

Harirod Group of Companies Trafficking in Persons Compliance Plan

Trafficking in Persons Policy

Harirod Group of Companies (“HARIROD”) has a robust compliance and ethics program aligned with our corporate values, particularly our dedication to enabling children to achieve their full potential and ensuring their overall well-being in a protective and conducive environment.

In September 2015, HARIROD formally adopted a zero tolerance policy regarding trafficking in persons (TIP). Plan’s leadership understands the importance of counter-trafficking initiatives and has devoted sufficient resources to ensure compliance. The Compliance, Operations, and Awards Unit has led the organization’s efforts to draft the policy in the wake of updated Federal Acquisition Regulations.

In summary, the policy prohibits individuals from:

- Engaging in trafficking in persons
- Procuring commercial sex acts
- Using forced labor in the performance of the award
- Directly supporting or advancing trafficking in persons

HARIROD’s TIP policy does not distinguish between severe and non-severe forms of TIP activities, and therefore its employees are held to the highest standard of not engaging in or supporting any form of trafficking.

HARIROD’s compliance plan consists of four pillars: awareness, prevention, recognition, and reporting.

Applicability

HARIROD’s TIP policy applies to all employees, including direct employees, consultants, and volunteers. It also applies to sub recipients whose contracts are valued at over \$500,000.

Where applicable, HARIROD includes the relevant FAR/CFR clauses in all subcontracts/sub agreements with sub recipients and recruiting agents.

Harirod’s Business Development Unit (BDU) will share the responsibility of (1) ensuring that counter-trafficking policies are known to third parties, (2) vetting third parties, and (3) obtaining certifications from third parties at the proposal stage. Third parties include suppliers, sub awardees, and recruiting agents.

Responsibility to Keep Children Safe

As one in four trafficking victims are children, this new TIP policy complements HARIROD’s longtime Child Protection Policy, *Say Yes! To Keeping Children Safe*. Harirod believes that in a world where children face so many threats of harm, especially in Afghanistan, it is our duty to ensure that we, as an organization, do not contribute in any way to harming or placing children at risk. Our Child Protection Policy provides the framework for the organization’s responsibility to keep children safe, ensuring that no child comes to harm as a result of their engagement with us, whether that be via their interaction with staff and those who represent us, or their participation in our programs, sponsorship, activities, and fundraising or advocacy campaigns.



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HARIROD strives to create a professional culture where all employees are aware of issues that face children in the countries where we work, affirmatively prevent harm and protect children, and report concerns so that HARIROD may effectively respond. As part of our strategy, we tackle excluded and marginalized groups to work towards rights for every child. We anticipate that employees will easily adapt to compliance with the new TIP policy, which similarly promotes: (1) awareness, (2) prevention, (3) recognition, and (4) reporting.

Trafficking in Persons Compliance Plan

Awareness – All Harirod Group of Companies employees will be required to attend a training event introducing the policy and promoting awareness of trafficking activities. As a result of the training, attendees will be able to define trafficking in persons; identify where TIP occurs around the globe; describe the roles and motivations of parties involved in TIP; understand the legal framework governing TIP; state what USG clients expect from HARIROD employees to combat TIP; explain HARIROD’s TIP compliance policy; and know the steps to prevent, recognize, and report trafficking activities. This program will be offered every six months in Harirod offices, and will be mandatory for employees hired in that timeframe.

HARIROD presently has 04 country offices (COs) in four regions. It is our goal to conduct the awareness training in each CO once a year. Employees of sub recipients whose funding exceeds \$500,000 will also be invited and encouraged to attend the training. Presently the training is only available in English; however, it is our goal to have the presentations translated into Dari and Pashto and to train TIP trainers to conduct the awareness training in these languages by the end of FY 2017.

Prevention – The Compliance, Operations, and Awards (COA) team at Harirod Group of Companies will be responsible for keeping abreast of local labor law and coordinating with COs to ensure compliance therewith. Sub recipients, partners, and suppliers will be screened for compliance.

Harirod Group of Companies already has several standards and controls in place to ensure compliance with the TIP policy, including the Ethics Code of Conduct. The Human Resources (HR) team has recruitment policies that prohibit the use of any fraudulent or misleading recruitment practices. Harirod Group of Companies does not charge recruitment fees to any candidate. Employees hired in COs are paid per established salary ranges that meet or exceed local labor law. All employees are presented a written employment contract in the official language of the country. When HARIROD hires a third-country national (TCN) or U.S. expatriate to work in a CO, these employees are provided Fly America compliant round-trip transportation costs.

As a general rule, HARIROD provide accommodation to employees at own premises and will ensure that all accommodations meets the country safety standards. This determination will be made by the CO Security Officer.

Harirod Group of Companies and CO staff in grants, finance, and procurement, shall screen all sub recipients, consultants, and suppliers to ensure that they do not appear on the USG Excluded Parties List (sam.gov), the UN Consolidated List, or the OFAC Sanctions List (U.S. Department of Treasury). During the course of a sub award, the HARIROD CO grants, finance, and procurement staff conducts regular audits of sub recipient offices.

Recognition – Harirod Group of Companies is committed to working only with sub recipients and vendors that adopt a zero-tolerance policy when it comes to Trafficking in Persons. As part of the awareness training, employees will be trained to recognize trafficking in its various forms. Project staff will provide monitoring and oversight of project sites to ensure that project activities in no way—directly



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or indirectly—support trafficking activities. HARIROD will review compliance plans submitted by sub recipients (where required), provide feedback, and monitor for compliance.

Reporting – It is a priority of HARIROD that it and its employees act ethically and legally. It is therefore very important that any illegal activity or violations of the Trafficking in Persons Policy be promptly brought to the organization’s attention. All HARIROD employees, sub recipient employees, and suppliers are required to report suspected trafficking-related activity to HARIROD.

Reporting may be made in one of several ways:

- (1) Any supervisor in his/her reporting line
- (2) A member of the Executive Team
- (3) The President
- (4) Senior Compliance Officer, Manager Operations, and Awards
- (5) Ethics and Compliance Officer at hr@harirod.af Mobile 0093797797022
- (6) Global Trafficking hotline 1-844-BE-FREE help@befree.org

An employee who has any questions regarding this Code or its application to a particular situation should discuss these concerns with any of the persons listed above. HARIROD employees may report illegal acts or a violation of this policy anonymously. However, anonymous reports must contain enough detailed information to permit the organization to investigate.

It is HARIROD’s policy to promptly and appropriately investigate reports of illegal activity or violations of the Trafficking in Persons Policy. HARIROD employees must cooperate with these investigations. It is a violation of this policy for HARIROD employees to prevent, hinder, or delay discovery and full investigation of illegal acts or violations of this Code. To the extent practicable under the circumstances, HARIROD will take reasonable precautions to maintain the confidentiality of those individuals who report illegal activity or violations of this Code and of those individuals involved in the alleged improper activity, whether or not it turns out that improper acts occurred.

No reprisals or disciplinary action will be taken or permitted against employees for good faith reporting or cooperating in the investigation of illegal acts or violations of this policy. It is a violation of this policy for any HARIROD employee to punish or conduct reprisals against another employee for making a good faith report or cooperating in the investigation of illegal acts or violations of the TIP Policy. Employees who violate the policy or commit illegal acts are subject to disciplinary action up to and including termination. Employees who report their own illegal acts or improper conduct, however, will have such self-reporting taken into account in determining the appropriate disciplinary action.

Supply Chain Accountability

Each USG-funded project valued at greater than \$500,000 will draft its own plan for compliance with the counter trafficking policy. These plans will take into account the size and complexity of the award, nature and scope of activities to be performed, number of non-U.S. citizens expected to be employed, and the risk that the award will involve services or supplies susceptible to TIP. These plans will include a wage plan and, if applicable, a housing plan.

A supplier or sub recipient’s award may be suspended or terminated for violation of the TIP policy.



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Acknowledgement of Anti-Trafficking Policy

I, _____, have reviewed Harirod's Anti-Trafficking Policy.

I acknowledge that Harirod, its Employees, Consultants, and Implementing Partners may not engage in or support trafficking in persons, including trafficking-related activities. I understand that I have an obligation to immediately report directly to Harirod or to the Global Human Trafficking Hotline any conduct that appears to be a violation of this policy.

I understand that my failure to comply with this policy, including its reporting requirements, will subject me to disciplinary action, up to and including termination.

I understand that contracts may have additional country-specific requirements, depending on the place of performance and I will comply with these specific restrictions.

I agree to comply with the Harirod Anti-Trafficking Policy and acknowledge my responsibilities under this policy.

Signature _____

Printed Name _____

Date _____