



Anti-Trafficking in Persons Compliance Policy

The Pan American Development Foundation (PADF) has developed an Anti-Trafficking in Persons Compliance Plan (“Plan”) in accordance with the U.S. Government’s zero-tolerance policy regarding trafficking in persons by government contractors and award recipients, as set out in FAR Subpart 22.17 and 52.222-50, USAID Standard Provision M20 for U.S. Non-governmental Organizations “Trafficking in Persons,” and Department of State Standard Terms and Conditions XXXII “Trafficking in Persons”. The Plan can be found on our internal shared drive. In addition to being in its Code of Conduct, PADF posts this Policy on its external website, www.padf.org, and at all workplaces.

The purpose of the Plan is to: (1) set out PADF’s anti-trafficking in persons policies and procedures; (2) make PADF employees aware of the conduct prohibited under PADF policy and the Federal Anti-Trafficking in Persons Provisions and the actions that may be taken against employees for violations; (3) employ fair recruitment, wage and housing practices; (4) inform PADF employees of processes available for them to report without fear of retaliation any activity inconsistent with PADF’s anti-trafficking in persons policy; (5) prevent prohibited trafficking activity by suppliers, sub-contractors and sub-recipients, and monitor, detect and terminate those who engage in such activities; and (6) establish PADF reporting requirements and remediation procedures.

PADF strictly prohibits its employees, all subcontractors, all subawardees and agents from:

- engaging in trafficking in persons;
- procuring commercial sex acts;
- using forced labor;
- destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents;
- soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations or promises regarding that employment;
- using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- charging employees recruitment fees;
- failing to provide return transportation or pay for return transportation costs to an employee from a country outside the US to the country from which the employee was recruited upon the end of employment if requested by the employee; and
- providing or arranging housing that fails to meet the host country housing and safety standards.

PADF employees who engage in any of the prohibited acts will be disciplined, up to and including dismissal. PADF will take appropriate action up to and including termination of its agreements with any subcontractors, subawardees or agents who engage in any of the prohibited acts.

All employees of PADF or its suppliers, subcontractors and agents are encouraged to report any activity or condition that may violate PADF’s Anti-Trafficking in Persons Policy or the requirements of USAID and Department of State (DOS) regulations, confidentially and without retaliation, to the Human Resources Department, the Chief Operating Officer, or the Whistleblower Hotline. This is also available for employees to report any workplace concern or potential violation of the terms and conditions of their employment contracts. All reported concerns will be promptly investigated by HR and the Chief Operating Officer. Additionally, PADF will not retaliate or interfere with employees cooperating with government authorities.

Employees may also report their concerns directly to the Global Human Trafficking Hotline at 1-844-888-FREE or its email address at help@befree.org. This hotline and email address, as well as the PADF Anti-Trafficking in Persons Compliance Plan, Policy, and reporting process, are given to all employees at the time of hire, and annually, and via postings in all worksites.