

**Policy name:** Anti-Slavery and Anti-Trafficking Policy  
**Responsible unit:** Global Award Management  
**Responsible person:** Senior Contracts and Grant Manager  
**Effective date:** 31 July 2019  
**Last updated:** 24 February 2020

#### Applies to:

- All offices
- All offices other than Ipas NC
- Ipas NC only

## Purpose

Ipas strives to conduct itself according to the highest standards of lawful and ethical conduct and is opposed to all forms of slavery and human trafficking. Ipas is committed to mitigating the risk of slavery and human trafficking in connection with our business operations and that of our representatives.

## Definitions

Forced labor is work that is performed involuntarily and under the threat of punishment. It refers to situations in which a person is coerced to work through violence or intimidation (including a threat of being reported to the authorities), tricked into debt, and/or has their identity papers confiscated.

Human trafficking is the recruitment, transportation, housing, transfer, or receipt of a person through threats, coercion, abduction, fraud, deception, abuse of power, or the giving/receiving of payments or benefits for an improper purpose including forced labor, sexual exploitation and/or slavery, or organ removal.

Ipas representatives are non-employees and other entities who are acting or could reasonably be understood by others to be acting as agents of Ipas. Ipas representatives include Ipas's independent contractors or consultants, suppliers, subawardees, partners, agents, interns, volunteers, and Board members.

Slavery is forced labor conducted without proper compensation through ownership or control by another, with restrictions on the slave's freedom of movement.

## Responsibilities

All Ipas employees and representatives are responsible for contributing to an environment that prevents slavery, human trafficking, and forced labor in our business operations, and for reporting suspected instances of these in compliance with the Ethics Hotline Policy.

Violations of this policy will result in disciplinary action, up to and including termination of employment or supplier contract.

## Policy Statement

Ipas has a zero-tolerance policy for slavery, human trafficking, and forced labor in our business operations and that of Ipas representatives.

#### **A. Awareness and Prevention**

Each Ipas office is responsible for training staff and representatives to recognize and report the signs of slavery, trafficking, and forced labor, in accordance with this policy and Ipas-sponsored training courses.

#### **B. Suppliers and Contractors**

Ipas will not knowingly use forced labor in any of the services we provide, nor will we knowingly accept products or services from suppliers that employ or utilize forced labor. In turn, Ipas expects our representatives to comply with this policy to ensure slavery and trafficking is not present in any of our supply chains or business practices.

#### **C. Reporting**

Suspicious and instances of attempted or actual breaches of Ipas's zero-tolerance for slavery, trafficking, and forced labor must be reported to Ipas in accordance with the Ethics Hotline Policy and Hotline Reporting and Investigations Procedure.

## References

- Code of Business Ethics and Conduct and Ethics Hotline Policy. These outline Ipas's standards of conduct and misconduct allegation reporting requirements to support compliance with legal, ethical, and other requirements that govern Ipas programs and business operations.
- Hotline Reporting and Investigations Procedure. This procedure describes how to report concerns of misconduct in accordance with the Ethics Hotline policy and how Ipas manages investigations.
- Investigations Policy. This policy describes how Ipas investigates reported allegations of serious misconduct, and clarifies requirements and prohibitions associated with internal investigations.
- Safeguarding Policy. This policy describes Ipas's commitment and responsibilities for protecting people, particularly children, at-risk adults, and beneficiaries from harm that may be caused due to their contact with Ipas.