Anti-Human Trafficking and Exploitation Policy

Effective Date	March 7, 2018	**Version**	2.1	**Version Date**	March 31, 2025
Responsible Team	Ethics and Compliance Department				**POLICY**
Supersedes	Version 2				
Policy Type	Tier 1 Policy			**Policy Number**	POL-1023

1. Purpose

Consistent with its mission to alleviate poverty, suffering and oppression, Prosper Global is committed to a work environment and operations that are free from exploitation, human trafficking, and modern slavery[1]. This includes involuntary servitude, debt bondage, child labor, and unlawful recruitment. Prosper Global has zero tolerance for human trafficking or exploitation in any part of our global organization or with any of our partners and is committed to addressing human trafficking and modern slavery in our operations and supply chains. This Policy sets forth the expectations we have of our team members to avoid engagement of, complicity in, or benefiting from human trafficking or exploitation.

2. Scope and Application

2.1. This Policy applies to Prosper Global (U.S.), Prosper Global (UK), and Prosper Global (NL), including their branches, subsidiaries, and controlled affiliates (together, "**Prosper Global**"); all Board Directors, officers, employees, seconded employees, interns, daily workers, and volunteers (collectively, "**Team Members**"); all subrecipients, partner organizations, contractors, consultants, agents, representatives, and other individuals acting on Prosper Global's behalf or at its direction (collectively, "Partners"); and all visitors to Prosper Global facilities or programs, including photographers, filmmakers, journalists, researchers, current and prospective donors, and other hosted guests ("**Visitors**").

2.2. This Policy applies to the above parties in all locations, at all times, both during and outside of working hours, and applies to current and past conduct.

[1] Note that 'modern slavery' is the term used in the United Kingdom Modern Slavery Act 2015. Prosper Global prefers not to use the term 'modern slavery' and therefore uses the terms 'human trafficking' and 'exploitation' in this Policy.

3. Policy Statements

3.1. Prosper Global expects all of its Team Members, Partners, and Visitors to demonstrate integrity, behave ethically at all times, and adhere to the highest standards of accountability and professionalism. Prosper Global has zero tolerance for any conduct which is abusive or exploitative. Prosper Global expects management to fully enforce adherence to these standards.

3.2. Prosper Global will comply with all laws and regulations prohibiting exploitation and trafficking in persons. Prosper Global is committed to the core principles of the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and International Labor Organization (ILO) standards, including those on forced labor and child labor.

3.3. Consistent with this Policy, Prosper Global prohibits any Team Member or Partner from engagement, complicity in, or benefiting from any practice that constitutes human trafficking or exploitation. The consent of a person trafficked is irrelevant.

3.4. **"Human trafficking"** is an umbrella term referring to both sex trafficking and forced labor. "Trafficking in persons" includes the recruitment, transportation (including failure to provide return transportation), transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of 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. The recruitment, transportation, transfer, harboring or receipt of someone under the age of 18 for the purpose of exploitation is also considered "trafficking in persons".[2]

3.5. **"Exploitation"** includes, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation; forced labor or services, including child labor, slavery or practices similar to slavery, involuntary servitude, debt bondage or the removal of organs.

3.6. Following the ILO definition, Prosper Global defines **"child labor"** as work that deprives children (anyone under the age of 18) of their childhood, their potential and their dignity and that is harmful to their physical and mental development. Child labor includes work that:

3.6.1. is mentally, physically, socially or morally dangerous or harmful to children; and/or

3.6.2. interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

For more detail on child labor and child safeguarding, see **Prosper Global's** Child Safeguarding Policy.

3.7. Examples of Team Member or Partner conduct that would violate this Policy because it contributes to trafficking in persons and/or exploitation, include (but are not limited to):

[2] Prosper Global uses the definition of Trafficking in Persons from the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons ('Palermo Protocol') (Article 3)

3.7.1. Procuring commercial sex acts;

3.7.2. Employing or engaging domestic help exploitatively, including using child labor domestically. (For an analysis of factors that make domestic help non-exploitative, Prosper Global references ILO Convention 189 concerning decent work for domestic workers (2013);

3.7.3. Using forced or exploitative labor in the performance of any contract, cooperative agreement or award;

3.7.4. Using child labor in any way or engaging with partners or vendors who use child labor;

3.7.5. Destroying, concealing, confiscating, or otherwise denying any employee access to his or her identity or immigration documents, such as passports or drivers' licenses;

3.7.6. Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by Prosper Global), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;

3.8. Using recruiters who do not comply with local labor laws of the country in which the recruiting takes place, withhold identity and/or travel documents or do not take steps to verify the age of applicants;

3.8.1. Charging applicants/candidates/employees recruitment fees;

3.8.2. If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;

3.8.3. If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or

3.8.4. If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

3.9. Team Members who violate this Policy will be subject to discipline, up to and including termination, and may be subject to criminal prosecution. Partners may have their agreements terminated, be prohibited from working with Prosper Global in the future and/or be subject to criminal prosecution.

3.10. Team Members and Partners must immediately report violations or suspected violations to Prosper Global's Integrity Hotline in accordance with Prosper Global's Speak Out! Policy. Prosper Global will not tolerate any form of retaliation against Team Members and Partners who report suspected violations of this Policy in good faith.

3.11. Prosper Global will report trafficking in persons and/or exploitation to the appropriate authorities and to donors as required, or if not required, as Prosper Global determines appropriate. Prosper Global will cooperate with all investigators and law enforcement in ensuring those responsible are held accountable.

4. Processes and Procedures Required to Ensure Compliance

4.1. Prosper Global ensures compliance with this Policy through appropriate processes and procedures, including:

4.2. Communicating this Policy to Team Members and making this Policy part of the Code of Conduct;

4.3. Maintaining a reporting hotline (www.mercycorps.org/integrityhotline), which allows Team Members and Partners to report allegations of trafficking or exploitation, including anonymously, and ensuring Team Members and Partners are aware of the hotline and how to use it, which is the responsibility of the Ethics and Compliance Department;

4.4. Maintaining a process detailing how allegations of trafficking and exploitation are to be reported, reviewed, investigated, and resolved in a systematic manner, which is the responsibility of the Ethics and Compliance Department;

4.5. Prosper Global will require its Partners to commit in writing to act in accordance with the Policy Statements in this Policy and to report to Prosper Global any allegations of trafficking or exploitation that (1) involve or are related to resources provided to the Partner by Prosper Global, or (2) involve any Prosper Global Team Member, which is the joint responsibility of Country and Grant Compliance teams;

4.6. Prosper Global will work with Partners to support training and/or capacity strengthening efforts in relation to compliance with this Policy and will conduct appropriate due diligence and monitoring of Partners to ensure they are not violating their commitments under this Policy, which is the responsibility of Country teams with the support of the Grant Compliance team;

4.7. Under Prosper Global Headquarters and Field Procurement policies and procedures, Prosper Global will set out appropriate due diligence requirements and risk mitigation measures to ensure and monitor compliance with this Policy.

4.8. Prosper Global will develop methods to monitor compliance with and demonstrate meaningful progress on the Policy, building on the key performance indicators identified in the Prosper Global Europe Modern Slavery Statement.

5. Related Policies, Procedures and Guidance

- Code of Ethics
- Prevention of Sexual Exploitation, Abuse and Harassment of Program Participants and Community Members Policy
- Child Safeguarding Policy
- Speak Out! Policy
- Field Procurement Policies and Procedures (FP3)
- Headquarters Procurement Policies and Procedures (HP3)

- Prosper Global Europe Modern Slavery Statement

6. Roles and Responsibilities

6.1. All Team Members are responsible for complying with this Policy and completing the mandatory training. All Team Members are responsible for reporting any suspected violations of this Policy in accordance with Prosper Global's Speak Out! Policy. Anyone at any time can report suspected violations of this Policy directly to the Ethics Team and Compliance Department via prosperglobal.org/integrityhotline.

6.2. The Ethics and Compliance Department is responsible for:

6.2.1. maintaining this Policy;

6.2.2. communicating this Policy to Team Members;

6.2.3. maintaining a reporting hotline (www.mercycorps.org/integrityhotline), which allows Team Members and Partners to report allegations of trafficking and exploitation anonymously, and ensuring Team Members and Partners are aware of the hotline and how to use it;

6.2.4. conducting training on this Policy for all Team Members;

6.2.5. supporting senior management in all countries and areas where Prosper Global operates on the implementation and compliance with this Policy;

6.2.6. jointly with the People Team, requiring all Team Members to certify that they understand this Policy and are compliant with it.

6.3. Senior management in all countries and areas where Prosper Global operates are responsible for:

6.3.1. Overseeing the full implementation of this Policy in their area of operations, with the support of the Ethics and Compliance Department, which includes ensuring Team Members are trained on this Policy, and ensuring that safe and lawful, non-exploitative recruitment measures are in place.

6.3.2. Ensuring that all allegations of human trafficking, exploitation, or other violations of this Policy are immediately reported to the Ethics and Compliance Department;

6.3.3. Creating and maintaining an environment and culture that promotes dignity and respect and prevents any form of exploitation and abuse.

6.3.4. Ensuring that all Team Members undergo the code of conduct training and sign the Code of Ethics certification.

6.4. The People Team is responsible for ensuring that appropriate recruiting processes are in place, including background and Misconduct Disclosure Scheme checks as applicable.

6.5. Global Procurement is responsible for ensuring that procurement processes are in place and followed, in particular ensuring that there are appropriate due diligence requirements and risk

mitigation measures in relation to our supply chain (including the identification of 'high risk' suppliers).

7. Policy Governance

Version 2 of the Policy was approved by the Prosper Global Board on March 7, 2023.

RESPONSIBLE TEAM	Ethics and Compliance Department		
POLICY OWNER	Senior Director of Safeguarding & Director of Compliance, Governance and Risk		
EXECUTIVE SPONSOR	Chief Ethics and Compliance Officer		
POLICY APPROVER	Prosper Global Board	**DATE APPROVED**	March 7, 2023
ORIGINAL POLICY	Original Policy approved March 2018		
LAST REVIEWED	March 19, 2025		
NEXT FORMAL REVIEW DATE	March 20, 2027		