

Anti-Human Trafficking Compliance Plan

Mekong Sustainable Manufacturing Alliance

Institute for Sustainable Communities (ISC)

This document outlines ISC's Anti-Human Trafficking Compliance Plan and the Mekong Sustainable Manufacturing Alliance's (MSMA) procedures to prevent any agents from engaging in the trafficking of persons.

Compliance Plan

ISC condemns all forms of human trafficking. ISC will strictly comply with all applicable laws and regulations regarding the prevention of human trafficking and will cooperate with law enforcement authorities to address any such instances of exploitation to which ISC or its employees have become a party. ISC strictly prohibits its directors, officers, employees, partners (including but not limited to grantees, contractors, subcontractors, or their employees), agents representing or acting on behalf of ISC to engage in, or be a party to, trafficking in persons, procurement of a commercial sex act, use of forced labor; or acts that directly support or advance trafficking in persons. ISC prohibits any person(s) to enter into, on behalf of ISC, or otherwise, any business relationships or any other arrangements with any organization or persons which participate in any way in human trafficking. This plan establishes ISC's procedures for preventing human trafficking through awareness, reporting, recruitment and wage plans, housing plans, and suppliers' compliance.

Employee awareness

ISC's resources related to combating human trafficking and worker exploitation are referenced in our Human Resources Policy Manual and available on our internal intranet platform. All ISC employees are required to read and acknowledge ISC's policy manual, which includes a statement regarding TIP and references *USAID's Standard Provisions for U.S. Nongovernmental Organizations: A Mandatory Reference for ADS Chapter 303 (July 2015)*. An ISC statement related to combating human trafficking and worker exploitation is available on the ISC website for all staff use and reference.

Reporting

All ISC employees and partners must immediately report any suspected or intended human trafficking-related activity or violation of this policy directly to ISC's Vice President of People and Culture, either verbally or in writing, at 535 Stone Cutters Way, Montpelier VT 05602, (802) 229-2900, including by email via HR@sustain.org. Reports may also be made through the Global Human Trafficking Hotline (1-844-888-FREE or help@befree.org). ISC People and Culture staff will investigate all reports of human trafficking-related activity or violations of this policy and take appropriate action. ISC prohibits retaliation or threats of retaliation against anyone who reports prohibited activity or violations of this policy. Failure to report any actual or potential human trafficking-related activity or violations of this policy may subject employees to disciplinary actions, up to and including termination of employment.

Recruitment and wages

ISC prohibits the use of any misleading or fraudulent recruitment practices. In all recruiting, ISC complies with the following hiring practices. ISC abides by local labor laws. ISC does not charge recruitment fees to any candidate as a condition of their prospective employment. ISC hiring managers should not solicit employment candidates using false or fraudulent pretenses, representations, or promises regarding that employment. And to the extent that ISC uses recruitment companies, only 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. ISC requires all recruitment companies to comply with all labor laws.

Housing

Generally, ISC does not provide housing to its employees. In situations where ISC provides housing to employees, the housing must meet host country housing and safety standards.

Supplier compliance

ISC's standard contract and subaward agreements contain human trafficking and whistleblower protection clauses, and all ISC's contractors, consultants, vendors, suppliers, subcontractors, and sub-recipients must agree to comply with applicable anti-human trafficking provisions.

Project-specific actions

In the U.S. Government-funded awards with an estimated value that exceeds \$500,000, ISC is required to annually certify to USAID that they have implemented a compliance plan and are not engaged in any human trafficking-related activities.

ISC's Vice President of Global Programs may delegate local responsibilities, including identifying, mitigating, and monitoring specific human trafficking risks, to a chief or party, country director, or another responsible senior manager in locations where ISC works, but the Vice President will hold final responsibility to ensure that human trafficking is addressed across ISC's programs. This includes conducting due diligence on partners and vendors to ensure ISC is not working with entities involved in human trafficking activities.

MSMA-specific work with program partners and participants

In MSMA, ISC engages with the following non-government entities: 1) providers of training, technical assistance, coordination, and other services; 2) participants in training workshops, peer learning events, and exchanges; and 3) factories supported for technical assistance projects that generate practical lessons for low carbon development implementers region-wide.

1. Providers of Training, Technical Assistance, Coordination, and Other Services

Specific partners, including the examples listed below, provide MSMA curriculum development and/or training of trainers: Alliance Anti Traffic, Sumerra, the Centre for Child Rights and Business, and the Vietnam Chamber of Commerce and Industry. MSMA will follow procurement policies 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(h), and in USAID

Standard Provision M20 for U.S. Nongovernmental Organizations (“Anti-Trafficking Provisions”). As noted, all ISC contracts include a provision prohibiting human trafficking by the contractors or any of their employees. In addition, prior to making any procurement commitments, ISC will also use the System for Award Management to vet potential contractors.

2. Participants in Training Workshops, Peer Learning Events, and Exchanges

Non-government entities may join as participants in working groups, training sessions, peer learning events, and exchanges. As such, they will acquire knowledge and skills, but they will not be compensated for their participation. Illustrative participants are listed below.

Participation in:	Illustrative Participants	
Alliance Leadership Working Groups	<ul style="list-style-type: none"> ● Amazon ● Carter’s ● Calares ● Kathmandu 	<ul style="list-style-type: none"> ● Levi’s ● REWE Far East Limited ● Ripcurl ● Unilever
Training Sessions	<ul style="list-style-type: none"> ● Bowker ● Dat Bike ● Dinh Dat Factory ● Hwaseung USV ● Gennon 	<ul style="list-style-type: none"> ● Gio Linh Garment ● Lim Line Apparel ● Longwell ● Saigon Jim Brother’s Corp
Peer Learning Events	<ul style="list-style-type: none"> ● Adidas ● Bank for Investment and Development of Vietnam ● Beacon Fund ● Clickable Impact ● Earth Venture Capital ● GIZ ● H&M ● Hwaseung Enterprise ● Indochina Energy Partners 	<ul style="list-style-type: none"> ● Martech Boiler ● Mitsuho Bank ● Pacific Rim Investment Management ● Standard Chartered Bank ● UOB ● Vietcom Bank ● VF Corporation ● VP Bank

3. Factory beneficiaries

To accelerate the adoption of best practices and promote replicability and scale, MSMA provides technical assistance for innovative projects that generate practical lessons and guidelines for implementers region-wide. In addition to evaluating potential projects based on technical criteria, MSMA reviews all applications to ensure that due diligence criteria are met, with final approval by MSMA’s Chief of Party. The technical support complies with all applicable laws, regulations, rules, and executive orders.