



COMBATING TRAFFICKING IN PERSONS POLICY

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SCOPE

The mission of the AQLITY and all its subsidiaries is to help people whose lives and livelihoods are shattered by conflict and disaster to survive, recover and gain control of their future. As part of the fulfilment of this mission, AQLITY commits to the ethical treatment of its workers, beneficiaries, partners, suppliers, and vendors around the world. This commitment is reflected in AQLITY's institutional code of conduct.

AQLITY's core values are entirely opposed to the worldwide phenomenon of trafficking in persons. AQLITY considers trafficking in persons as a fundamental and grave violation of human rights and is opposed to it in all forms. This policy and associated compliance plan affirm AQLITY's (1) commitment to safeguard its operations and ensure that its staff are not victims of or engaged in the crime of trafficking and (2) compliance with statutes and regulations aimed at combatting trafficking in persons, including the Republic of Ireland's The Criminal Law (Human Trafficking) Act 2008 and 2nd National Action Plan to Prevent and Combat Human Trafficking in Ireland (2016).

DEFINITION

The United Nations Convention on Transnational Organized Crime (the Palermo Protocol of 2000) and the Trafficking Victims Protection Act (TVPA) of 2000 define trafficking in persons to be "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation."

Key elements or types of activities that constitute trafficking are defined as follows:

Coercion:

- Threats of serious harm to or physical restraint against any person;
- 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
- The abuse or threatened abuse of the legal process.

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

Debt bondage: 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.



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

- By threats of serious harm to, or physical restraint against, that person or another person;
- 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
- By means of the abuse or threatened abuse of law or the legal process.

Involuntary servitude: a condition of servitude induced by means of—

- 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
- The abuse or threatened abuse of the legal process.

Severe forms 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.

Sex trafficking: the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

POLICY

Pursuant to this Policy, AQLITY prohibits the following:

- Engaging in trafficking;
- Procuring commercial sex acts while performing work for or in the employment of AQLITY;
- Using forced labor in the performance of any work for AQLITY;
- Denying access to an employee to his/her identity documents;
- Misleading employees about the nature and terms of employment during the recruiting process;
- Using recruiters that do not comply with local labor laws;
- Charging employees recruitment fees;
- Failing to provide return transportation for expatriates brought to the country for the purpose of working for AQLITY;
- Providing or arrange housing that fails to meet host country housing/safety standards; and
- Where the law requires, failing to provide a written contract of employment.



Violations of the above commitments by AQLITY's staff will be subject to disciplinary action, up to and including termination of employment.

AQLITY further commits to the following in accordance with this policy:

1. Recruitment and Wage Plan.

- AQLITY will only contract with recruiting companies with trained staff;
- No recruitment fees shall be charged to employees by AQLITY or any recruiting agency it engages;
- Wages will meet host-country legal requirements;
- Potential employees may not be intentionally misled about the nature and terms of employment during the recruiting process;
- Upon the completion of an assignment, AQLITY will pay for the return transportation of its staff from a foreign country;
- When AQLITY is working in a country where the law requires that the citizens of that country be provided a written employment contract AQLITY will provide employees with this agreement; and
- AQLITY will review identity documents for employment purposes, but will not take possession of the original documentation or deny employees access to their own identity documents.

2. Housing Plan.

For all workers for whom AQLITY provides or arranges housing, housing will be, at a minimum, in compliance with host-country standards.

REPORTING PROCESS

AQLITY staff are required to report any activity that is inconsistent with the commitments described in this Policy. In accordance with AQLITY's Global Reporting Guidelines, a worker shall report such activity by:

- Informing his/her immediate supervisor as soon as possible.
- Informing any of the following persons if the worker does not wish to make the report known to the supervisor:
 - Supervisor's supervisor
 - Designated HR representative
 - Most senior person in the location
 - The Integrity and Accountability Unit (integrity@aqility.org)

If the complaint involves a member of the senior management of the organization or a member of the Board of Directors, a report should be made to the CEO or directly the Directors of AQLITY CLG.



In cases where direct reporting is not possible, or the reporter feels it is necessary to be anonymous, a reporter may use safeguarding@aqility.org or integrity@aqility.org .

AQLITY requires all staff to report direct knowledge and reasonable suspicion or concerns of conduct that is inconsistent with the AQLITY Code of Conduct or breaches of AQLITY Organizational Policies, including the Combating Trafficking in Persons Policy. In accordance with AQLITY's Bullying, Harassment and Discrimination and Grievance Policy, retaliation against a worker who has made a good faith complaint or report of an AQLITY policy violation or other improper conduct will not be tolerated. Consistent with AQLITY Global Reporting Guidelines, a worker who feels he or she is being retaliated against or who believes he or she has observed retaliation should report the matter immediately.