



Policy on Combating Trafficking in Persons

Purpose:

Establish Organization zero tolerance on forced labor and human trafficking.

Applicability:

All employees, Board members, subcontractors, sub recipients, consultants, vendors and agents worldwide.

Key Definitions:

"Human trafficking" means the recruitment, harboring, transportation, provision or obtaining 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 and sex trafficking.

A "commercial sex act" means "any sex act on account of which anything of value is given to or received by any person."

Policy Statement:

Organization has a zero-tolerance policy regarding human trafficking and forced labor in any form and is committed to working to mitigate the risk of human trafficking and forced labor in all aspects of the business. Company staff, Board members, subcontractors, sub recipients, consultants, vendors and agents must comply with the Requirements of relevant anti human Trafficking laws in Syria, Iraqi Kurdistan's ministry of the Interior's Directorate of Combating Human Trafficking 0096407509879911 , and US of Executive Order 13627, "Strengthening Protections Against Trafficking in Persons in Federal Contracts" codified in U.S. Government regulations and agency specific provisions (collectively "Trafficking Provisions"). To the extent the U.S. Government regulations, U.S. Government agency provisions or the Executive Order and this policy differ in their requirements, the stricter requirements must be followed.

Compliance Requirements:

Organization Prohibits

- Engaging in any form of human trafficking;
- Engaging in commercial sex acts as may be directly associated with Company, which includes during work hours, while attending off-site functions and any time in work travel status;
- Using forced labor;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents;
- Using misleading or fraudulent recruiting practices;



- Charging employee candidates recruitment fees for employment;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- Failing to provide an employment contract, recruitment agreement or similar work document in writing, in the employee’s native language if required, and if applicable, prior to the employee departing from his or her country of origin.

Roles and Responsibilities:

Employees are responsible for reading, understanding and complying with this policy as well as completing any associated training mandated as a condition of continued employment. When engaging outside parties, employees must ensure that the requirements of this policy are communicated to subcontractors, sub recipients, consultants, vendors and agents. Employees are also responsible for supporting the successful implementation of specific compliance plans and monitoring procedures, as applicable, to ensure compliance.

Communication and Reporting:

Employees should consult their supervisor supervisor, HR staff, or senior management if they are uncertain whether a specific action would be in violation of the Trafficking Provisions and/or this policy.

Employees have a responsibility to report, and may do so without fear of retaliation and with anonymity, any activity that violates the Trafficking Provisions or this policy to their supervisor, HR staff, or senior management or through Organization Hotline at Shar-dev.org/contact-us, or the Global Human Trafficking Hotline at 009647518429141 or its e-mail address at shar4development@gmail.com

Enforcement

Any violations of the Trafficking Provisions and/or this policy will result in disciplinary action which may include but is not limited to termination of employment for Company employees and termination of the relationship with Organization for non-employees.

Approval



Kadar Sheikmous 07/05/2020

(Name – signature above)

Date

Related Documents:

- <http://www.gpo.gov/fdsys/pkg/DCPD-201200750/pdf/DCPD-201200750.pdf>
- <http://www.usaid.gov/sites/default/files/documents/1868/303maa.pdf>
- http://www.ecfr.gov/cgi-bin/text-idx?SID=74ce1f65b9ca338ce298a8e4b34a82d5&mc=true&node=se48.2.52_1222_650&rgn=div8