



Welcome the stranger.  
Protect the refugee.

## Anti-Human Trafficking Policy

### I. Purpose

HIAS is an organization dedicated to providing humanitarian aid to those in need, advocating for basic human rights, and protecting the most vulnerable. HIAS' values are opposed to the crime and human rights violation of trafficking in persons. Thus, HIAS is committed to prohibiting and preventing human trafficking and associated conduct amongst personnel and partners and to ensuring that these entities and HIAS' beneficiaries are not victims of the crime of trafficking. This policy seeks to be in compliance and alignment with the United States Government's anti-trafficking laws, regulations, and policies, as well as applicable international laws.<sup>1</sup>

### II. Scope

This Policy applies to all HIAS staff and associated personnel globally (collectively referred to as "HIAS Person"). "HIAS Person" is defined as all: (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 legal fellows who conduct work on behalf of HIAS. This Policy also applies to external parties, such as HIAS' partners, sub-recipients, suppliers, and vendors, working for or receiving funding from HIAS ("HIAS Partner"). In short, this policy applies to any individual or entity having a direct or indirect contractual relationship with HIAS and any individual or entity that is funded, in whole or in part, with HIAS resources or that acts on HIAS' behalf at HIAS' direction.

This Policy forms a part of an employee's terms and conditions of employment and may be subject to change at the discretion of management. Adherence to this Policy is mandatory, and non-compliance could lead to termination of employment with HIAS, and/or other legal or disciplinary action at HIAS' discretion. Every HIAS Person is responsible for reading, understanding, and complying with this policy. HIAS managers are responsible for ensuring that staff who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them.

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<sup>1</sup> 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.

HIAS Partners must abide by this Policy and must take steps to prevent activity described in this Policy by staff and must also cooperate fully with any investigations of violations. HIAS may take appropriate steps to monitor and detect violations by Partners, including reviewing plans for ensuring compliance with anti-trafficking regulations.

This policy supersedes the “HIAS Anti-Human Trafficking Guidance.”

### III. Policy

HIAS strictly prohibits and adopts a zero-tolerance policy regarding the following:

1. Engaging in human trafficking
2. Any offer to exchange, or actual exchange, of money, employment, goods or services for sex, sexual favours or other forms of humiliating, degrading or exploitative behaviour, even when such transactions would be legal and/or consensual in the jurisdiction where they would occur
3. Using forced labor in the performance of any work for HIAS
4. Denying an employee access to identity documents
5. Using misleading or fraudulent recruitment practices
6. Using recruiters that do not comply with U.S. or HIAS country office labor laws
7. Charging employees recruitment fees
8. Providing or arranging housing that fails to meet host country housing safety standards
9. Where the law requires it, failing to provide a written contract of employment or proof of employment
10. Failing to pay contractually agreed return transportation costs for certain employees who have finished employment outside that employee’s nation of residence
11. Failing to pay wages that meet host-country legal requirements

### IV. Definitions

1. Human trafficking: 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 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. Exploitation includes involuntary servitude, peonage, debt bondage or slavery, the removal of organs, and sex trafficking or other forms of exploitation.
2. Commercial sex act: Any sex act on account of which anything of value is given to or received by any person
2. Forced labor: Situations 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

### V. Reporting

HIAS Persons who have a reasonable belief that an act in violation of this Policy has been committed should report the matter pursuant to the processes set out in the HIAS Whistleblowing Policy. This policy can be found at: [HIAS Whistleblowing Policy \(English\).docx \(sharepoint.com\)](#). Anonymous reporting is available at [www.hias.ethicspoint.com](http://www.hias.ethicspoint.com) or [ethics@hias.org](mailto:ethics@hias.org). Where appropriate, both HIAS Persons and Partners also have available the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

HIAS reserves the right to create additional standard operating procedures (“SOPs”) for the reporting, remediation, and investigating of violations of this Policy. Such SOPs, whether existing now or in the future, are incorporated herein by reference.

## VI. Enforcement

HIAS Persons who violate this Policy may be subject to the disciplinary action up to and including termination of employment. HIAS Partners that violate this Policy may have their relationship with HIAS terminated.

Additionally, a violation of this Policy may be referred to local or federal authorities, such as the police or a federal law enforcement agency, if the conduct is also considered a criminal act.

HIAS prohibits retaliation against anyone who reports any violation of this policy or who cooperates with any investigation of such reports. HIAS also prohibits knowingly making a false report under this Policy. HIAS Persons who engage in any retaliation or false reporting will be subject to disciplinary action up to and including termination of employment. HIAS Partners that engage in any retaliation or false reporting will be subject to termination of the relationship.

## VII. Questions

For any questions, comments, or concerns about this Policy, please contact OGC.