



**IFDC Human Trafficking, Modern
Slavery, Forced Labor, and Child
Labor Policy**

No: 1.04

**Original Date: August 16, 2021
Modified: July 21, 2026**

**Responsible: Human Resources
and Compliance**

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Modification History

Date	Version #	Comments on additions, if any
August 16, 2021	Initial Version	
July 21, 2026	Version 1	

1 Introduction

The International Fertilizer Development Center (IFDC) is committed to conducting business in accordance with the highest ethical standards and prohibits all forms of human trafficking, child labor, and forced labor in line with IFDC's Code of Business Ethics and Conduct. All IFDC-supported activities must prohibit child labor, hazardous work under age 18, forced labor, trafficking, and unsafe worker conditions.

Where applicable, IFDC contracts and agreements shall include appropriate provisions requiring compliance with policy and relevant requirements, including appropriate flow-down obligations for subcontractors.

IFDC may exclude organizations with unresolved, repeated, or severe labor rights violations and may require corrective action plans before engagement. Participation of minors must comply with applicable law, donor requirements, safeguarding standards, and project objectives.

IFDC projects shall apply appropriate risk-based monitoring measures within their areas of responsibilities and oversight, which may include field visits, interviews, observations, documentation reviews, and photographic evidence, where appropriate and permitted by local law. Where persons under 18 participate in training or other project activities, their participation must be permitted under applicable law and project requirements and subject to appropriate safeguarding measures.

2 Purpose, Scope, and Awareness Campaigns

This policy applies to all IFDC employees, consultants, volunteers and board members. Partners, contractors, subcontractors, suppliers, and other third parties are required to comply with the applicable requirements of this policy as reflected in their contractual or award provisions and other applicable obligations.

Modern slavery is a crime and a violation of fundamental human rights. IFDC is committed to the elimination of all forms of human trafficking, forced labor, and child labor and requires its partners and contractors to comply with applicable contractual, legal, and donor

requirements relating to these practices. The organization has a zero-tolerance approach to such activities.

Human Resources is responsible for applying this policy in relation to IFDC personnel, recruitment, and employment practices. Compliance provides guidance, supports risk assessment and due diligence, and provides oversight of compliance with this policy. Procurement is responsible for incorporating applicable requirements into procurement and supplier processes. Program management and country offices are responsible for implementing appropriate controls and monitoring within the projects and operations under their oversight. All personnel are responsible for promptly reporting concerns through the available reporting channels.

Where an IFDC award is subject to additional donor-specific requirements relating to human trafficking, modern slavery, forced labor, or child labor, such requirements will be implemented through the applicable award, procedure, or compliance mechanism, as appropriate.

3 Definitions

Child Labor: Work that deprives children of their childhood, potential, dignity, health, safety, or education, including work prohibited under national law or International Labor Organization (ILO) Conventions 138 and 182.

Forced Labor: All work or service exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily, in accordance with ILO Convention 29.

Human Trafficking: Recruitment, transportation, transfer, harboring, or reception of persons, including the exchange or transfer of control over those 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.

Hazardous Work: Any activity at the workplace that poses a significant risk to the health, safety, or well-being of workers. The younger and more inexperienced the worker, the higher incidence of a potential hazard.

Young Worker: A person under the age of 18 who is employed and whose employment must be strictly controlled and protected in terms of health, safety, and working conditions.

Modern Slavery: Situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, abuse of power, or other forms of control, including forced labor, debt bondage, human trafficking, servitude, and slavery-like practices.

4 Policy Statements

4.1 Prohibition to Engage in Human Trafficking and Recruit Child Labor

IFDC will not employ persons below the applicable legal minimum working age or otherwise engage child labor as defined under this policy. IFDC employees will not engage or support human trafficking or forced labor.

4.2 Reporting in Cases of Suspicion

IFDC employees who become aware of or reasonably suspect child labor, forced labor, human trafficking, or modern slavery linked to IFDC operations must promptly report the concern through an appropriate IFDC reporting channel. Concerns may be reported to a supervisor, Human Resources, or Compliance or through IFDC's EthicsPoint confidential reporting system (<http://ifdc.ethicspoint.com/>). IFDC prohibits retaliation against any person who, in good faith, reports a concern or participates in an investigation under this policy.

4.3 Responsibility of Application for Partners, Contractors, and Subcontractors

Partners, contractors, and subcontractors are expected to comply with applicable requirements of this policy, as reflected in relevant contractual or award provisions. IFDC will include appropriate compliance provisions in agreement where applicable.

Appropriate SEAH requirements will be incorporated into contracts, grants, awards, and subawards, and related project requirements where applicable, based on donor, legal, contractual, and safeguarding requirements.

4.4 Application for Suppliers

IFDC will not knowingly engage suppliers that use child labor, forced labor, human trafficking, or other forms of modern slavery and will take reasonable due diligence measures to identify and mitigate such risks.

4.5 Students

Students approved to obtain work experience with IFDC in accordance with international standards and local applicable laws are not considered child or forced labor.

5 Violations

IFDC has a zero-tolerance policy regarding any of its employees, associates, agents, contractors/vendors, subcontractors, or suppliers (or their employees) engaging in or supporting the use of slavery, forced, involuntary or coerced labor, child labor, human trafficking, or sex trafficking. Failure to comply with this policy may result in disciplinary action up to and including termination of employment, in accordance with applicable IFDC policies and local law. If any agent, contractor/vendor, subcontractor, or supplier is found

in violation of this policy, IFDC may take appropriate remedial measures based on the nature and severity of the violation, applicable contractual provisions, donor requirements, and local law up to and including termination of the relationship with IFDC.

Reported concerns will be reviewed and addressed in accordance with applicable IFDC procedures. Any investigation will be conducted objectively, impartially and with appropriate confidentiality. Persons who are the subject of allegations will be given a reasonable opportunity to respond before findings are finalized or disciplinary decisions are made, subject to applicable law and necessary safeguards measures.

6 Partner Screening

As part of the applicable due diligence process, IFDC will conduct risk-based screening of prospective partners, suppliers, and grantees, including relevant legal and compliance history where appropriate. Organizations with substantiated, unresolved, repeated, or severe violations may be excluded following a risk-based compliance assessment and recommendation, with the ultimate decision made in accordance with the applicable procurement, award, and approval procedure.

7 Implementation Strategy for Partners

IFDC will apply risk-based oversight of implementing partners to support compliance with applicable country- and donor-specific labor requirements. The nature and extent of oversight will reflect the level of risk, IFDC's contractual rights and responsibilities, and the circumstances of the project.

Strengthen Internal Controls and Detection Capability: Monitoring activities may include photographs where appropriate, lawful, and consented, consistent with safeguarding and data protection requirements. Where suspected or confirmed child labor is identified at a project site, IFDC will take appropriate and timely protective and remedial action, which may include suspension of the affected activity or a stop-work instruction, subject to applicable contractual, donor, and legal requirements.

Monitor and Adapt: Relevant monitoring outcomes should be documented and used, where appropriate, to inform improvements to controls, procedures, and implementation practices.

In practice, an implementing partner must ensure on-the-ground enforcement is taking place, following local labor laws. IFDC will monitor partner compliance within the scope of its contractual responsibilities and oversight arrangements and will take appropriate action where concerns are identified.

8 Safeguard Clauses

IFDC and its implementing partners shall comply with applicable donor requirements, contractual obligations, and national laws relating to human trafficking, modern slavery, forced labor, and child labor.

Chapter 4, Article 32, of the EU Charter of Fundamental Rights (Prohibition of Child Labor and Protection of Young People at Work): Young people admitted to work must have working conditions appropriate to their age and be protected against economic exploitation and any work likely to harm their safety, health, or physical, mental, moral, or social development or to interfere with their education.

ILO Convention 138 (Minimum Age): Lawful apprenticeships, vocational training, and youth employment may be permitted under applicable national law and international standards, subject to appropriate safeguards. IFDC will comply with applicable minimum-age requirements and will not permit persons under 18 to undertake hazardous work. Any permitted engagement of young workers must comply with applicable law, safeguarding requirements, and the protections set out in this policy.

ILO Convention 182 (Worst Forms of Child Labor): Slavery and practices like slavery are prohibited, including trafficking, debt bondage, and forced recruitment for armed conflict, sexual exploitation, including prostitution and pornography, use of children in illicit activities, such as drug production and trafficking, etc.

United Nations Palermo Protocol: This protocol prevents and combats trafficking in persons, with particular attention to women and children, protects and assists victims of trafficking, ensuring their human rights are fully respected, and promotes international cooperation among states to achieve these objectives. In practicality, it provides the first legally binding international definition of human trafficking, covering recruitment, transportation, transfer, harboring, or receipt of persons through coercion, fraud, abuse of power, or payments to control another person, for the purpose of exploitation which includes sexual exploitation, forced labor, slavery, servitude, and organ removal. For children under 18, the means of coercion is irrelevant; it is any act of recruitment or transport for exploitation.

International Fund for Agricultural Development (IFAD) Social, Environmental and Climate Assessment Procedures (SECAP): SECAP encompasses nine standards that guide IFAD-supported projects, including:

1. Biodiversity conservation
2. Resource efficiency and pollution prevention
3. Cultural heritage
4. Indigenous Peoples' rights
5. Labor and working conditions
6. Community health and safety
7. Physical and economic resettlement
8. Financial intermediaries and direct investments
9. Climate change adaptation and mitigation

National Labor Laws: These laws must be followed to ensure underage workers are not present on IFDC projects. The clauses should be selectively referenced in all contractual agreements based on donor and local/national labor laws.