

ICF “AIDS Foundation East-West (AFEW-Ukraine) Anti-Human Trafficking Compliance Plan

Purpose

In accordance with AFEW-Ukraine’s Human Trafficking and Worker Exploitation Policy, AFEW-Ukraine prohibits its staff, and implementing partners, including sub-grantees and consultants from engaging in any form of human trafficking or forced labor.

AFEW-Ukraine is committed to protecting workers and responding promptly and appropriately to any allegations of trafficking incidents. This plan establishes AFEW-Ukraine’s procedures for preventing human trafficking through awareness, reporting, recruitment and wage plans, housing plans, subaward compliance, and investigations.

Awareness Efforts

AFEW-Ukraine’s resources related to combatting human trafficking and worker exploitation are available to our workers at any time via corporate drive that contains information about policies and procedures for staff use and reference. The plan is shared with all employees and staff is reminded about the policies or procedures on a regular basis

All employees are informed about Anti-Human Trafficking policy as it is issued or any revisions to the policy are issued. For new employees the policy is a part of general orientation, and the policy is a part of general AFEW staff manual. During annual office meetings the employees are reminded about policies and procedures, and informed about the process of reporting any violations.

Reporting Process

All AFEW-Ukraine workers and subrecipients must report any suspicions or allegations of human trafficking or non-compliance with the Human Trafficking and Worker Exploitation Policy to AFEW-Ukraine’s Complaint Focal Point:

Joost van der Meer, Chair, AFEW-Ukraine Chair of Supervisory Board
[vandermeerj\(at\)phesta.nl](mailto:vandermeerj(at)phesta.nl)

Reporting of human trafficking cases from implementing partners and staff of AFEW may be also done via Pact’s hotline at pactworld.ethicspoint.com

Reports may also be made through the Global Human Trafficking Hotline via telephone (1-844-888-FREE) or e-mail (help@befree.org).

AFEW-Ukraine is required to report any violations of this policy to the funder or prime implementing partner.

Reports may also be made through the Global Human Trafficking Hotline via telephone (1-844-888-FREE) or e-mail (help@befree.org). If AFEW-Ukraine employees report incidents to these

outside sources, they should also report internally so that appropriate action can be taken to address the incident for the organization.

Any violations of the Human Trafficking and Worker Exploitation Policy must be reported to the funder.

Implementation

Recruitment and Wage Plan

In all hiring practices...

- AFEW Ukraine abides by local labor laws.
- AFEW-Ukraine workers are prohibited from charging recruitment fees to any candidate as a condition of their prospective employment at AFEW-Ukraine
- AFEW-Ukraine workers should not solicit any candidate for purposes of employment using false or fraudulent pretenses, representations, or promises regarding that employment.
- AFEW-Ukraine workers are prohibited from keeping, concealing, or destroying an employee's identity or immigration documents.

Housing Plan

AFEW-Ukraine does not provide or arrange any housing for employees.

Assessing Risks at the Project Level

Management team - Executive Director and Financial Director of AFEW Ukraine are responsible for identifying, mitigating, and monitoring specific trafficking risks in their programs related to programming and country challenges. This includes, but is not limited to conducting due diligence and certification requirements for all organizations, vendors, suppliers or other third parties to ensure they do not partake in any trafficking activities. If any employee of AFEW Ukraine believes that any parties are a higher risk, they should immediately notify Management Team.

Subrecipients' failure to comply with the requirements of our policy or compliance plan could result in immediate termination of their subaward.

Specific Obligations for USAID Projects

AFEW-Ukraine must keep in mind that for USAID-funded awards there is a requirement for annual certification. This requirement applies to USAID awards with performance outside of the United States and with an estimated value that exceeds \$500,000. The certification must be submitted to USAID or prime implementor and state that AFEW-Ukraine has implemented this compliance plan and are not engaged in any trafficking-related activities. Likewise, USAID subrecipients and subcontractors with a subaward or subcontract value that exceeds \$500,000 are required to annually certify to AFEW-Ukraine that they have implemented a compliance plan and are not engaged in any trafficking-related activities.

Questions

Questions regarding this plan or the Human Trafficking and Worker Exploitation Policy should be addressed to Olena Voskresenska, Elena.voskresenskaya@afew.org.ua