

## Preventing Trafficking in Persons Compliance Plan: Afghanistan ACEP

### **POLICY**

ICNL is opposed to all forms of trafficking in persons and is committed to mitigating the risk of trafficking in persons in connection with its operations and programs. It is the policy of ICNL to comply fully with the provisions of our cooperative agreements regarding Trafficking in Persons.

### **AWARENESS PROGRAM**

ICNL implements the Afghanistan ACEP project through employees assigned to the ICNL Washington office and to ICNL's office (housed within the offices of Counterpart International) in Kabul, Afghanistan. All ICNL employees working on the Afghanistan ACEP project will be informed about the activities prohibited by the provisions of our cooperative agreements regarding Trafficking in Persons, the reporting system, and the actions that will be taken against the employee or consultant for violations. ICNL will share the Global Human Trafficking Hotline (1-844-888-FREE) and the e-mail address [help@befree.org](mailto:help@befree.org) with all employees and consultants.

### **REPORTING MECHANISM**

Issues related to trafficking in persons will be reported using the procedures outlined in ICNL's Whistleblower Policies. Upon receipt of credible information regarding the commission of a prohibited activity relating to trafficking in persons, ICNL will notify the USAID Agreement Officer and the USAID Office of the Inspector General, and will fully cooperate with any Federal agencies responsible for audits, investigations, or corrective actions relating to trafficking in persons.

### **RECRUITMENT AND WAGE PLAN**

ICNL contracts with two consultants, one of whom is based in Kabul, Afghanistan, and one of whom is based in Delhi, India. ICNL is not working with recruitment companies, and ICNL does not charge any recruitment fees. ICNL ensures that all wages in Afghanistan meet host country legal requirements.

### **HOUSING PLAN**

In the Afghanistan ACEP program, housing is not arranged or provided for ICNL staff.

### **SUBAWARDEES**

ICNL has no subawardees in the Afghanistan ACEP project.

### **MONITORING**

ICNL monitoring of adherence to this compliance plan are to take place through remote monitoring of ICNL's local legal advisor.

### **REMEDIATION**

Where misconduct is uncovered through individual reporting, an internal investigation, third party audit, or otherwise, the misconduct is remedied through corrective action.