



Policy Prohibiting Modern Slavery and Human Trafficking

Levin Sources is committed to delivering impact ethically, honestly and with transparency.

Levin Sources is committed to building an environment where our employees can feel respected and valued, and in turn can treat our customers, partners, donors and the communities and individuals we work with the same ethical standards. As part of our overall ethical goals, Levin Sources has adopted a zero-tolerance policy regarding modern slavery and human trafficking.

Applicability of the Trafficking in Persons Policy

This Policy applies to all Employees, Partners, Subrecipients, Subcontractors, and Vendors/Suppliers, working with us in the UK or overseas.

A violation of this Policy may result in the termination of any existing contract, without penalty, and Levin Sources will pursue any other remedial actions authorized by UK Law.

Definitions

- Employee – An individual engaged in the performance of a contract as a direct employee, consultant, or volunteer of the recipient or any sub-recipient.
- Modern slavery and human trafficking - Modern slavery is a complex crime that covers all forms of slavery, trafficking and exploitation. Trafficking includes transporting, recruiting or harbouring an individual with a view to them being exploited. Modern slavery crimes may involve, or take place alongside, a wide range of abuses and other criminal offences such as grievous bodily harm, assault, rape or child sexual abuse. Victims of modern slavery can be men, women and children of any age across the world. There is an assumption that victims of modern slavery are often trafficked to the UK from other countries, but residents of the UK are also among the victims that are exploited in the UK and other countries. The crime is often hidden from the authorities and the general public. Victims may struggle to leave their situation because of threats, punishment, violence, coercion and deception, and some may believe that they are not in a situation of exploitation.
- The Palermo Protocol (UNHCR)- the internationally recognised process for defining human trafficking, includes three aspects:
 - the action: recruitment, transportation, transfer, harbouring or receipt of persons.
 - the means: 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.
 - the purpose: the definition of exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude, or the removal of organs.
- Sex trafficking - the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.
- Commercial sex act - any sex act on account of which anything of value is given to or received by any person.
- Forced Labor - knowingly providing or obtaining the labor or services of a person by threats of serious harm to, or physical restraint against, that person or another person; by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or



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services, that person or another person would suffer serious harm or physical restraint; or by means of the abuse or threatened abuse of law or the legal process.

- Involuntary servitude - a condition of servitude induced by means of any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or the abuse or threatened abuse of the legal process.

Policy

Levin Sources has zero tolerance regarding modern slavery and human trafficking. Levin Sources' employees, associates, sub-awardees, or contractors (at any tier) or their employees, labor recruiters, brokers, or other agents, shall not engage in any of the following:

Prohibited Activities:

- Any action which is indicated under the Modern Slavery and Human Trafficking or Palermo Protocol definitions, as provided above.
- Procure commercial sex acts.
- Directly support or advance trafficking in persons, including:
 - Destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents.
 - Soliciting a person for the purposes of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment.
 - Charging employees recruitment fees.
 - Providing or arranging housing that fails to meet the host country housing and safety standards.

FOR USAID CONTRACTS / Annual Certification Required for Awards Exceeding \$500,000

For awards exceeding \$500,000, Levin Sources, as the recipient, must submit the Annual Certification Regarding Trafficking in Persons to the Agreement or Contracting Officer of Record, and must implement a compliance plan to prevent the activities described above. Levin Sources must provide a copy of the compliance plan to the Agreement or Contracting Officer of Record upon request and must post the useful and relevant contents of the plan or related materials on its website and at the workplace.

The compliance plan noted above must be appropriate to the size and complexity of the award and to the nature and scope of the activities to be performed. Levin Sources Prohibiting Trafficking in Persons Model Compliance Plan is a model that field offices may use to draft local compliance plans.

Reporting

All compliance plans shall have a reporting process for employees to report violations of the 'Policy Prohibiting Modern Slavery and Human Trafficking', without fear of retaliation. Violations of this policy may be reported anonymously via Levin Sources' anonymous compliance hotline: hello@levinsources.com.

Policy Compliance

If Levin Sources receives credible information from any source that alleges that an employee, recipient, contractor, sub-awardee, vendor/supplier or agent has engaged in any of the Prohibited Activities referenced above, Levin Sources must immediately report violations to the Modern Slavery Helpline on 08000 121 700 or the police on 101.

Failure to comply with this policy may result in:

- Removal of employee(s)



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- Termination of contract/award, subcontract/sub-award
- Suspension of payments
- Declining to exercise options under contract/award
- Loss of award fee
- Suspension or debarment

Subaward/Sub-Contracting Flow Down Requirements

Levin Sources must include in all subawards and subcontracts a provision prohibiting the conduct described above by the sub-awardee, subcontractor, or any of their employees.