



PRC057	Anti-Human Trafficking Policy		
Document owner: Mieke Uitterlinden		Review Date: 2022-06-11	Version: 1

Purpose

Excis is committed to a work environment that is free from human trafficking and slavery. Excis will not and does not tolerate or condone human trafficking – a modern-day form of slavery – in any part of its organization or business relationships. Trafficking in persons is an international crime involving the acquisition of a human being through the use of force, fraud or coercion, or in which the person induced to perform such act has not attained 18 years of age, for the purpose of exploiting the individual, adult or child, for profit through forced labour, prostitution or both. It constitutes a violation of human rights in which the victims are deprived of their fundamental freedoms. This Policy is consistent with Excis Code of Ethics and Standards of Conduct.

Scope

The Policy applies to all personnel employed by or engaged to provide services to Excis, including, but not limited to, employees, officers, temporary employees, contingent workers (including Partners and Freelancers), casual staff, and independent contractors (collectively herein referred to as “the employees”). Every Excis’ employee is responsible for reading, understanding and complying this Policy.

Policy

Excis has a policy prohibiting human trafficking and trafficking-related activities ore forced, bonded (including debt bondage) or indentured labour, commercial sex, involuntary prison labour, slavery, or trafficking of persons shall not be used or tolerated. This includes transporting, harbouring, recruiting, transferring or receiving persons for labour or services by means of threat, force, coercion, abduction or fraud for the purpose of involuntary servitude, peonage, debt bondage or slavery. Further, as required by law, and pursuant to the Policy, Excis, his employees, contractors, subcontractors, agents, vendors, suppliers, partners and others through whom conducts business whit Excis, shall not:

1. Engage in any form of trafficking in persons during the performance of the contract;
2. Procure commercial sex acts during the performance of the contract;
3. Use forced labour in the performance of any work related to the contract;
4. Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
5. Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key items and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided or arranged by Excis), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
6. Use recruiters or Partners that do not comply with local labour laws of the country in which the recruiting takes place;
7. Charge applicants/candidates/employees/ Partners recruitment fees;



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

Each employee, contractor, subcontractor, from Excis, is responsible for ensuring compliance with this Policy. Any violation of this Policy will result in immediate termination of the employment contract from the employee. Violation of applicable laws may also result in a criminal prosecution of responsible individuals.

Investigations and Audits

Excis may perform investigations and audits to verify that business is being conducted in compliance with this Policy. All Excis employees and third parties through whom Excis conducts business are required to fully and promptly cooperate with any auditors and investigators and must respond fully and truthfully to any inquiries and requests for documents. Any failure to fully cooperate or hinder an investigation or audit may be grounds for disciplinary action, up to a termination of the employment contract, subject to applicable law.

Reporting

Credible information regarding a potential violation of this Policy, whether by an employee, contractor, subcontractor, agent, vendor, supplier, partner, and others through whom Excis conducts business, must be immediately reported to the Human Resources Department, Mieke Uitterlinden, mieke@excis.com or the Legal Department Dolores Uitterlinden, dolores@excis.com. Employees who fail to report actual or suspected human trafficking (when there are reasonable grounds to believe it exists) may be deemed in violation of this Policy as permitted by applicable law.

Excis will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation related to this Policy, even when no evidence is found to substantiate the report.

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