

ACTION FOR HUMANITY

Anti-Trafficking Policy

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Responsible			
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Introduction

Action for Humanity is a UK based registered charity working to provide humanitarian and development assistance to the most vulnerable population affected by disasters, conflicts and extreme poverty. Its vision is to be the leading charity combining humanitarian and development approaches in assisting affected people and marginalised communities in fragile contexts and crisis areas worldwide.

Action for Humanity is opposed to the acts of modern-day slavery and human trafficking in any form. We are committed to ensuring that our employees, suppliers, consultant, and subcontractors take the appropriate steps to mitigate the risk of modern-day slavery and human trafficking from occurring in any aspect of our business and our supply chain. Action for Humanity has a zero-tolerance policy regarding any employees and contractor personnel, consultant and their engaging in any severe form of trafficking in persons. Action for Humanity stands behind and whole-heartedly supports this zero-tolerance policy.

1. Purpose

The policy describes Action for Humanity's guiding principles with respect to combating trafficking in persons. Action for Humanity is opposed to all forms of trafficking in persons and is committed to mitigating the risk of trafficking in persons in connection with its programmes in the areas of operations. Action for Humanity is committed to full compliance with the UK Government's Modern Slavery Act.

2. The Policy and Plan:

This Policy and Plan sets forth Action for Humanity's policy against trafficking in persons and in trafficking in persons compliance plan. This policy and plan are consistent with the Action for Humanity Standards of Conduct and core values of practicing respect for all people and conducting ourselves in an ethical, lawful manner. Action for Humanity is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labour and all other trafficking-related activities. Action for Humanity is committed to fully complying with all applicable labour and employment laws, rules and regulations and working to mitigate the risk of human trafficking in our business and supply chains. Action for Humanity employees, subcontractors, subcontractor employees and Consultant shall fully comply with all applicable labour and employment laws, rules and regulations, shall not:

1. Engage in severe forms of trafficking in persons.
2. Procure commercial sex acts.
3. Use forced labour.
4. Destroy, conceal, confiscate or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
5. Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work or use recruiters that do not comply with local labour laws of the country in which the recruiting takes place.
6. Charge employee's recruitment fees.
7. Provide or arrange housing that fails to meet the host country housing and safety standards or if required by law or contract, fail to provide an employment contract, recruitment agreement, or

Anti-Trafficking Policy

other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five (5) days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

3. Disciplinary Action:

Action for Humanity will take appropriate action against employees, subcontractors, subcontractor employees, and consultant that violate this Policy and Plan, which action may include, but is not limited to, the following, as applicable:

Removal of employees from the contract, or requiring the subcontractor to remove a subcontractor employee or employees from the contract:

- Reduction in employee benefits.
- Termination of employment.
- Declining to exercise available option under the contract.
- Termination of the contract for default or cause, in accordance with the termination clause of the contract, or requiring the subcontractor to terminate a contract.
- Termination of the business relationship with the subcontractor.

4. Compliance Plan:

The key components of Action for Humanity Combatting Trafficking in Persons Compliance Plan are summarized as follows:

1. An awareness program to inform staff about the trafficking-related prohibitions described in the TIP Prevention Policy, the activities prohibited and the action that will be taken against the staff member for violations.
2. All Action for Humanity staff has the responsibility to report, without fear of retaliation, activity inconsistent with the TIP Prevention Policy.

Reporting mechanisms:

- Supervisor
- Country Director
- Safeguarding Focal Point.
- Human Resources Department.
- Compliance Department.
- HQ.
- Global Human Trafficking Staff may also file a report with the Global Human Trafficking its e-mail address at help@befree.org.

Staff should consult their immediate supervisor, the Human Resources Department, Compliance Department, if they are uncertain whether a specific action would be in violation of the TIP Prevention Policy.

3. Recruitment and wage provisions that only permits the use of recruitment companies with trained employees, prohibits charging of recruitment fees to the staff member, and ensures that wages meet applicable host-country legal requirements, or explains any variance.

Anti-Trafficking Policy

- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place.
- Charging employee's recruitment fees.

In addition, Action for Humanity only permits the use of recruitment companies that provide proper training to employees, do not charge recruitment fees to employees, and that have established procedures to ensure that wages meet applicable host country legal requirements.

4. Housing provisions, if Action for Humanity or any subrecipient intends to provide or arrange housing under this award. The housing must meet host-country housing and safety standards.
5. Procedures for Action for Humanity to prevent any agents or subrecipients at any tier or money value from engaging in trafficking activities. Action for Humanity must also have procedures to monitor, detect, and terminate any agents or subrecipients (or employees) that have engaged in such activities.

5. Defined Terms:

- "Consultant" – Any individual authorized to act on behalf of the organization.
- "Commercial Sex Act" – Any sex act on account of which anything of value is given to or received by any person.
- "Employee" – Any individual, including a director, officer, an employee, or an independent contractor, authorized to act on behalf of the organization.
- "Human Trafficking" – The recruitment, harbouring, transportation, transfer, or receipt of persons by means of abduction, fraud, coercion, deception, or abuse of power of a position of vulnerability for the purpose of exploitation.
- "Subcontractor" – Any supplier, distributor, vendor, or firm that furnishes supplies or services to or for a prime contractor or another subcontractor.
- "Severe Form of Trafficking in Persons" – Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or the recruitment, harbouring, transportation, provision, or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

6. Review

The comprehensive review of the policy will take place as per schedule; however, the Trustees may ask to review the policy anytime during the year to ensure policy is consistent and effective.