

Anti-trafficking in Persons COMPLIANCE PLAN



Mekong Strategic Partners (MSP) has a zero-tolerance policy regarding any MSP employees, consultants, volunteers, or third party or any person who works with MSP 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 MSP's procedures for preventing trafficking in persons through awareness, reporting, and recruitment.

Awareness Efforts

MSP'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 MSP may take against employees or others who violate the policy, and procedures for reporting and investigating violations.

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

MSP 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 MSP'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 MSP staff have a responsibility to report, without fear of retaliation, any activity that violates the Combating Trafficking in Persons Policy to an MSP partner. In addition, staff may report through the Global Human Trafficking Hotline via telephone (1-844-888-FREE) or e-mail (help@befree.org). MSP 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 MSP 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.

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



Housing Plan

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

Procedures for Vendors

All MSP 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 MSP 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.

MSP includes all applicable requirements in the contracting documents sent to our vendors. Vendors are also provided links to the MSP 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 MSP.

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

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, MSP 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 MSP's Combating Trafficking in Persons Policy and this compliance plan may be directed to John McGinley (jm@mekongstrategic.com).