan is grounds for MSC to take any and all appropriate actions, up to and including immediate termination of that vendor's contract with MSC.

For the purposes of each required compliance plan, "staff" means an individual engaged in the performance of the contract as a direct employee, consultant or volunteer of the vendor.

**Country Office Plans**

Consistent with award requirements, MSC will develop and implement country plans that address award-specific challenges and reflect any unique country context in combating trafficking in persons, as needed.

**Questions**

Questions regarding MSC's Combating Trafficking in Persons Policy and this compliance plan may be directed to John McGinley ([jm@mekongstrategic.com](mailto:jm@mekongstrategic.com)).