

COMPANY ANTI-HUMAN TRAFFICKING POLICY



Companies should develop and implement a policy to ensure they are not complicit in any practice that may constitute human trafficking or modern-day slavery. This policy should apply to contractors, subcontractors, suppliers, vendors and others. In addition to mitigating risk, a robust policy is an important preventative measure because it addresses the demand for labor exploitation and commercial sex which feeds this crime. Contact TAT for guidance on implementing an anti-human trafficking policy in your company.

MODEL POLICY*

[Company] is committed to doing business in a manner that supports our high standards of business conduct and values. Therefore, [company] strictly prohibits and will not tolerate trafficking in persons, including sex and labor trafficking. This encompasses the following activities:

- Using forced labor in the performance of any work.
- Using or allowing the use of any of the [company's] facilities, resources or equipment to support human trafficking.
- Using any [company] resources, including credit cards and expense accounts, to purchase sex.
- Creating, downloading, viewing, storing, copying or transmitting content that is sexually explicit or sexually oriented during work hours, while traveling on business, while engaged in any work-related activities, or using [company] resources.
- Viewing and searching websites where adult entertainment is offered for sale or viewing and searching online advertisements for commercial sex during work hours, while working on company business, while engaged in any work-related activities, or using [company] resources.
- Destroying, concealing, confiscating or otherwise denying access by an individual employee or contractor to the individual's identity or immigration documents.
- Using misleading or fraudulent practices during the recruitment of candidates or offering employment or contract positions.
- Entering into on behalf of the [company] or otherwise any business relationships or other arrangements with an organization that the employee has reason to believe participates in any way in human trafficking or the exploitation of humans.

REPORTING REQUIREMENTS

All employees have a responsibility to ensure that this policy is followed. Employees must be vigilant and immediately report, as appropriate, all situations that come to their attention on the [company's] premises or in its operations where human trafficking is suspected or appears to be intended. Concerns and potential violations should be reported to the [company point of contact].

The [company] strictly prohibits retaliation against any employee for making a good faith report of any potential or suspected violation of this policy or cooperating in any investigation of such violation.

VIOLATIONS OF THIS POLICY

Employees who violate this policy may be subject to disciplinary action up to and including termination.

*U.S. Chamber of Commerce and TAT, *Business Engagement Toolkit for the Transportation and Energy Industries*, <https://www.uschamber.com/employment-law/anti-human-trafficking/business-best-practices-to-stop-human-trafficking> (January 2024).