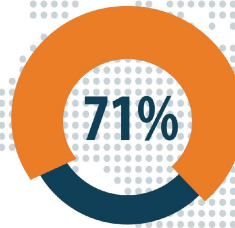


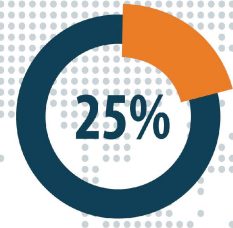
40.3 million

Estimated victims of trafficking in persons or modern slavery worldwide, according to July 2018 Global Slavery Index report.

Nigeria is routinely listed as one of the countries with the largest number of trafficking victims overseas (particularly in Europe), with victims identified in 34 countries in four regions in 2018.



of the 40.3 million victims of trafficking in persons or modern slavery worldwide are women and girls.



of the 40.3 million victims of trafficking in persons or modern slavery worldwide are children.

Purpose:

FHI 360's policy on Combating Trafficking in Persons (TIPs) aligns with international, U.S., U.K., and Nigeria government standards that aim to prevent TIPs, especially among vulnerable populations.

Highlight of prohibited conduct

- Engaging in Trafficking in Persons
- Purchasing commercial sex acts, at any time, due to the following risks; it is not always possible to know:
 - who is consenting to sell sex and who is being forced or coerced into selling sex;
 - the person's age; and
 - if the people from whom sex is being purchased are also FHI 360 program participants. Paying for sex from someone who is under the age of 18 years and/or is forced or coerced are forms of human trafficking according to international and many national laws, as well as a violation of FHI 360 safeguarding policies
- Using forced labor in the performance of a U.S. and Nigerian government contract or award
- Destroying, concealing, confiscating or otherwise denying an employee access to identity or immigration documents like passports or drivers' licenses
- Using misleading or fraudulent recruitment practice, such as failing to disclose in a format or language accessible to the employee or materially misrepresenting key terms and conditions of employment, such as wages and benefits, work location, living conditions, housing or associated costs (if provided or arranged by FHI 360 or by a vendor, contractor, subcontractor, or subrecipient), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work
- Working with recruiters that do not comply with local labor laws of the country in which recruiting takes place
- Charging employee's recruitment fees
- Failing to provide or pay return transportation costs at the end of employment for certain employees who are not nationals of the country in which the work takes place (subject to certain exclusions and conditions)
- Providing or arranging housing that does not meet the host country housing and safety standards
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document in writing in a language the employee understands containing a detailed description of the terms and conditions of employment, at least five days before an employee relocates to perform work.

Supplier Compliance

- **FHI 360 requires ALL contractors, consultants, vendors, subcontractors, and subrecipients ("Suppliers"), and their employees, consultants, interns, volunteers, and agents to:**
 - Refrain from engaging in prohibited trafficking or trafficking-related activity, or other conduct that violates FHI 360's Policy.
 - Take steps to prevent trafficking or trafficking-related activity by Supplier Personnel.
 - Report suspected or known prohibited trafficking-related activity; and Cooperate fully with all investigations of trafficking violations and provide truthful information to investigators.
- **The obligation to report:** All FHI 360 Personnel, Partners, Suppliers and Supplier Personnel are required to adhere to FHI 360's Combating Trafficking in Persons Policy, including not engaging in prohibited conduct and the obligation to report observed, suspected, or known allegations of trafficking-related activity.

○ How to report suspected/known trafficking-related activity

All FHI 360 Personnel, Partners, Suppliers and Supplier Personnel who observe, suspect, or receive allegations of trafficking-related activity, or any other conduct prohibited by this policy, are required to report the conduct immediately (within 24 hours), either orally or in writing, by contacting one of the following:

- Their immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department;
- FHI 360's local Human Resources (HR) representative or regional or departmental HR Partner;
- FHI 360's Director of HR Partnering Useetha Rhodes URhodes@fhi360.org or Chief Human Resources Officer Pam Myers PMyers@fhi360.org;
FHI 360's Office of Compliance and Internal Audit (OCIA) via email at Compliance@fhi360.org;
OCIA's Ethics and Compliance Hotline (1-800-461-9330 in the US, and +1-720-514-4400 outside the US); or
OCIA's reporting website either with your name or anonymously (<http://www.fhi360.org/anonreportregistry>).

All FHI 360 and Supplier personnel who are supervisors or hold a position at director level or above are required to report suspected or known trafficking-related activity or other violation of FHI 360 policy directly to FHI 360's OCIA or Headquarters Human Resources within 24 hours of receiving the information.

○ Available resources and supplemental measures that can be referred to include but not limited to the following:

- NAPTIP
- Ministry of Labour, Employment and Productivity
- Federal Ministry of Women Affairs and Social Development
- State Ministry of Women Affairs and Social Development
- Office of the Special Adviser on Children
- Local Government Child and Social Development Department
- Law enforcement agencies like Police, Civil Defense Corp etc.

○ For additional support, contact NAPTIP or the Global Human Trafficking hotline:

- NAPTIP Hotlines: 07030000203, 080CALLNAPTIP (08002255627847).
Email info@naptip.gov.ng.
- (Ensure that program participants are aware of this global resource: The Global Human Trafficking Hotline at +1-844-888-3733 or help@befree.org) <https://globalmodernslavery.org>.

References

- FHI 360's Combating Trafficking in Person's Policy: <https://www.fhi360.org/sites/default/files/media/documents/pol-01029.pdf>
- <https://pathfindersji.org/nigeria-human-trafficking-factsheet/>
- <https://www.mckissock.com/blog/real-estate/human-trafficking-signs/>