
Combatting Trafficking in Human Persons Awareness Program and Compliance Policy

Revision 4, Dated 22 August 2022

The United States Government and Schleifring North America LLC (SNA) has adopted a zero-tolerance policy regarding trafficking in persons. Human trafficking, otherwise known as modern slavery, has no place in our business. The attached information paper provides SNA employees, agents, consultants and subcontractors information regarding human trafficking, including what to look for and what to do when it is detected.

Definitions

The following terms defined herein are provided for context and clarity and should be applied when associated with this Policy to help in understanding the requirements. Additional definitions and examples are provided in Appendix I.

Human Trafficking: The recruitment, enticement, harboring, transporting, providing, obtaining, or maintaining, advertising, patronizing, or soliciting of a person, through the use of force, fraud, or coercion for the purpose of exploitation.

Labor Trafficking: The recruitment, enticement, harboring, transporting, providing, obtaining, or maintaining, advertising, patronizing, or soliciting of a person for labor 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, enticement, harboring, transporting, providing, obtaining, or maintaining, advertising, patronizing, or soliciting of a person, through the use of force, fraud, or coercion [or of a person who has not attained 18 years of age] for the purpose of a commercial sex act.

Commercial Sexual Exploitation of Children: Sexual abuse where remuneration in cash or in kind is made to the child or a third person(s). This includes prostitution, pornography, sex tourism, and other forms of human trafficking.

SNA Policy:

No employee, agent, consultant or subcontractor may:

- Use or allow the use of any of SNA's facilities, resources or equipment (including SNA's manufacturing equipment, computers and networks) for the viewing, storage, distribution, promotion or other use of materials in which children are depicted as engaging in any sexual act or are otherwise made an object for prurient interests;
- Enter into, on behalf of SNA, or otherwise, any business relationships or any other arrangement with any organization which the employee, agent, consultant or subcontractor has reason to believe participates in any way in human trafficking and the commercial sexual exploitation of children; or
- Use or allow the use of images or concepts that sexually exploit children.
- All employees, agents, consultants or subcontractors must be vigilant and immediately report to Human Resources and/or the President, as appropriate, all situations that come to their attention in SNA's premises or businesses where human trafficking and the commercial sexual exploitation of children is suspected or appears to be intended.
- Under no circumstances may SNA's funds, property (including electronic devices and SNA's supported technology) or personnel be used to further or support activities that participate in human trafficking and/or child exploitation.
- Child Labor Exploitation: SNA does not recruit child labor and supports the elimination of exploitative child labor. SNA will cooperate with law enforcement authorities to address any such instances of exploitation of which SNA becomes aware.

- Any such violation of this policy, or failure to report a violation of this policy, will result in immediate termination of employment or termination of the contractual arrangement, as applicable.

SNA Employee Obligations:

- (1) Read and understand Awareness Program material (overleaf);
- (2) Understand the process to report possible human trafficking violations without fear of retaliation (directly to President, Human Resources or ethics@schleifringna.com);
- (3) Sign the SNA on-boarding form to confirm you have read this Policy;
- (4) Comply with SNA's zero-tolerance policy.

REPORTING

Any SNA employee who has evidence of or suspects a violation of this Anti-Trafficking Policy or Anti-Kickback Act must report, in writing, his or her evidence or suspicion to the President, Human Resources or the ethics email address.

In addition, SNA has established and maintains Ethics & Business Conduct email address ("ethics@schleifringna.com") to facilitate confidential reporting of potential or actual unlawful, unethical conduct or other ethics issues.

Any employee, consultant, agent or subcontractor found to have violated either the U.S. Government's or SNA's Policy on trafficking will be subject to termination and the reporting of the violation to the appropriate authorities.

Executive Order to Strengthen Protections Against Human Trafficking

On September 25, 2012, an Executive Order (EO) was issued to address trafficking in persons by government contractors.

The EO sets forth a list of prohibited conduct and increases government oversight by requiring contractors to provide more information about their current employees.

The EO explicitly prohibits federal contractors, contractor employees, subcontractors and subcontractor employees from engaging in "trafficking-related activities."

Housing Plan

SNA's current foreign suppliers comply with host country labor laws and does not provide housing in kind for its employees. If SNA engages a new subcontractor that performs the subcontract outside the United States, it will perform due diligence on the subcontractor to ensure that it meets the housing plan requirements of FAR 52.222-50.

Recruitment and Wage Plan

SNA's current foreign suppliers comply with host country labor laws, including laws regarding wages and recruitment practices. If SNA engages a new subcontractor that performs the subcontract outside the United States, it will perform due diligence on the subcontractor to ensure it meets the recruitment and wage plan requirements of FAR 52.222-50.

Additional Information

Additional information about trafficking in persons may be found at the website for the Department of State's Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip> Department of Defense Guidance to Contractors and Subcontractors on Trafficking in Persons may be found at <http://ctip.defense.gov/>

Global Human Trafficking Hotline (from the FAR):	1-844-888-FREE	help@befree.org
Human Trafficking Hotline:	1-888-373-7888	
U.S. Department of Homeland Security:	1-866-347-2423	
ICE HIS Tip Line:	1-802-872-619	
National Center for Missing & Exploited Children:	1-800-THE-LOST	



What is human trafficking?

Over the past 15 years, “trafficking in persons” and “human trafficking” have been used as umbrella terms for activities involved when someone obtains or holds a person in compelled service.

The United States’ Trafficking Victims Protection Act (TVPA) describes this compelled service using a number of different terms: involuntary servitude, slavery, debt bondage, and forced labor. Under the TVPA, individuals may be trafficking victims regardless of whether they once consented, participated in a crime as a direct result of being trafficked, were transported into the exploitative situation, or were simply born into a state of servitude. At the heart of this phenomenon are the myriad forms of enslavement – not the activities involved in international transportation.

Major forms of human trafficking include:

Forced Labor

Recent studies show the majority of human trafficking in the world takes the form of forced labor. Also known as involuntary servitude, forced labor may result when unscrupulous employers exploit workers made more vulnerable by high rates of unemployment, poverty, crime, discrimination, corruption, political conflict, or cultural acceptance of the practice. Immigrants are particularly vulnerable, but individuals also may be forced into labor in their own countries. Female victims of forced or bonded labor, especially women and girls in domestic servitude, are often sexually exploited as well.

Sex Trafficking

Sex trafficking comprises a smaller but still very significant portion of overall human trafficking. When an adult is coerced, forced, or deceived into prostitution – or maintained in prostitution through coercion – that person is a victim of trafficking. All of those involved in recruiting, transporting, harboring, receiving, or obtaining the person for that purpose have committed a trafficking crime. Sex trafficking can also occur within debt bondage, as women and girls are forced to continue in prostitution through the use of unlawful “debt” purportedly incurred through their transportation, recruitment, or even their crude “sale,” which exploiters insist they must pay off before they can be free.

It is critical to understand that a person’s initial consent to participate in prostitution is not legally determinative: if an individual is thereafter held in service through psychological manipulation or physical force, that person is a trafficking victim and should receive the benefits outlined in the United Nations’ Palermo Protocol and applicable laws.



James Wasserman

Bonded Labor

One form of coercion is the use of a bond, or debt. Often referred to as “bonded labor” or “debt bondage,” the practice has long been prohibited under U.S. law by its Spanish name – *peonage* – and the Palermo Protocol calls for its criminalization as a form of trafficking in persons. Workers around the world fall victim to debt bondage when traffickers or recruiters unlawfully exploit an initial debt the worker assumed as part of the terms of employment. Workers may also inherit debt in more traditional systems of bonded labor.

Debt Bondage Among Migrant Laborers

Abuses of contracts and hazardous conditions of employment for migrant laborers do not necessarily constitute human trafficking. However, the burden of illegal costs and debts on these laborers in the source country, often with the support of labor agencies and employers in the destination country, can contribute to a situation of debt bondage. This is the case when the worker’s status in the country is tied to the employer as a temporary worker in the context of employment-based temporary work programs.

Involuntary Domestic Servitude

A unique form of forced labor is the involuntary servitude of domestic workers, whose workplace is informal, connected to their off-duty living quarters, and not often shared with other workers. Such an environment, which often socially isolates domestic workers, is conducive to nonconsensual exploitation since authorities cannot inspect private property as easily as formal workplaces. Investigators and service providers report many cases of untreated illnesses and, tragically, widespread sexual abuse, which in some cases may be symptoms of a situation of involuntary servitude. International efforts are ongoing to ensure that not only are administrative remedies enforced but also criminal penalties are enacted against those who hold others in involuntary domestic servitude.



Indian children work at a construction site in New Delhi, India. The construction project is one of many aimed at enhancing the city's sporting and transport infrastructure in advance of the October 2010 Commonwealth Games. Migrant workers from all over India are being paid below the minimum wage and are living and working in substandard conditions to complete these projects.

Forced Child Labor

Most international organizations and national laws recognize children may legally engage in certain forms of work. There is a growing consensus, however, that the worst forms of child labor should be eradicated. The sale and trafficking of children and their entrapment in bonded and forced labor are among these worst forms of child labor. A child can be a victim of human trafficking regardless of the location of that nonconsensual exploitation. Indicators of possible forced labor of a child include situations in which the child appears to be in the custody of a non-family member who has the child perform work that financially benefits someone outside the child's family and does not offer the child the option of leaving. Anti-trafficking responses should supplement, not replace, traditional actions against child labor, such as

remediation and education. However, when children are enslaved, their abusers should not escape criminal punishment by virtue of longstanding administrative responses to child labor practices.

Child Soldiers

Child soldiering can be a manifestation of human trafficking where it involves the unlawful recruitment or use of children – through force, fraud, or coercion – as combatants or for labor or sexual exploitation by armed forces. Perpetrators may be government forces, paramilitary organizations, or rebel groups. Many children are forcibly abducted to be used as combatants. Others are made unlawfully to work as porters, cooks, guards, servants, messengers, or spies. Young girls can be forced to marry or have sex with male combatants. Both male and female child soldiers are often sexually abused and are at high risk of contracting sexually transmitted diseases.

Child Sex Trafficking

According to UNICEF, as many as two million children are subjected to prostitution in the global commercial sex trade. International covenants and protocols obligate criminalization of the commercial sexual exploitation of children. The use of children in the commercial sex trade is prohibited under both U.S. law and the Palermo Protocol as well as by legislation in countries around the world. There can be no exceptions and no cultural or socioeconomic rationalizations preventing the rescue of children from sexual servitude. Sex trafficking has devastating consequences for minors, including long-lasting physical and psychological trauma, disease (including HIV/AIDS), drug addiction, unwanted pregnancy, malnutrition, social ostracism, and possible death.



Free the Slaves/Kay Chernush