

COMMUNICATION ON ENGAGEMENT (COE)



Period covered by this Communication on Engagement:

From: 2019-07-16 To: 2021-11-03

Part I. Statement of Continued Support by the Chief Executive or Equivalent

November 3, 2021

To our stakeholders:

I am pleased to confirm that International Medical Corps (UK) reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labour, Environment, and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact. We welcome feedback on its contents.

In this Communication of Engagement, we describe the actions that our organisation has taken to support the UN Global Compact and its Principles as suggested for an organisation like ours. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,



*Ognjen Radosavljevic
Managing Director*

Part II. Description of Actions

International Medical Corps (UK) (IMC (UK)) is a UK registered, independent non-governmental organisation. International Medical Corps (IMC) is a US-registered independent affiliate organisation of International Medical Corps (UK), with which IMC (UK) shares the same name and charitable objectives and mission.

International Medical Corps is a global humanitarian organisation dedicated to saving lives and relieving suffering. Established in 1984 by volunteer doctors and nurses, our mission is to improve the quality of life through health interventions and related activities that strengthen underserved communities worldwide. With the flexibility to respond rapidly to emergencies, we offer medical services and training to people at the highest risk, always working to strengthen local healthcare systems and promote self-reliance.¹

Specific actions International Medical Corps (UK) and its implementing affiliate International Medical Corps have taken in support of the Global Compact include:

Advocacy & Collective Action

International Medical Corps (UK) has directly and indirectly engaged with various donors and networks since its signing of the commitment to support the UN Global Compact in 2019. IMC (UK) is an active member of collective civil society bodies that contribute to humanitarian response and international development, including BOND, a UK network with membership of over 400 organisations. Both directly and through BOND, IMC (UK) works to influence policy makers within the UK government and the broader international community to continue support for humanitarian causes and promote the rights of people affected by natural and man-made disasters.

International Medical Corps (UK) is a member of START Network, through which it aims to transform humanitarian action through innovation, early action, and localisation. Both BOND and START Network have strong advocacy initiatives related to climate change. IMC (UK) has continued its membership with VOICE (Voluntary Organisations in Cooperation in Emergencies), an NGO consortium based in Brussels, to ensure that concerns and views of those affected by humanitarian emergencies are considered in decisions related to aid provided by the European Union.

At the global level, International Medical Corps is a member of a number of policy-related initiatives through collective entities such as InterAction, a coalition of NGOs within the United States, and ICVA, a global NGO network. It is an active participant in structures within the Inter-Agency Standing Committee (IASC), a body comprising representation from UN agencies, the International Red Cross/Red Crescent, and non-governmental organisations, including the IASC Operational Policy and Advocacy Group (OPAG).

¹ IMC (UK) and IMC work together to deliver assistance programmes in an accountable and effective manner in pursuit of their commonly-held charitable objectives. IMC (UK) engages IMC to implement its programmes in the field, with IMC (UK) oversight, according to the terms and conditions of the agreement that results from proposals to donors and the terms of the parties' administrative service agreement. Together with IMC Croatia, IMC provides administrative and operational support to IMC (UK) and to the programmes on the ground, including but not limited to financial management, banking and cash management, procurement management/international procurements, and logistics.

International Medical Corps also engages with the private sector, including foundations and corporations, to support our emergency preparedness and response efforts. For example, corporations such as Apple, AbbVie, Bloomberg, FedEx, JPMorgan Chase, Gilead, Medtronic, Riot Games, and more, provide financial and technical resources to respond to crises that have an adverse impact on the health and well-being of vulnerable people. Through this philanthropic and in-kind support, International Medical Corps is able to provide health and related services, thereby enabling the right to access health care for some of those most vulnerable and marginalized.

Application of Principles

International Medical Corps is committed to the Ten Principles of the Global Compact.

Human Rights (Principles 1&2)

International Medical Corps (UK) and International Medical Corps are committed to the principles of human rights. We support and respect the protection of internationally proclaimed human rights, and make sure that we are not complicit in human rights abuses, either through our direct programming or actions of our partners. We also work to promote the right to access to healthcare.

Code of Conduct & Ethics. International Medical Corps' Code of Ethics & Conduct sets forth the standards of conduct for all staff members, consultants, and volunteers. It contains guidance in key areas, including conflicts of interest, anti-bribery, gifts and entertainment, compliance with donor requirements, trade restrictions and anti-terrorism, and accountability to affected populations and programme quality. All International Medical Corps employees, volunteers, and consultants are responsible for knowing and abiding by the standards contained in the Code of Ethics & Conduct and reporting any suspected violations. Individuals who violate the Code of Ethics & Conduct may be subject to disciplinary action, up to and including termination. International Medical Corps expects all of its staff to act in a transparent, honest, and ethical manner and promote such actions throughout the organisation.

Safeguarding Initiatives. In order to further strengthen our efforts to safeguard our staff and the people and communities with whom we work, International Medical Corps launched its umbrella Safeguarding Policy in 2020 along with a series of operational measures. These measures included enhancing, updating, and consolidating our policies already in place that supported child safeguarding and protection from sexual exploitation and abuse. The dissemination of the Safeguarding Policy was accompanied by operational guidance on how to implement the new policy, including dedicated support and training from safeguarding experts. Country-level offices have dedicated action plans to ensure that activities are in place that recognize the rights of staff and communities and encourage a culture that protects vulnerable populations from harm.

Reporting/Speak-Up Mechanisms (Whistleblower). Anyone (including members of the general public) who suspects that International Medical Corps, or any of its employees, directors, officers, consultants, suppliers, or other business partners, is not respecting or upholding any part of the International Medical Corps Code of Conduct & Ethics are directed to report the matter. International Medical Corps actively encourages its employees to speak up, and has a policy that prohibits any retaliation against any employee making a good-faith report of suspected unlawful or unethical conduct.

Staff Training. To ensure implementation of our principles and orientation of IMC and IMC (UK) personnel, IMC has implemented mandatory training for all its staff annually, including scheduled refresher courses. An updated version of the mandatory staff training was launched in March 2020, with

a new version of the refresher training rolling out in 2021.

Trainings provide links to the applicable policies and procedures and provide orientation about their content with contextualized examples. This includes:

- Anti-Bribery Policy
- Anti-Terrorism and Prohibited Party Screening Policy
- Code of Conduct & Ethics
- Conflict of Interest Policy
- Fraud Policy
- Protection from Harassment, Bullying, and Sexual Misconduct in the Workplace Policy
- Safeguarding Policy
- Whistleblower Policy

Labour (Principles 3, 4, 5 & 6)

In its business practices, IMC (UK) and IMC uphold the principles related to labour. We strive to protect the rights to freedom of association and collective bargaining, and work toward the elimination of forced labour, child labour, and employment discrimination.

International Medical Corps has in place a Global Combatting Trafficking in Persons Compliance Plan, as well as a Modern Slavery Statement. These documents outline International Medical Corps' opposition to human trafficking and modern slavery in any form and our commitment to mitigating the risk of human trafficking and modern slavery in all aspects of our organisation. Additionally, the Child Safeguarding section our Safeguarding Policy includes interventions aimed at the prevention of abuse, exploitation, neglect, child labour, and other forms of violence against children; as well as protection of children who are in these situations and implementation of appropriate measures and resources to support the needs of children who have survived them.

In order to ensure vendors' commitment to respecting human rights of their own employees, vendors are required to sign a Vendor Code of Conduct to enter into contractual arrangements with International Medical Corps. Provisions in the Vendor Code of Conduct that vendors must adhere to include prevention of forced labour, modern slavery and child labour, elimination of discrimination, and ensuring employees' rights in relation to freedom of association and effective recognition of the right to collective bargaining. The Vendor Code of Conduct informs vendors that International Medical Corps will not tolerate violations and will apply measures if violations are discovered.

Environment (Principles 7, 8 & 9)

International Medical Corps (UK) and International Medical Corps support the principles related to the environment in our approach to environmental challenges. In our work, we undertake initiatives to promote greater environmental responsibility and encourage the usage of environmentally friendly technologies.

International Medical Corps actively participated in development of the Universal Logistics Standards and has contributed to the language addressing, among other things, the cross-cutting theme of environmental protection. The creation of these standards was led by the Inspire Consortium with the support of the European Commission Civil Protection and Humanitarian Aid Operations (ECHO). International Medical Corps also contributed to the ECHO "Draft Minimum Environmental Principles and

Requirements.” This input was in support of ECHO to develop minimum requirements for partners in priority areas where readily available solutions can provide the greatest environmental benefits.

International Medical Corps has signed onto InterAction’s NGO Climate Compact. The purpose of the NGO Climate Compact is to initiate large-scale change across our sector, recognizing that the environment is central to achieving our mission to serve the world’s poorest and most vulnerable people. The Climate Compact will contribute to meeting higher-level global goals, such as the Sustainable Development Goals (SDGs) and UN Paris Agreement on Climate Change.

International Medical Corps is also participating in the “Reseau Environnement Humanitaire” (Environmental Humanitarian Network), engaging with other humanitarian organisations in reviewing, developing, and sharing tools and methodologies to reduce the carbon footprint of our operations.

Anti-Corruption (Principle 10)

International Medical Corps (UK) and International Medical Corps fully commit to the principle of anti-corruption, by working against corruption in all its forms, including extortion and bribery.

International Medical Corps works to the highest standards of integrity. We have a zero-tolerance approach to all forms of fraud, bribery, and corruption, with a well-established Code of Conduct & Ethics and extensive anti-fraud and anti-corruption internal controls integrated into our key business processes such as procurement, logistics, human resources, finances, and programme implementation.

Offer Verification. As part of International Medical Corps’ due diligence process, we collect information about and vet vendors who are allowed to bid on procurements. This is the first line of defense against fraudulent or unqualified vendors. Offer verifications are a second line of defense that protect International Medical Corps against the risk of entering into business with fraudulent and/or unqualified suppliers. The offer verification process allows International Medical Corps to detect illegitimate vendors, uncover true vendor ownership, confirm bid validity, and detect forged bids.

Ethical Procurement Principles. International Medical Corps’ Procurement Manual sets out its procurement principles and expected purchasing conduct and ethics for procurement staff. These principles address who can participate in contract selection, the acceptance of gratuities, adherence to local laws, and proper stewardship of programme funds, vehicles, equipment, supplies, assets, and other property, among other topics.

Part III. Measurement of Outcomes

Enabling Access to Health Care

With support from AIG, FedEx, and Pfizer, International Medical Corps is strengthening COVID-19 vaccination efforts internationally, reaching underserved and vulnerable populations. Key activities include: 1) establishing responsive coordination mechanisms to improve countries’ COVID-19 response capacity and readiness; 2) training on vaccine management, infection prevention and control (IPC), and post-campaign monitoring; 3) vaccination awareness and education campaigns through mass messaging and outreach; and 4) procurement and distribution of supplies and equipment, including personal protective equipment (PPE), cold chain storage, IPC supplies, and health facility infrastructure to safeguard healthcare workers and support large-scale immunization efforts. This collaboration supports human rights, the right to health care, and equity in vaccine distribution during the COVID-19 pandemic.

Ensuring Human Rights Practices of Vendors

International Medical Corps (UK) and International Medical Corps screen staff, vendors, and partners for known violations through specialized software. Periodic rescreening is in place to ensure screened parties hold their compliance status. International Medical Corps does not enter into contractual arrangements with parties when reported in those lists.

As an example, International Medical Corps banned dealing with an overseas manufacturer of gloves and purchasing of their products in 2020 after we were made aware that the vendor was allegedly using prisoners for forced labour. The ban was in place until the company compensated victims of forced labour, as confirmed by US Customs and Border Patrol.

Mitigating Environmental Impact

The environmental impact of humanitarian operations is in large part attributed to logistics and supply chain activities due to carbon and other emissions connected to the transport of goods and personnel, the manufacturing of relief items, and the waste generated by items' packaging. Logistics and supply chain, including procurement, transport, storage, and delivery/distribution of humanitarian supplies, present multiple opportunities for making humanitarian action more environmentally friendly. International Medical Corps supply chain personnel are sensitized on the long-term impact of the humanitarian interventions and encouraged to implement precautionary measures to minimize the duration of the impact.

International Medical Corps has integrated environmental considerations and implements concrete actions in its daily logistics and supply chain operations (including the issuance of the "Reducing Carbon Footprint and Other Negative Impact on Environment – Logistics & Supply Chain" guideline). International Medical Corps acknowledges that reducing environmental impact of our operations requires sustained efforts throughout multiple years and has therefore developed a 4-year logistics & supply chain strategy, including an action plan to effectively implement changes and measure their impact. This will enable a scheduled implementation of tools and measurement methods to minimize the impact of logistics and supply chain operations to the environment.

Some examples of attempts to minimize negative impact on environment are:

- Optimize and plan international and in-country shipments to minimize use of airfreight
- Purchase or rent fit-for-purpose, fuel efficient vehicles and power generators and regularly optimize fleet size
- Track carbon footprint for international shipments
- Select appropriate transport means and consolidate cargos whenever possible
- Institute separate storage and careful monitoring of medical waste and expired pharmaceuticals, as well as safe and timely disposal in line with local and international standards
- Procure and deploy green-powered generators and cold-chain equipment (which has increased in the recent period, taking into account the environmental impact of carbon-energy powered alternatives).

Implementing Anti-Corruption Practices

International Medical Corps (UK) and International Medical Corps have embedded anti-corruption elements into staff and vendor codes of conduct, as well as all forms of contracting templates

implemented by International Medical Corps for procurement of supplies, works, and services, with the aim to increase awareness that International Medical Corps has zero tolerance for violations and commits to sanction any discovered violations. Contracts with vendors include detailed description of prohibited behavior and reference to sanctions leading up to termination of the contract.

International Medical Corps monitors and rates vendor performance and eliminates vendors showing any signs of unethical behavior from future bidding opportunities temporarily or permanently, subject to the extent of the violation. Staff are encouraged to report any violation or suspected violation of the Code of Conduct & Ethics and any misuse of financial or material resources internally or by external parties dealing with International Medical Corps.

As an example, International Medical Corps has banned a number of vendors operating in its country programmes, due to collusion with the aim to make extra profits at the expense of humanitarian actors.