

Prohibition on Human Trafficking, Forced Labour and Child Labour

Purpose of the policy

The purpose of this policy is to describe Territory Instrument's (TI) commitments to comply with, and respect individuals' rights under, Human Trafficking, Forced Labor and Child Labor laws, and your responsibilities to help Territory Instruments comply with these laws.

Policy

TI and its employees shall not (i) tolerate, engage in or support Human Trafficking, Forced Labor or Child Labor of any kind through TI's activities, including in its supply chain, or (ii) assist TI clients or any other party in doing so.

TI shall respect its employees' rights to agree to terms and conditions of employment voluntarily without coercion, and freely terminate their employment on appropriate notice. TI may recover a portion of training or other employment costs incurred by TI from certain employees who leave within a defined period (subject to any local laws and international labor standards). TI shall ensure that its employees are of legal working age for their position and shall comply with local laws for youth employment or student work, such as internships or apprenticeships.

Additional obligations

In some countries, local laws impose additional obligations on TI regarding compliance with Human Trafficking, Forced Labor and Child Labor laws which may include, among other things, (i) implementing certain measures (e.g.,

compliance plans, specific clauses in agreements with third parties, annual certifications, etc.) when entering into contracts with or in support of governments; (ii) making disclosures to the government that Human Trafficking, Forced Labor and Child Labor are not occurring at Territory Instruments or within Territory Instruments supply chain; and (iii) reporting activity to the government that is inconsistent with these laws.

Violations of this policy and raising concerns

TI takes this policy very seriously and violations may lead to disciplinary action up to, and including, termination of employment. While TI retains discretion as to how to respond to any violation of this policy, any disciplinary process will be undertaken in accordance with all applicable local laws and other legal requirements. If you have a concern about any issue that you believe (or suspect) may violate any law or violate TI Code of Business Ethics or this or any other TI policy, you have a right to speak up and we want you to speak up. You can always raise any concern, or ask for advice or support, through your line management (including, for example, your supervisor or a TI Leader)

Definitions

We use the following words and phrases in this policy:

“Child Labor” means labor that deprives children (generally all people under 18 years of age, subject to certain exceptions) of their childhood, their potential and their dignity, and that is harmful to physical or mental development. It includes work that (i) is mentally, physically, socially or morally dangerous and harmful to children, and (ii) interferes with their schooling. Whether certain work constitutes harmful or illegal child labor varies from country to country and depends on, among other things, the child’s age, the type of work performed, the number of hours worked and the conditions under which the child works. Child Labor does not include youth employment or student work, such as internships or apprenticeships, which comply with local laws and regulations.

“**Forced Labor**” means all work or service exacted from a person under threat or penalty (including slavery, servitude and forced recruitment), which includes penal sanctions and the loss of rights and privileges where the person has not offered himself or herself voluntarily.

“Human Trafficking” means the act of recruiting, harboring, transporting, providing or obtaining a person for forced labor or commercial sex acts through the use of fraud, coercion (e.g., threats of serious harm or physical restraint or abuse or threatened abuse of the legal system) or deception.

“Human Trafficking, Forced Labor and Child Labor laws” means the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (the “Palermo Protocol,” supplementing the United Nations Convention against Transnational Organized Crime of 2000), the European Convention on Human Rights (1953), the Council of Europe Convention on Action Against Trafficking in Human Beings of 2005, the Forced Labour Convention of 1930 (No. 29) and Abolition of Forced Labour Convention of 1957 (No. 105), the EU Directive on Preventing and Combating Trafficking in Human Beings (2011/36/EU), the EU Directive Regarding Disclosure of NonFinancial and Diversity Information (2014/95/EU), the Minimum Age Convention, 1973 (No. 138), the Worst Forms of Child Labour Convention, 1999 (No. 182), the United Nations Global Compact.

Stuart Kenny
Director
March 2021