



# Anti–Human Trafficking Policy

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## Policy Statement

CHAI is opposed to all forms of trafficking in persons, modern day slavery, and child labor exploitation. Human trafficking and exploitation are wholly contrary to CHAI’s mission. We are committed to ethical, lawful, and responsible behavior in all our activities. The well-being, dignity, and safety of those our programs serve, our staff, and our partners is critical to CHAI. Additionally, in all aspects of our organization, CHAI will comply with applicable laws and regulations prohibiting exploitation and trafficking in persons.

## Definitions

*Trafficking in persons:* Trafficking is an umbrella term including both forced labor and sex trafficking, including the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force. This includes coercion, abduction, fraud, deception, the abuse of power or of a position, and the giving or receiving of payments or benefits to achieve the consent of a person or having control over another person for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation or the prostitution of others, or other forms of sexual exploitation, forced labor or services, slavery, or practices similar to slavery, servitude, or the removal of organs. The consent of a person trafficked is irrelevant.

*Commercial sex act:* any sex act on account of which anything of value is given to or received by any person.

*Forced labor:* knowingly providing or obtaining the labor or services of a person:

1. By threats of serious harm to, or physical restraint against, that person or another person;
2. By means of any scheme, plan, or pattern intended to cause the person to believe that if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
3. By means of the abuse or threatened abuse of law or the legal process.

## Scope of Policy

This policy applies to CHAI employees, volunteers, secondees and interns collectively referred to as (“CHAI Staff”). This policy also applies to CHAI subrecipients and contractors.

## Prohibited Activities

- A) Engage in the trafficking in persons, defined as using force, fraud, or coercion for the purpose of obtaining labor.
- B) Procure commercial sex acts.
- C) Use forced labor in the performance of our work.

- D) Undertake acts that directly support or advance trafficking in persons, including the following:
- i) Destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
  - ii) Failing to provide return transportation or pay for return transportation costs to an employee from a country outside the United States to the country from which the employee was recruited upon the end of employment if requested by the employee, unless:
    - a) exempted from the requirement to provide or pay for such return transportation by the donor under the award.
    - b) the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action.
  - iii) Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment.
  - iv) Charging employees recruitment fees.
  - v) Use of 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.
  - vi) When applicable, providing or arranging housing that fails to meet relevant safety standards for housing within a country.

### **Responsibilities**

All individuals and organizations referenced in the above *To Whom the Policy Applies* section must comply with this policy and must not take part in any of the prohibited activities listed above. They also have a responsibility to report a potential violation through one of CHAI's reporting mechanisms. CHAI's Safeguarding program has an obligation to investigate allegations in accordance with CHAI's policies, processes, and applicable laws.

### **Consequences of Violation**

Discipline for violation of the Anti-Human Trafficking Policy may take various forms, up to and including immediate termination of employment or other relationship with CHAI and/or termination of any applicable contract. All disciplinary actions will be carried out in accordance with applicable CHAI policies and applicable laws.