

## Objective

CAN is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. CAN will not tolerate or condone human trafficking or slavery in any part of our organization. This policy is consistent with CAN's Code of Ethics and Business Conduct and our core values to protect and advance human dignity and human rights in our business practices.

CAN employees, contractors, subcontractors, vendors, suppliers, partners and others through whom CAN conducts business must avoid wrongful acts that constitutes trafficking in persons or slavery.

## Scope

This policy applies to all personnel employed by or engaged to provide services to CAN, including but not limited to CAN's employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this policy, "employees").

Every CAN employee is responsible for reading, understanding, and complying with this policy. If you have questions or concerns relating to this policy, consult Human Resources.

## Policy

The United States Government and CAN have a zero-tolerance policy prohibiting human trafficking-related activities:

1. Forced, bonded (including debt bondage), or indentured labor
  - a. Debt bondage means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.
  - b. Forced labor means knowingly providing or obtaining the labor or services of a person –

- i. By threats of serious harm to, or physical restraint against, that person or another person;
  - ii. 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
  - iii. By means of the abuse or threatened abuse of law or the legal process.
- 2. Commercial sex - any sex act on account of which anything of value is given to or received by any person
- 3. Involuntary prison labor or servitude
  - a. Includes a condition of servitude induced by means of –
    - i. Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or
    - ii. The abuse or threatened abuse of the legal process
- 4. Slavery
- 5. Trafficking of persons
  - a. Sex trafficking (the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act) 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
  - b. The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services.

- 1. Coercion means
  - a. Threats of serious harm to or physical restraint against any person;
  - b. Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or
  - c. The abuse or threatened abuse of the legal process.

This policy also includes:

1. Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of the issuing authority
2. 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 misrepresentation 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 provided by CAN), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work
3. Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place
4. Charging employees recruitment fees
5. If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation up on the end of employment
6. If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards
7. If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing

### **Disciplinary Action**

Any violation of this policy could result in disciplinary action up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

### **Reporting**

If you learn of any conduct that you believe may violate this policy, report it immediately by any means to Human Resources. Any reporting will be done without fear of retaliation. CAN prohibits retaliation against anyone who files a complaint or reports a suspected violation of this policy. In addition, you may contact the U.S. State Department's Global Human Trafficking Hotline directly at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).