



PAD ORGANIZATIONAL ANTI-HUMAN TRAFFICKING POLICY

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Table of Contents

A. Policy Statement	3
B. Mandatory Reporting Requirements.....	4
C. Violations of this Policy	4
D. Counseling and Rehabilitation Programs.....	4

A. Policy Statement

Positive Action for Development (PAD) is committed to maintaining safe, productive working conditions for its employees. The Organization strictly prohibits, and will not tolerate, trafficking in persons and any other form of slavery, including but not limited to, sex trafficking and/or labor trafficking. Trafficking is the recruitment, harboring, transportation, provision, obtaining, patronizing or soliciting of a person for the purposes of a commercial sex act and/or labor or services through the use of force, fraud or coercion for the purposes of subjection to involuntary servitude, debt or slavery. Positive Action for Development (PAD) employees, contractors, subcontractors, suppliers, vendors and others through whom PAD conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons;
- Viewing explicit material using Organization funds or resources or viewing explicit material involving trafficked persons;
- Procuring commercial sex acts;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and 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;
- Charging applicants/candidates recruitment fees;
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;

This policy is effective immediately and supersedes all previous policies. Contractors, subcontractors, suppliers and vendors will be advised as to the policy's application to them as set forth in the Master Service Agreement and in PAD's Code of Conduct. The supervisor responsible for managing each Branch of PAD is responsible for implementing and enforcing this Policy in accordance of the provisions set forth within. PAD will provide appropriate training to supervisors for implementing the organization policy and procedures.

B. Mandatory Reporting Requirements

Employees who become aware of potential violations of the Human Trafficking Policy or any related laws or regulations have an immediate obligation to report these concerns to their supervisor or Human Resources representative so they may be reviewed and addressed in an ethical and responsible manner and further reported, if necessary. Timeliness of reporting any suspected violation is critical. Employees may confidentially report possible violations to PAD's Compliance and Reporting platforms. PAD will not take any adverse action against employees for making an honest report of suspected human trafficking-related activities.

C. Violations of this Policy

If PAD suspects that an employee, contractor, subcontractor, supplier, vendor or any other agent of the organizations has violated this policy, PAD will immediately investigate and at its sole discretion, take appropriate actions against those who violate this policy. Such actions include, but are not limited to, termination of the agreement or contract, removal from the contract, reduction in benefits, and disciplinary action up to and including termination of employment. The Company may also refer the matter to law enforcement. Finally, any job applicants who violate this policy will not be hired to work at PAD. Failure to report actual or potential illegal behavior or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment. PAD requires employees who perform work under any PADs in contract should confirm that they are aware of and understand each of the above items prior to the commencement of their assignment under the contract.

D. Counseling and Rehabilitation Programs

For those affected by human trafficking, PAD offers eligible employees the opportunity to participate a benefit program that provides assistance to employees who suffer from personal or emotional problems. All information an employee provides to PAD regarding his or her desire to seek treatment will be kept confidential and handled in accordance with applicable law. PAD will reasonably accommodate employees who are seeking treatment in accordance with applicable law. *Should any information in this policy conflict with any federal or state law, the applicable agreement or provision of law will take precedence.*