



# ITDP Modern Slavery and Human Trafficking Guidelines

## 1. Purpose

The Institute for Transportation & Development Policy (“ITDP” is committed to conducting business in a legally compliant and ethical manner. ITDP has developed these Modern Slavery and Human Trafficking Guidelines (“Guidelines”) as a guide for its Representatives and Business Partners to engage in ethical, responsible, and legal business practices, specifically with regards to the prevention of all forms of Modern Slavery and Human Trafficking in ITDP’s business.

## 2. Applicability

These Guidelines are applicable globally to all ITDP operations and all Representatives and Business Partners of ITDP. They also apply to joint ventures where ITDP has a controlling interest and to any project where ITDP has responsibility for the functions of the Representative.

## 3. Definitions

3.1. “Business Partners” means companies and individuals who provide products to ITDP or services related to obtaining, retaining or facilitating business, such as contractors, consultants, agents, customs brokers, and professional service providers.

3.2. “Child Labor” means work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

3.3. “Debt Bondage or Bonded Labor” means the status or condition arising from a pledge by a debtor of his personal services or of those of a person under his control as security for a debt, if the



value of those services as reasonably assessed is not applied towards the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

- 3.4. “Descent-based Slavery” means the status or condition arising from a person being born into slavery because an ancestor was captured and enslaved; they remain in slavery by descent
- 3.5. “Due Diligence” means the verifications, precautions, and background research required in order to identify and prevent foreseeable risks.
- 3.6. “Employee” means any person who has a part-time, full-time, intermittent, continuous, or fixed-term employment relationship with ITDP.
- 3.7. “Forced and early Marriage” means when someone is married against their will and cannot leave the marriage. Most child marriages can be considered slavery.
- 3.8. “Forced Labor” means work or service which is extracted from any person under threat or penalty for its non-performance and for which the worker does not offer voluntarily. Employment should be voluntary, and employees should be free to leave or terminate employment with reasonable notice.
- 3.9. “Guidelines” means the written elaborations on ITDP policy that provide further information and interpretation for the implementation of policy.
- 3.10. “Human Trafficking” means the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of



deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, Forced Labor or services, slavery or practices similar to slavery, servitude or the removal of organs.

3.11. “Modern Slavery” is an overarching term encompassing all forms of contemporary slavery including Human Trafficking, slavery, servitude, Descent-based Slavery, Forced Labor, Debt Bondage or Bonded Labor, Forced and early Marriage and Child Labor.

3.12. “Representative” means an Employee of ITDP, along with non-executive directors of the board.

3.13. “Standard Operating Procedures” or “SOPs” are the detailed written descriptions of business processes that aim to ensure consistency and quality in process execution.

## 4. Guidelines

### 4.1. Scope and Guiding Principles

These Guidelines should be read in conjunction with and in addition to the requirements set forth in the ITDP Employee Handbook, which outlines the ethical standards and acceptable behavior that are applicable to all ITDP operations. Breaching these Guidelines is considered a serious offense and carries with it disciplinary action, including immediate termination. Further, if criminal activity is suspected, ITDP will report to the relevant authorities as applicable.

ITDP is committed to the principle that all humans have the right to be free from violence, abuse, and exploitation of any kind. Further, ITDP



embraces and respects the cultural and social diversity of the countries in which we work and places great importance on operating with honesty and integrity. As such, ITDP does not tolerate, condone or accept human rights abuses within its business operations or supply chain.

ITDP, its Representatives, and Business Partners shall not use any form of Modern Slavery. ITDP requires its Representatives and Business Partners to comply with all other applicable laws and regulations in the countries where business is conducted. All references to “applicable laws and regulations” in these Guidelines includes all local, national and international laws, codes, rules, directives, regulations and treaties applicable in the countries where business is conducted. Representatives and Business Partners shall not engage with individuals or entities known or suspected to be associated with the use of Modern Slavery.

#### **4.3. Identifying and Reporting**

All Representatives must report any prior conduct related to an investigation, charge, conviction or other criminal, corrupt, unethical, or unlawful conduct, whether the Representative has ever been investigated for, charged with, convicted or otherwise implicated in criminal, corrupt, unethical, or unlawful conduct, or whether the Representative has ever been issued with a sanction or committed a violation of any Modern Slavery law or regulation.

All Representatives must report any evidence, allegations or suspicions of any conduct relating to Modern Slavery. Representatives should be aware of the indications of Modern Slavery set forth below.

Vulnerability to Modern Slavery is affected by factors related to the presence or absence of protection and respect for rights, physical safety and security, access to the necessities of life such as food, water and health care, and patterns of migration, displacement and conflict.<sup>1</sup> These factors can impede the ability to identify confidently victims of Modern Slavery.

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<sup>1</sup> Global Slavery Index, <https://www.globalsslaveryindex.org/findings/>

Slavery is often hidden and can be difficult to identify, but there are signs which, if appearing together and taken in broader context, might mean that someone is in slavery.<sup>2</sup>

- The individual appears to be in the control of someone else and reluctant to interact with others
- The individual does not have personal identification on them
- The individual appears to have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work
- The individual is not able to move around freely
- The individual is reluctant to talk to strangers or the authorities
- The individual appears frightened, withdrawn, or show signs of physical or psychological abuse
- The individual is dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

Representatives must not try to intervene on their own as it might make the situation of that person worse.

#### 4.4. Recruitment

ITDP has robust recruitment practices (including due diligence requirements) that minimize the risk of engaging Representatives who have been implicated in Modern Slavery or who may pose a risk to those vulnerable to Modern Slavery. All Employees are required to sign a written acknowledgment confirming that they have been made aware of, read, understood and will abide by and act in accordance with the ITDP Employee Handbook.

#### 4.5. Business Partner Engagement

All Business Partners are required to comply with these Guidelines. Business Partners are also strongly encouraged to adopt and enforce policies and procedures that prohibit the use of Modern Slavery. ITDP

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<sup>2</sup> Anti-Slavery International, FAQs, <https://www.antislavery.org/slavery-today/frequently-asked-questions/>

reserves the right to audit Business Partner compliance with these Guidelines.

#### **4.6. Risk Evaluation**

Representatives must assess, review and manage risks annually, or as otherwise necessary, and ensure knowledge of and adherence to relevant client requirements. In this context, project risks relating to Modern Slavery must be assessed, reviewed annually, or as otherwise necessary. Where Representatives identify Modern Slavery risks in a project, ITDP must implement monitoring and control systems to ensure that Modern Slavery is not used in connection with the project or the Business Partners involved.

It is important to understand that trafficking is not one single act but is the result of a number of interrelated acts. Factors which present a high risk of Modern Slavery include:

- The breakdown of Rule of Law;
- Conflict;
- Widespread poverty and displaced population;
- Marginalized communities; and
- The presence of children and young adults who lack family support and protection, e.g. separated children and children in institutional care.

The Global Slavery Index is one resource that ranks 167 countries based on the proportion of the population that is estimated to be in modern slavery and the US Department of State's annual Trafficking in Persons Report ranks countries according to government efforts to combat human trafficking.

#### **4.7. Incident Management**

The Incident management process is outlined in ITDP's Whistleblower Policy and includes the need to immediately report any suspected or alleged instances of Modern Slavery, Human Trafficking or Employee Handbook non-compliance to the Chief Operating Officer ("COO") or the



Human Resources Manager (“HRM”). A Representative may also report to the Representative’s Manager.

All reports are to be made as soon as reasonably practicable and the matter will be dealt with pursuant to the ITDP’s Whistleblower Policy and associated SOPs.

ITDP will take all such reports seriously and will follow applicable ITDP policies, procedures and SOPs as well as Project-specific operational procedures. All parties will be treated fairly and malicious or deliberately false allegations will be subject to disciplinary action, including termination. Based on the allegation, where appropriate, the reports may be forwarded to relevant local law enforcement authorities, as available. In addition, where there are suspicions or allegations of improper conduct of any kind in relation to a project funded by the UK Government, a report can be made to the Counter Fraud and Whistleblowing Unit (CFWU) at [reportingconcerns@fcdo.gov.uk](mailto:reportingconcerns@fcdo.gov.uk) or on +44 (0)1355 843747.

As a further alternative, if Representatives are based in the US, they can report incidents or behaviors through the National Human Trafficking Hotline on 1 (888) 373-7888, or fill out an online form.

#### **4.8. Awareness Training**

Employees of ITDP are required to undergo annual training on this policy. Employees and Representatives working on projects assessed to be at high risk for Modern Slavery undergo further annual training designed specifically for the project in question.

#### **4.9. Periodic review**

These Guidelines will be reviewed every two years, or more frequently as required.

### **5. Compliance**

It is the responsibility of each Representative and Business Partner of ITDP to fully comply with these Guidelines. Failure to comply with these

Guidelines may be result in disciplinary action, including contract termination, contract non-renewal or other adverse actions.

A copy of these Guidelines shall be distributed to all Representatives of ITDP and to all volunteers or other persons who provide substantial services to ITDP.