



**Welcome the stranger.
Protect the refugee.**

HIAS SUPPLIER CODE OF CONDUCT

December 31, 2022

Introduction

In keeping with its vision and values, HIAS is committed to maintaining the highest degree of ethical conduct. Our Supplier Code of Conduct (the “Supplier Code”), as may be amended from time to time, outlines HIAS’ expectations and guidelines with respect to responsible sourcing.

Scope

HIAS’ Supplier Code sets forth the expectations for vendors, suppliers and contractors (collectively referred to as “Suppliers”) with whom it does business. This applies to Suppliers as well as their employees, parents, subsidiaries, affiliate entities, and subcontractors and shall be communicated as such. The Supplier should also encourage all vendors to adhere to these standards. The Supplier is required to read and acknowledge this Supplier Code.

Principles

HIAS’ Supplier Code is aligned with the ten principles of the United Nations Global Compact (“Principles”). This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption. Suppliers are encouraged to support the Global Compact. For more information on the ten principles, you can visit the Global Compact website at www.unglobalcompact.org. The ten principles are as follows.

Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses.

Labor

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labor;
5. the effective abolition of child labor; and
6. the elimination of discrimination in respect of employment and occupation.

Environment



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7. Businesses should support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

Standards

The following standards are derived from the Principles and HIAS' Policies and shall be adhered to by all Suppliers.

Labor

1. **Forced or Compulsory Labor:** HIAS expects its Suppliers to prohibit forced or compulsory labor in all its forms.
2. **Child Labor:** HIAS expects its Suppliers not to employ: (a) children below 14 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.
3. **Discrimination:** HIAS expects its Suppliers to ensure equality of opportunity and treatment in respect of employment and occupation without discrimination based on a person's membership in or affiliation with a protected group, which may include, but is not limited to: race, color, ethnicity, national origin or ancestry, citizenship, caste, socio-economic status, political opinion, tribal affiliation, religion, creed, sex, sexual orientation or age. (HIAS also prohibits unfair treatment or arbitrary distinction based on a protected status or characteristic, including, but not limited to: domestic partnership, familial status, caregiver status, victim of gender-based violence, pregnancy, lactation, childbirth or related medical conditions, gender expression or identity, physical or mental disability, neurodiversity, genetic information (including testing) or any other status protected by federal, state, or local law.) HIAS expects its Suppliers to take all appropriate measures to ensure that neither they nor their parent, subsidiary, affiliate entities or their subcontractors are engaged in any discriminatory employment practices, including those relating to recruitment, promotion, training, remuneration and benefits.
4. **Wages, Working Hours and Other Conditions of Work:** HIAS expects its Suppliers to ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned. Suppliers should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement, and Suppliers should



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inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by Suppliers should be not less favorable than the best conditions prevailing locally (i.e., as contained in: i. collective agreements covering a substantial proportion of employers and workers; ii. arbitration awards; or iii. applicable laws or regulations), for work of the same character performed in the trade or industry concerned in the area where work is carried out.

5. **Health and Safety:** HIAS expects its Suppliers to ensure, so far as is reasonably practicable, that: (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health; (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

Human Rights

6. **Human Rights:** HIAS expects its Suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.
7. **Safeguarding:** HIAS expects its Suppliers to not engage in any conduct that is exploitative or abusive including:
 - Physically, sexually or emotionally abusing others;
 - Sexual harassment, threatening violence, or bullying;
 - Harsh or inhumane treatment, coercion or corporal punishment of any kind or the threat of any such treatment;
 - Engaging in sexual or romantic relationships with program participants or clients that involve abuse of power or position;
 - Causing any harm to children through sexual, emotional or physical abuse, exploitation or neglect;
 - Making unsolicited, personal contact with children via any means, including social media; and
 - Taking photographs of children without the consent of children, parents or guardians, or publicizing these without the written consent of parents or guardians including for personal use.
8. **Anti-Human Trafficking:** HIAS' Suppliers are prohibited from engaging in the following behaviors:
 - Engaging in human trafficking;
 - Any offer to exchange, or actual exchange, of money, employment, goods or services for sex, sexual favors or other forms of humiliating, degrading or exploitative behavior, even when such transactions would be legal and/or consensual in the jurisdiction where they would occur;



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- Denying an employee access to identity documents;
- Using misleading or fraudulent recruitment practices;
- Using recruiters that do not comply with host country labor laws;
- Charging employees recruitment fees;
- Providing or arranging housing that fails to meet host country housing safety standards;
- Where the law requires it, failing to provide a written contract of employment or proof of employment; and
- Failing to pay contractually agreed return transportation costs for certain employees who have finished employment outside that employee's nation of residence.

Environment

9. **Environmental:** HIAS expects its Suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should, wherever possible, support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.
10. **Chemical and Hazardous Materials:** Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.
11. **Wastewater and Solid Waste:** Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.
12. **Air Emissions:** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.
13. **Energy Consumption and Greenhouse Gas Emissions:** Suppliers shall track and document energy consumption and greenhouse gas emissions. Suppliers shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.
14. **Minimize Waste, Maximize Recycling:** Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Anti-Corruption

15. **Corruption:** HIAS expects its Suppliers to adhere to the highest standards of moral and



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ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery.

16. **Conflict of Interest:** HIAS Suppliers are expected to disclose to HIAS any situation that may appear as a conflict of interest, and disclose to HIAS if any HIAS official or professional may have an interest of any kind in the Supplier's business or any kind of economic ties with the Supplier.
17. **Gifts and Hospitality:** HIAS expects its Suppliers not to offer any benefit such as free goods or services, employment or sales opportunity to a HIAS staff member in order to facilitate the Suppliers' business with HIAS.
18. **Abuse of Power:** HIAS prohibits its Suppliers from utilizing an unreasonable use of a position of influence, status, power or authority to require or coerce an individual to perform an action or task that is inappropriate, disrespectful or illegal.

Questions

Any questions related to this Supplier Code can be addressed to the HIAS Contracting Manager at email: procureinquiry@hias.org

Reporting Tools

Suppliers should report possible violations of this Supplier Code through the resources below as soon as reasonably possible after becoming aware of the matter. Retaliation for such reporting is prohibited.

- Online via www.hias.ethicspoint.com; or
- By email at ethics@hias.org.
- By phone at 1-888-559-8518



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SUPPLIER COMMITMENT

On behalf of the Applicant, it is hereby confirmed that:

- the Applicant has read this this Supplier Code;
- the Applicant undertakes to comply with this Supplier Code and agrees that it shall form the basis of any future business with HIAS;
- the Applicant shall be held responsible for ensuring compliance with this Supplier Code by their employees, company representatives, as well as subcontractors and any business partners that the Applicant may use to supply products and/or services when doing business with HIAS.

The signatories hereby acknowledge that (a) they are authorized representative(s) of the Applicant, and (b) they are permitted to make these undertakings on behalf of the Applicant.

Name:	Title:
Organization:	
Signature:	Date:
Email:	Phone:

