



Room to Read Policy

Policy Name: ANTI-TRAFFICKING POLICY AND COMPLIANCE PLAN

Policy Owner: Chief Financial Officer

Revision Date: January 2023

Policy Number: 102WW

Purpose:

Human trafficking is both a crime and a human rights violation in which victims are deprived of their humanity and basic freedoms. Room to Read strongly supports the human rights of every individual and has adopted a zero-tolerance policy on human trafficking. The purpose of this Policy is to inform employees about human trafficking activities, prohibited conduct, our compliance plan, our awareness program, consequences of violations, reporting requirements, and the reporting process whereby employees can report, without fear of retaliation, any suspected trafficking related activities or other conduct that violates this Policy.

Applicability:

This Anti-Trafficking Policy and Compliance Plan (“Policy”) applies to Room to Read worldwide.

Policy:

Room to Read employees are strictly prohibited from engaging in trafficking-related activities. Room to Read applies the definition of trafficking-related activities used by the U.S. Government (currently found [here](#)). These activities include:

1. Recruitment, harboring, transportation, provision, or obtaining of a person for forced labor or service, debt bondage, involuntary servitude, sex trafficking or slavery;
2. Procurement of commercial sex acts, which means any sex act for which anything of value, such as money, food, or favors, is given or received by any person;
3. Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or with a person under the age of 18; and
4. Use of forced labor or service, which means any labor or service obtained using actual or threatened physical or other serious harm, actual or threatened abuse of the law or legal process, or by fraudulent or misleading recruitment practices.

Compliance Plan¹:

To prevent trafficking, all Room to Read employees must strictly adhere to the practices set out in this Policy.

Recruitment Practices

Room to Read prohibits the use of fraudulent or misleading recruitment practices. Room to Read employees must fully and accurately disclose, in a format and language understood by the employee, all key terms and conditions of employment, including: wages and benefits; work location; living conditions, housing, and associated costs (if provided or arranged by Room to Read); significant costs to be charged to the employee; and, if applicable, the hazardous nature of the work.

¹ In most cases, the compliance plan set out in this Policy will be sufficient. However, the U.S. Government requirements require employees to consider the size and complexity of the particular program or operations, and the nature and scope of activities (including the risk of involvement of persons susceptible to trafficking) and adopt more stringent requirements if necessary.

Room to Read shall only use recruiters with trained employees, who comply with the Recruitment Practices in this Policy (including the prohibition of charging fees to employees) and who comply with the labor and employment laws of the country in which the recruitment takes place (including wages and benefits).

Room to Read prohibits charging recruitment fees to any employee.

Room to Read prohibits destroying, concealing, confiscating, or otherwise denying an employee access to his or her identity or immigration documents, such as driver's license or passport.

Where required by law or contract, Room to Read provides employees with an employment contract or other required work documents, written in a language the employee understands, containing all required information about the terms and conditions of employment and employees' rights. If the employee must relocate to perform the work, Room to Read will provide the required documents at least five (5) days prior to relocation.

Wage Practices

Room to Read complies with applicable local labor and employment laws, including wage laws.

Transportation Practices

Room to Read will provide or pay the cost of return transportation at the end of employment for any employee who is: (i) not a national of the country in which the work took place and was brought into that country to work on a U.S. government contract or subcontract; or (ii) not a national of the U.S. and was brought into the U.S. to work on a U.S. government contract or subcontract, if payment is required under existing temporary work programs or under a written agreement with the employee. This does not apply to an employee who is legally permitted to remain in the country of employment and who chooses to do so, or to an employee who is otherwise exempted by law. Return transportation for an employee not working on a U.S. government contract or subcontract will be provided in accordance with Room to Read's International Assignment Policy.

Housing Practices

If Room to Read provides or arranges for housing for an employee, the housing will meet local housing and safety standards.

Supplier Compliance

The U.S. Government has adopted a zero-tolerance policy regarding trafficking in persons ("TIP"). All vendors, consultants, agents, contractors, subcontractors, and sub-recipients (each referred to as "Supplier" in this Policy) acting as Supplier to Room to Read in connection with any U.S. Government contract, cooperative agreement, or award must agree to comply with all applicable U.S. laws relating to TIP. Room to Read will include all applicable TIP provisions in such Supplier agreements.

Many other governments and private organizations have also adopted a zero-tolerance policy regarding trafficking. Room to Read will comply, and will require its Suppliers to comply, with all applicable anti-trafficking requirements in connection with any contract, award, or other agreement with any such government or private organization.

All Room to Read employees are required to follow procedures to prevent Suppliers from engaging in TIP, exercise due diligence in monitoring Suppliers for signs of trafficking activities and must report any suspected trafficking activity or violations of applicable trafficking laws or contract provisions using the reporting procedures described below. If any Supplier fails to comply with any applicable trafficking law or provision, Room to Read will take appropriate action to remedy the violation and prevent future violations, including but not limited to: requiring the Supplier to remove an employee or agent from a project; requiring the Supplier to terminate its relationship with any other Supplier; suspending payments to the Supplier until the violation is remedied; or terminating the Supplier.

Employee Awareness

All Room to Read employees are required to read and acknowledge the Policy at the time of hire and Room to Read provides training on the Policy (including the U.S. Government's policy, prohibited activities, reporting avenues and actions against violators) after starting employment and refresher as appropriate. In addition, a copy of the Policy is posted at each relevant Room to Read workplace worldwide, except where work is being performed in the community or not otherwise at a fixed location. A copy of the Policy is also available on SharePoint and Room to Read's website.

Reporting Requirements and Procedure

All Room to Read employees are required to report any suspected trafficking activity or other violations of this Policy within 24 hours of becoming aware, via Room to Read's [Whistleblower Policy](#). Alternatively, reports may be made to the U.S. Government's suggested contacts: the Global Human Trafficking Hotline at 1-844-888-FREE or its email address at help@befree.org.

Room to Read's General Counsel will advise about any required notifications to government agencies and donors, including notification of information received from other sources, such as host country law enforcement. Room to Read employees shall cooperate with any internal investigations and any associated government/donor investigations.

Room to Read strictly prohibits retaliation against any employee who reports suspected trafficking activity or other violations of this Policy, or who cooperates with any internal or external investigations of such reports. Employees may do so without fear of reprisal. Room to Read employees who engage in any such retaliation are subject to disciplinary action, up to and including termination.

Consequences for Violations:

Employees who violate this Policy are subject to disciplinary action, including reduction in benefits and termination.

Contact Department:

Any questions regarding this Policy should be referred to the General Counsel.

Related Policies

- Child Protection Policy and Child Protection Code of Conduct
- U.S. Government's TIP awareness programs found at <http://www.state.gov/j/tip/>
- Supplier contract TIP terms