Anti-Human Trafficking Policy

Effective: October 2026

Purpose

HIAS is an organization dedicated to providing humanitarian aid to those in need, advocating for basic human rights, and protecting the most vulnerable. Human Trafficking is a fundamental and grave violation of human rights and HIAS opposes it in all forms. HIAS is committed to ensuring that all of our programs and operations are free from any form of Human Trafficking or conduct that contributes to Human Trafficking.

While HIAS does not tolerate any form of abuse or exploitation, this Policy specifically covers Human Trafficking and conduct that contributes to Human Trafficking caused by:

- The conduct of Associated Personnel.
- The design and implementation of HIAS' programs and activities, including operations, recruitment of staff, procurement, fundraising, and communications.

This Policy does not cover Human Trafficking concerns in the wider community not perpetrated by HIAS staff, Associated Personnel, or partners.

See Appendix A for a glossary of terms and definitions.

Applicability

This Policy applies globally to all HIAS staff and other personnel, HIAS Partners and certain HIAS Visitors (collectively referred to as "Associated Personnel").

This Policy applies at all times, including outside working hours.

Following this Policy is mandatory. Non-compliance will lead to disciplinary action, up to and including termination. Associated Personnel found to have engaged in Human Trafficking may also be subject to criminal action.

For HIAS Partners, violation of this Policy or failure to take appropriate corrective action may result in suspension or immediate termination of the partnership agreement and may also result in the party being deemed ineligible for future partnership agreements with HIAS.

HIAS follows the law. If any part of this policy conflicts with the law, the law must be followed. However, if HIAS' standards for Safeguarding are stricter than the law, then HIAS' standards must be followed.

Policy Statement

HIAS strictly prohibits and adopts a zero-tolerance policy for Associate Personnel or the organization engaging in, complicity with, or benefiting from any form of Human Trafficking or conduct that contributes to Human Trafficking.

HIAS follows the United States Government's anti-trafficking laws, regulations, and policies, as well as applicable international laws.[1] The organization and Associated Personnel have mandates that must be followed to create an environment where all people are treated with dignity and respect, and trafficking in all its forms is prevented.

Associated Personnel:

- Must not participate, directly or indirectly, in any stage of Human Trafficking (capture, transfer, illegal retention, or exploitation)
- Are prohibited from exchanging money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior. This includes paying for commercial sex acts including services from sex workers, even if such transactions would be legal and/or consensual in the jurisdiction where they would occur.
- May not destroy, conceal, confiscate, or otherwise deny any person access to their identity documents
- Should contribute to creating and maintaining a culture and secure environment that prevents Human Trafficking and promotes the implementation of this Policy.
- Must report any concern, suspicion or witness to an incident of Human Trafficking by Associated Personnel immediately via HIAS' reporting mechanisms.
    - Failure to report knowledge or a reasonable suspicion or concern of a Human Trafficking violation will be subject to disciplinary action, up to and including termination.
    - Associated Personnel must cooperate in any investigation when requested.

Managers and leaders must:

- Promote a culture that prevents abuse and supports this Policy.
- Make sure their teams understand and follow the Policy.
- Take all reports seriously and either personally report concerns via HIAS' reporting mechanisms or ensure staff under their supervision immediately complete reporting responsibilities.
- Protect whistleblowers from retaliation.
- Ensure staff performance supports a safe and accountable workplace.
- Ensure all members of their team attend proper training related to this Policy.
- Build systems that help to implement and enforce this Policy.

HIAS will:

- Use transparent recruitment practices. This includes fully and accurately disclosing all key terms and conditions of employment, including wages and benefits, living conditions, any housing or associated arrangements (where provided or organized by HIAS), and any costs that may be charged to the employee. Disclosures will be easy to access and in a language relevant to the potential employee.
- Use recruiters that comply with local labor laws of the country in which recruitment takes place.
- Not charge any applicant, candidate or employee recruitment fees.
- Comply with local labor laws everywhere we operate. This includes providing a written contract of employment or proof of employment where local employment regulations require such documentation.

[1] Such laws include the UK Modern Slavery Act (2015), the U.S. Trafficking Victims Protection Act (2000), and International Labor Standards on Child Labor and Forced Labor.

- Pay wages that meet host-country legal requirements.
- In situations where HIAS provides housing to employees, HIAS will guarantee the housing will meet or exceed host-country housing and safety standards.
- Pay contractually-agreed return transportation costs for international ("ex-pat") employees who have finished employment outside that employee's nation of residence.
- Not use forced labor in the performance of any work for HIAS.
- Use strong Safeguarding practices when hiring and managing staff, including conducting relevant and legally obtainable criminal background, reference and Misconduct Disclosure checks.
- Train all staff on this Policy and their specific responsibilities at hire and annually thereafter.
- Design and undertake all programs and activities (including data and content gathering) in a way that minimizes the risks of Human Trafficking and modern-day slavery.
- Post clear, visible information about this Policy and how to report concerns in all offices and project sites, in relevant languages.
- Assign a Safeguarding focal point in each country to support staff, raise awareness, and receive reports.
- Inform Program Participants and communities about this Policy and how to report suspected trafficking concerns.
- Provide multiple safe, confidential, and accessible ways for people to give feedback or report concerns, as outlined in the Accountability to Affected Populations Guidance. Reports will be escalated quickly to HIAS' General Counsel and the Global Safeguarding Team.
- Include Safeguarding requirements including the prevention of Human Trafficking, forced labor and modern slavery in contracts and agreements with partners, assess their ability to follow this Policy, and monitor their compliance.
- Follow national laws related to Human Trafficking, forced labor and modern slavey. If HIAS standards are stricter than local laws, HIAS standards will apply.
- Will not buy goods or engage services known to be provided by or produced by trafficked or forced labor
- Shall engage in appropriate due diligence processes to have confidence that vendors, contractors or service providers are not engaging in trafficking or forced labor.

Reporting

HIAS requires all Associated Personnel to immediately report any Safeguarding concerns, including suspected trafficking, to HIAS' General Counsel by telephone (1-888-559-8518 or EthicsPoint numbers listed on website), email (ethics@hias.org) or www.hias.ethicspoint.com. Reports may also be submitted to Safeguarding staff or focal points where they are trained and in place. Reports may be submitted anonymously.

Any staff reporting concerns or complaints will be protected from any form of retaliation or negative employment consequences, per HIAS' Whistleblowing Policy. Anyone who knowingly gives false information will violate this and other HIAS Policies and may face disciplinary action.

HIAS' Global Safeguarding Team and General Counsel will report Safeguarding concerns, including suspected Human Trafficking, to the Executive Group. They will also decide if the funder or donor needs to be informed, based on reporting rules. If the concern involves criminal behavior, it will be reported to relevant authorities, while considering the survivor's safety, security, and preferences.

Investigations

HIAS will carry out independent, confidential, and survivor-centered investigations by trained investigators.

Investigators will recognize the rights and interests of everyone involved, including the person making the report and survivor (if different from the reporter), witnesses, and subject of complaint. Investigations will be carried out according to HIAS' Standard Operating Procedures for Dealing with Safeguarding Concerns. If necessary, HIAS may also refer reports to other agencies for investigation.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with Safeguarding concerns, including Human Trafficking concerns. Information relating to the concern and subsequent case management will be shared only on a need-to-know basis and will be always kept secure. Where a law, rule or regulation, such as the European Union General Data Protection Regulation (GDPR), governs a person's access to information, HIAS will comply with that law, rule, or regulation while also keeping information related to the concern confidential.

Associated Policies

- HIAS Code of Conduct
- HIAS Safeguarding Policy
- HIAS Prevention from Sexual Exploitation and Abuse Policy
- HIAS Safeguarding of Children Policy
- HIAS Whistleblowing Policy
- HIAS Procurement Policy
- HIAS Supplier Code of Conduct

Changes and Updates to this Policy

HIAS reserves the right to make changes and updates to this Policy as required. If modified, the Policy will be communicated to all HIAS Staff and Associated Personnel and posted on HIASnet, indicating the date of the latest revision.

HIAS Personnel Anti-Human Trafficking Certification Form

- I confirm that I've received and read the HIAS Anti-Human Trafficking Policy. I understand what it says and agree to follow all its terms.
- I will report any possible or actual violations of this Policy or related procedures.
- I understand it's my responsibility to ask questions if anything in the Policy is unclear, and I've had the chance to do so.
- I understand that if I violate this Policy, fail to report a violation I know about, or intentionally hide a violation, I may face disciplinary action. This could include losing my job or contract with HIAS, and HIAS may take legal action against me.
- I also understand that violations may lead to criminal or civil penalties under the law, which HIAS may choose to pursue.
- I agree to sign this Policy when I start working with HIAS and again annually.

_____ _____

Print Name Position or Affiliation with HIAS

_____ _____

Signature Date

Document Type: Board Policy
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Date of next review:

APPENDIX A: Glossary of Terms

Associated Personnel refer to all HIAS Staff and Other Personnel, HIAS Partners and certain HIAS Visitors. Associated Personnel are covered by this Policy and are subject to Policy requirements.

Commercial Sex Act is any sex act where anything of value is given to or received by any person in exchange for the act.

Forced Labor is a situation in which persons are coerced to work through the use of violence or intimidation or by more subtle means, such as accumulated debt, retention of identity papers, or threats of denunciation to immigration authorities.

HIAS Partners refers to external parties in association (contractual or non-contractual) with HIAS such as HIAS' partners, affiliates, sub-recipients, suppliers, and vendors, working for or receiving funding from HIAS.

HIAS Staff and Other Personnel is (a) permanent, fixed term, and temporary staff; (b) board members; (c) outside consultants, independent contractors, and sub-contractors; (d) third-party representatives and agents; and (e) volunteers, community workers, interns and public service or fellows who conduct work on behalf of HIAS.

HIAS Visitor refers to visitors or guests at HIAS programs, programmatic sites or offices invited to HIAS locations or acting in an official capacity with HIAS Program Participants that are not otherwise covered by mutual agreements (such as UNHCR representatives) handled by contract or at the global level.

Human Trafficking means recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, fraud, coercion, abduction, deception, the abuse of power or of a position of vulnerability, or using payments or benefits to exert control over a person for the purpose of exploiting them for profit. Exploitation includes involuntary servitude, peonage, debt bondage or slavery, the removal of organs, and sex trafficking.

Misconduct Disclosure Scheme is an interagency agreement to engage in pre-employment checks during the recruitment process that systematically requests and shares information on substantiated allegations or ongoing investigations of sexual exploitation, abuse, and harassment (SEAH).

Program Participant is someone who directly receives goods or services from HIAS' program(s). In some locations or programs a Program Participant may be referred to as a participant, client, beneficiary or beneficiary of services.

Modern Slavery is an umbrella term which includes Human Trafficking, slavery, servitude, forced and compulsory labor, and other forms of exploitation.

Safeguarding refers to the measures put in place by organizations to prevent, identify and respond to harm that may be caused by inappropriate sexual activity, abuse or exploitation, or other exploitative or abusive conduct. It is the organization's responsibility to make sure their staff, operations and programs "do no harm" to anyone that comes in contact with the organization, especially children and vulnerable adults, and to not expose them to the risk of or actual harm and abuse - *Keeping Children Safe (adapted)*.

Survivor Centered Approach: HIAS is committed to responding to all reports of conduct that violate this Policy with

a survivor-centered approach. This means that the safety, dignity, and well-being of the survivor are the primary considerations in all steps that HIAS takes in responding to Safeguarding concerns and in taking precautions to minimize any additional harm to the survivor. HIAS will seek to ensure that survivors are referred to medical, psychosocial, legal, and safety support services, as appropriate and available, and according to the survivor's specific needs and wishes. HIAS will assist survivors with reporting incidents to the proper authorities should they so choose.

Whistleblower is a person who has a reasonable belief that HIAS Associated Personnel violated a law, rule, regulation or HIAS policy. This person can expect to be protected from retaliation when and after making a report, in line with HIAS' Whistleblowing Policy.

Zero Tolerance is the organization's responsibility to adequately respond to any concerns of violations of this Policy. This includes the obligation to report any knowledge, suspicion, or rumor of a Safeguarding violation, including trafficking, the responsibility to investigate any concerns that our brought to our attention, and, in the case of substantiated allegations, to respond with adequate remedial and corrective measures, including through disciplinary action up to and including termination of employment or a third-party agreement.