**IMA World Health**

*COMMUNICATION ON ENGAGEMENT (COE) WITH UN GLOBAL COMPACT*

*MARCH 2020*

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**HUMAN RIGHTS**

*Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.*

IMA World Health (IMA) fundamentally believes in and values internationally proclaimed human rights and strives to protect these rights for our staff and the people we serve worldwide in the following ways:

* Our human resources policies prohibit any form of discrimination in the workplace because of race, religion, age, sex, disability, sexual orientation, gender identity, etc.
* We strive to maintain safe and healthy working conditions. All required federal employment policies and resources are displayed in accessible common areas for staff to reference in the U.S. as are any government-required employment materials in countries where we have offices. We additionally provide information on other health and wellness resources for staff in these common areas.
* We make every effort in our physical workspaces and policies in the U.S. and abroad to ensure persons with disabilities can work with us or access our services during project implementations without hindrance. In the U.S., we comply with the Americans with Disabilities Act (ADA) and the ADA Amendments Act (ADAAA). In countries with national laws pertaining to persons with disabilities, we follow them. In countries without such laws, we operate as if under the ADA and ADAAA.
* We inform staff of and monitor the health, safety, and security risks of places they must travel for work through International SOS. In emergency situations, we set up operational task forces to further coordinate and implement organizational security protocols. For example, during the COVID-19 global pandemic, we established a task force with representatives from all departments to prepare for and communicate precautionary measures, which included transitioning all U.S-based offices to telework operations for a period of time.
* Our expectation that human rights are safeguarded in all our operations extends to all of our partners, contractors, and suppliers, including hired armed guards.

*Principle 2: Businesses should make sure that they are not complicit in human rights abuses.*

Because IMA fundamentally believes in and values internationally proclaimed human rights, we strive to not be complicit in abuses in the following ways:

* We have provided trainings to our staff on anti-human trafficking, anti-slavery, and anti-discriminatory measures in the past and are devising a mandatory slate of these trainings for all current and incoming staff.
* We have several mechanisms for anonymously reporting failures or concerns in this regard to management that require documented follow-up to close each case. For example, staff can call a hotline number to make a report to the third-party company Convercent, which then follows through on the report with IMA management. We also use context-appropriate community complaint response mechanisms in every project, which allow project participants to anonymously make reports.
* When seeking new partnerships, whether they be with local non-governmental organizations or multinational corporations, we thoroughly vet potential partners with our institutional due diligence process.
* We employ a rigorous monitoring and evaluation process in all our projects with the intent of learning and adapting our projects in real time to improve their effectiveness as well as to identify and avoid any potential abuses of the rights of project participants.
* We serve as the founding organization and secretariat of We Will Speak Out U.S., a coalition of faith-based organizations working together to empower faith communities to speak out against Sexual and Gender Based Violence.
* We have been working with the U.K. Department for International Development (DFID) to assess and codify our compliance with the prevention of modern slavery in our work. To date, we have completed their Modern Slavery Assessment Tool and are working to implement the recommendations from it.

**LABOR**

*Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.*

IMA values its employees and respects their rights to assemble and engage in collective bargaining in the following ways:

* We follow all national laws in the U.S. and in other countries where we operate regarding the freedom of our employees to form and join a trade union of their choice without fear of intimidation or reprisal.
* We have declared our commitment to the International Labour Organization’s Labour Standards.

*Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labor.*

IMA condemns all forms of forced and compulsory labor and ensures we are not complicit in the following ways:

* We intentionally design and monitor projects so forced and compulsory labor is not used to achieve and maintain gains.
* In our procurement manual, we enforce the setting of reasonable lead times and other best practices in procurement to ensure we are not using, being complicit in, or benefiting from forced labor.
* We are developing a statement on how we prevent modern slavery and will be training staff on the forms of modern slavery and how to report it as part of their onboarding process.
* Through our vetting process, we check that potential vendors have not used forced or compulsory labor, among other things.

*Principle 5: Businesses should uphold the effective abolition of child labor.*

Because IMA condemns all forms of forced and compulsory labor, we especially seek to uphold the effective abolition of child labor in the following ways:

* We intentionally design and monitor projects so child labor is not used to achieve and maintain gains. Additionally, many of our projects reduce labor around the home, such as the promotion of efficient cookstoves and micro-gardens, which has a positive impact on the use of domestic child labor.
* We are aware of countries, regions, sectors, and economic activities where there is a greater likelihood of child labor to occur and respond accordingly with policies and procedures, including but not limited to acknowledgment of elevated risk in proposals and incorporating the U.S. Department of Labor guidance on countries and industries of high risk for child and forced labor into procurement decisions.
* In our country human resources and procurement manuals, we adhere to minimum age provisions of national labor laws, and, where national law is insufficient, we adhere to international standards. Ensuring adherence to these policies is a part of our partner, subcontractor, and supplier vetting process.

*Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.*

IMA believes diversity is a strength and that hiring a diverse group of qualified individuals contributes to the overall success of our organization. We are committed to eliminating all forms of discrimination in respect of employment and occupation in the following ways:

* It is a violation of our policy to discriminate in the provision of employment opportunities, benefits or privileges, to create discriminatory work conditions, or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, because of race, religion, age, sex, disability, sexual orientation, gender identity, etc.
* We recruit, hire, train, promote, and conduct all employment actions without regard to these protected characteristics including any verbal, physical, written, or visual conduct that is demeaning, intimidating, insulting, or otherwise makes a person feel uncomfortable. All derogatory treatment of persons because of these aforementioned characteristics or any other legally protected category is prohibited. This policy applies to all employees, contractors, agents, or others who have contact with employees.
* We also are continually in a process of assessing our staff and leadership diversity and making improvements on an ongoing basis.
* We strive to ensure gender balance on interview panels.
* While we do have some projects specifically designed to improve gender equity in the communities where we work, we are taking steps to mainstream gender equity into all new projects, including having internal experts review project designs specifically with a gender lens.
* We do not use someone’s race, religion, age, sex, disability, sexual orientation, gender identity, etc., to preclude them from participating in or benefiting from one of our projects.

**ENVIRONMENT**

*Principle 7: Businesses should support a precautionary approach to environmental challenges.*

IMA accepts the scientific evidence of climate change and environmental degradation, and with environmental issues where scientific understanding is not complete, we take a precautionary approach and take cost-effective steps in our work to mitigate environmental damages. For example:

* We assess staff travel needs and do our best to avoid unnecessary trips that would increase our carbon footprint.
* In our offices, we take efforts to avoid using disposable plates, cups, utensils, and water bottles and turn off lights in areas not in use.

*Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.*

As a faith-based organization, IMA believes people are stewards of the Earth. We take seriously our responsibility to protect the environment, and we approach our environmental stewardship in the following ways:

* In 2019, we established an Environmental Stewardship Committee tasked with the development of an Environmental Stewardship Policy that includes an environmental conservation code of conduct for staff. The committee will monitor compliance with the policy and continue to make recommendations to strengthen it. In preparation for the development of this policy, the committee is undertaking a light-touch carbon-audit of our three HQ offices and conducting focus group discussions with staff in various offices around the world to garner feedback, ideas, and buy-in for the new policy.
* The Environmental Stewardship Committee will also identify and monitor environmental risks as part of the organization’s enterprise risk management initiative and will research relevant environmental laws in our countries of operation.
* Our Environmental Stewardship Policy will be integrated into country strategies, proposals, and partnership agreements moving forward.

*Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.*

IMA prioritizes the development and use of technologies for development to improve the reach, efficiency, and environmental stewardship of our projects in the following ways:

* We included a provision explicitly prioritizing the use of best practice environmental technologies in project design in our new Environmental Stewardship Policy.
* We currently use mobile data collection in many of our projects to reduce paper usage and intend to increase our mobile data collection capabilities in the coming years.
* We use different software applications that we have developed on our own or that already exist, such as WhatsApp, to disseminate information more widely without needing to travel or use paper.

**ANTI-CORRUPTION**

*Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.*

IMA strongly condemns all forms of corruption and takes intentional steps to ensure we are not complicit in it in the following ways:

* We have an anti-bribery and corruption policy that prohibits the offering, giving, solicitation or acceptance of any bribe or corrupt inducement, whether in cash or in any other form:
  + To or from any person or organization wherever located, whether a public official or public entity, or a private person or company.
  + By any individual employee, partner, agent, consultant, contractor or other person or entity acting on the behalf of IMA.
  + In order to gain any commercial, contractual, or regulatory advantage for the firm in which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.
* We will investigate thoroughly any actual or suspected breach of this policy. Employees found to be in breach of this policy may be subject to disciplinary action, up to and including immediate termination. Agents, consultants, contractors and any other people or entities associated with our organization may also be subject to penalty that may also ultimately result in our refusal to work with them.
* We have an in-depth vetting process we put each potential partner or supplier through before we work with them.
* We conduct thorough background checks on all potential new hires.
* We have several anonymous mechanisms for reporting cases of corruption to management that require documented follow-up to close a case. For example, staff can anonymously call a hotline number to make a report to the external company Convercent, which then follows through on the report with IMA management. We also use context appropriate community complaint response mechanisms in every project, which allow project participants to anonymously make reports.
* We have provided anti-corruption trainings to staff in the past and are in the process of formalizing them in a slate of mandatory staff trainings.
* We have established an Enterprise Risk Management unit to assess and manage our organizational risks (through developing and maintaining risk registers, trainings, etc.) as well as conduct fraud investigations to resolve identified issues.

**CHANGES FOR IMA WORLD HEALTH**

In 2019, IMA joined forces with long-time partner Lutheran World Relief (LWR) to found Corus International to spearhead new collaborations and innovations across the global development, aid, public health, and private sectors that achieve transformational change and build self-reliance. Corus International now heads a family of faith-based organizations committed to ending poverty and building healthy communities in the world’s most challenging places. Corus draws on the over 75 years of experience of its non-profit and for-profit subsidiary organizations –LWR, IMA, Charlie Goldsmith Associates (CGA), Ground Up Investing, IMA Innovations, and LWR Farmers Market. Together, we take a systems approach to grow rural economies, eliminate extreme poverty, ensure access to quality healthcare, and respond to urgent humanitarian needs in fragile settings.

At present, IMA and CGA are signatories of the UN Global Compact. As they are now subsidiaries of Corus International, we will be determining the appropriate steps to take to reflect these changes with the Compact by the next reporting cycle.