



ANTI MODERN SLAVERY POLICY

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Scope and Purpose

Reaffirming the organisational and behavioural principles, commitments and obligations set out in the overarching INTERSOS Safeguarding Framework, this policy specifically sets out INTERSOS' approach to **prevent and tackle acts of modern slavery** in relation to INTERSOS programme, employment, and supply chains. This policy applies to all INTERSOS employees (international, national and personnel at country, regional and HQ level), interns, volunteers, consultants, contractors, board members, third-party representatives, suppliers, and business partners, all of whom have a duty to comply with this and other policies designed to prevent modern slavery. Where employees or staff are referred to in this document, these groups of people are included.

For the purposes of this policy, unless otherwise stated, INTERSOS adopts the following description of Modern Slavery:

Modern Slavery is a term used to encapsulate slavery, servitude and forced or compulsory labour; and human trafficking¹.

- **Slavery and servitude:** this is when people are dehumanised, treated as a commodity, bought, or sold as “property”, have restrictions placed on their freedom or are generally exploited for someone else’s gain. Slavery often involves Forced or Compulsory Labour.
- **Forced or Compulsory Labour:** this is when someone is forced to work, or is otherwise controlled by an “employer”, through coercion, mental or physical abuse, or the threat of abuse.
- **Human trafficking:** relates to arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even when the victim/survivor consents to the travel. This reflects the fact that a victim/survivor may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain. INTERSOS Charter of Values and Code of Conduct guide our commitment to prevent acts of modern slavery in our supply chains or in any part of our business, based on the principles within the Universal Declaration of Human Rights- Article 4, and other international protocols, conventions and directives. **INTERSOS has a zero-tolerance approach to tackling the practice of modern slavery, child labour, trafficked, bonded, or compulsory labour in any of its forms.** INTERSOS is committed to acting ethically and with integrity in all its business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere in its own programmes or in any of its supply chains and expect the same high standards from all of its contractors, suppliers, and other business partners.

¹ The Italian government has criminalised human trafficking in line with international definition in article 601 of its penal code, as amended by Legislative Decree No. 24 of March 2014. Forced labour is criminalised under articles 600, 601, and 603 and slavery is criminalised in article 600 and 602, which criminalise placing or holding a person in conditions of slavery or servitude, and the sale and purchase of slavery respectively.

Application

Core Principles:

This Policy is underpinned by the core principles outlined below:

- INTERSOS requires all its staff, partners, and suppliers to have **Zero tolerance to inaction on exploitation**. This includes all forms of modern slavery and human trafficking through robust prevention and response work, offering support to workers and holding those responsible to account.
- INTERSOS requires anyone carrying out its work to **report any concerns**. There is no requirement to have evidence or know that the incident is definitely modern slavery or human trafficking; all reports will be investigated by specialised staff so that the appropriate action is taken.
- No worker should pay for a job - **the costs of recruitment should be borne**, not by the worker, but **by the employer**.
- **Wages should be paid directly to the worker**; where INTERSOS is not the direct employer, appropriate checks shall be in place to ensure the worker receives the correct wage.
- **No compulsory deductions from wages shall be made that are not mandated by law** and the worker should still have enough to live on after all deductions have been made.
- **Workers shall not be held in debt bondage or forced to work** for an employer to pay off an incurred or inherited debt.
- **Coercion or force shall not be used** to physically confine or imprison workers to the workplace, accommodation, or related premises.
- Workers shall have the **freedom to leave their employment** within the terms of their contract and may not be prevented from doing so.
- Workers have the **right to enter into employment voluntarily and freely**, without the threat of a penalty.
- **No worker shall have his/her identity or immigration documents destroyed**, concealed, confiscated, or otherwise denied to them.
- Working conditions and **accommodation shall be safe, clean, and protect workers' welfare** and needs, in line with INTERSOS housing and safety standards.
- No worker shall be solicited for the purpose of employment, **on the basis of deception, coercion, or abuse of their position of vulnerability**. No worker shall be offered employment, by means of materially false or fraudulent pretences, or representations or promises regarding that employment.

Commitments

Prevention

- **Raise awareness** across INTERSOS staff, partners and suppliers about Modern Slavery and ways to bring forward any concerns about INTERSOS supply chain activities.
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- Ensure that its standard tender documentation includes a provision for the **discretionary exclusion of any bidder** who has been convicted of an offence associated to Modern Slavery²
- As part of the pre-qualification and bidding processes, all potential contractors shall be required to submit—together with the official documentation - the **Supplier/Tenderer's declaration** to the effect they are aware and formally agree to abide by the ethics clauses specified in the INTERSOS Organisation Management and Control Model and INTERSOS Code of Conduct, and commit to immediately inform INTERSOS if any change occurs in this respect at any stage of the award process or during the fulfilment of the contract itself.
- Where possible, an independent **background check** of the contractor's business practices shall be conducted to inform the pre-qualification assessment or bid analysis.
- The Supplier/Tenderer's Declaration and the information from a possible independent background check will be used by the Evaluation Committee in the selection process. Copies of all official documentation shall be kept on file.
- In compliance with applicable laws, INTERSOS is committed to **prevent perpetrators of Modern Slavery or trafficking from being hired, (re)hired or (re)deployed**. Managers and Human Resource teams will ensure robust recruitment screening processes (e.g., pre-screening using Criminal History Checks or similar) for all personnel, including employees, volunteers, consultants, and other representatives.
- INTERSOS' **employment and remuneration practices will be fair and transparent** across all programmes/countries.
- INTERSOS shall ensure that, when engaging in **partnerships, sub-grant or sub-recipient agreements**, these agreements: (i) incorporate this Policy as an attachment; (ii) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide by a Code of Conduct that is pursuant to the standards of this Policy; and (iii) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against modern slavery, to investigate and report allegations thereof, or to take corrective actions when modern slavery has occurred, shall constitute grounds for INTERSOS to terminate such agreements. (iv) INTERSOS shall include assessments on partner capacity including existing Safeguarding policies, procedures, and training and, when not in place, will provide the related capacity building and support as part of entering any new partnership.
- All INTERSOS **programmes** shall be designed and implemented to **minimise actual or potential risks which might lead to modern slavery** by INTERSOS staff, partners, contractors, and suppliers. This includes conducting programme and projects risks assessments and partners and contractors' due diligence, partners, and contractors' due diligence, embedding good practice and prevention measures throughout the programme and project cycle, including project design, grant proposals, assessments, complaints and feedback mechanisms, and monitoring and evaluation.

Reporting

- All INTERSOS staff, partners and suppliers are **obliged to report any concerns** they have about modern slavery and trafficking in INTERSOS supply chain within 24 hours of becoming aware of

² In January 2016, Italy passed Law No. 50 of 18 April 2016 (**Decreto Legislativo n. 50**, 18 Aprile 2016), that implements the 2014/23, 2014/24, and 2014/25 EU directives on **public procurement**. 90 Article 80 of the new law establishes that contracting authorities shall exclude an economic operator from participation in a public procurement procedure if the operator was convicted by final judgment for child labour or human trafficking

an alleged incident. Failure to report, to a relevant person, suspicion of modern slavery relating to someone else is a breach of INTERSOS policy and could lead to disciplinary action being taken.

- **Victims' and survivors' safety and wellbeing** must be paramount to reporting and their information treated confidentially. Whistle-blowers must similarly feel safe and protected during the reporting process.
- Any intentionally false, malicious, or vexatious statement, misrepresentation or accusation against another INTERSOS personnel member or third party will be sanctioned.
- **Complaints can be made anonymously.** Information that identifies individuals involved in a complaint shall be limited to personnel with the absolute need to have such information and shall not be shared further without obtaining the **informed consent** of the victim/survivor, except if someone's life is at risk, or as required by law in consultation with legal counsellor and where safe to do so. Non-identifying information will be shared as per donor and regulatory body reporting requirements. Employees who breach **confidentiality** may be subject to disciplinary action up to and including termination of employment.

Response

- **All concerns or allegations** shall always be **taken extremely seriously**, and investigated and acted upon where appropriate, through trained investigators, recognising the rights and duty of care to everyone involved, including complainant and/or victim/survivor, witnesses, and subject of complaint and in line with our principles outlined in this and other relevant policies.
- Disciplinary action shall be taken against any employee who is found to have committed any act of modern slavery and a serious breach of this Policy may be treated as **gross misconduct up and to dismissal**.
- The **safety and security of the victim/survivor** and her/his children is the primary consideration.
- The victim/survivor always be **involved in the decision-making process** and be provided with comprehensive information.
- The victim/survivor's **privacy and confidentiality** shall be protected at all times.
- All actions taken shall be guided by respect for the choices, wishes, rights and dignity of the victim/survivor.
- Victims/survivors shall receive **equal and fair treatment** regardless of their sex, gender identity and expression, age, nationality, skin colour, social or ethnic origin, religion, language, marriage or civil partnership, religion or belief, membership of a trade union, disability, personal or family care needs, pregnancy, motherhood, or fatherhood (including adoption), and sexual orientation.
- Victims/survivors of Modern Slavery are entitled to **specialised support services**. INTERSOS commits to provide or refer victims/survivors to competent support services as appropriate and available and according to the wants and the needs of the victim/survivor. Support may include specialist psychosocial support such as counselling, medical assistance, legal counselling, help to secure alternative jobs or income, including access to financial or in-kind assistance, on a case-by-case basis. Assistance shall be made available regardless of whether a formal internal response is carried out (such as an internal investigation).
- Acts of modern slavery and trafficking may result in **criminal prosecution within applicable jurisdiction. If appropriate and safe, INTERSOS will involve the police**, where there are suspicions of serious and organised criminal involvement.
- All allegations of acts of modern slavery, and subsequent follow-up, will be documented in a **secure and confidential database** to ensure accountability.

- All reported allegations be acknowledged within 24 hours, and a safeguarding team will convene a case conference to assess immediate risks and next steps within 72 hours.
- INTERSOS may **terminate relationship with partners, contractors, and suppliers** if they breach this policy.
- Where the victim/survivor is employed/ recruited through a supplier/ implementing partner, it will be the **responsibility of the supplier/ partner to provide remedy**, with support from INTERSOS to those who will seek to ensure that remediation is in line with this policy

Roles and Responsibilities

In addition to the roles and responsibilities outlined in the INTERSOS Safeguarding Framework, the following functions will have dedicated responsibilities to help INTERSOS prevent and respond to acts of modern slavery:

INTERSOS Board hold overall accountability for this policy and its effectiveness in practice.

All INTERSOS Directors/Head of Missions are responsible for integrating its implementation into daily decisions and for promoting awareness of this policy within their departments, country programmes or teams and with suppliers and partners.

All INTERSOS staff, partners and suppliers are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report modern slavery concerns is grounds for disciplinary action pursuant to the INTERSOS Charter of Values, Code of Conduct, Safeguarding Framework and Associated Policies. This action may include termination of contract or summary dismissal and may result in the case being forwarded to the local authorities for criminal prosecution when appropriate and in accordance with applicable national laws.

TO REPORT A CONCERN, YOU CAN:

- Do this verbally or in writing to your Line Manager, HR, country programme staff with safeguarding responsibilities or
- Send an email to: complaint@intersos.org or
- Send a WhatsApp message to: +39 3808970033
- Fill an incident report and put it in one of INTERSOS feedback boxes.

REFERENCES

This policy should be read in conjunction with the following documents: Safeguarding Framework, Code of Conduct, Charter of Values, Misconduct Policy, Whistleblowing and Investigation Policy, Management model, Procurement guidelines, PSEAH Policy, Child Safeguarding Policy.

Approval and dates

This policy was approved on 6 December 2023. This version of the policy takes effect on 23 March 2024 and will be reviewed in 36 months' time.

Policy Owner

Internal Auditor
