

Anti-Human Trafficking Policy

I. Purpose

The Institute for Spirituality and Health at the Texas Medical Center (Institute) is an organization dedicated to enhancing well-being by exploring the relationship between spirituality and health. The Institute's values are opposed to the crime and human rights violation of trafficking in persons. Thus, the Institute is committed to prohibiting and preventing human trafficking and associated conduct amongst personnel and partners and to ensuring that these entities and the Institute's beneficiaries are not victims of the crime of trafficking. This policy seeks to be in compliance and alignment with the United States Government's anti-trafficking laws, regulations, and policies, as well as applicable international laws.

II. Scope

This Policy applies to all Institute staff and associated personnel (collectively referred to as an "Institute Person"). An "Institute Person" is defined as all:

- (a) permanent, fixed term, and temporary staff;
- (b) board members;
- (c) outside consultants, independent contractors, and subcontractors;
- (d) third-party representatives and agents; and
- (e) volunteers, community workers, interns and public service or legal fellows who conduct work on behalf of the Institute.

This Policy also applies to external parties, such as the Institute's partners, sub-recipients, suppliers, and vendors, working for or receiving funding from the Institute ("Institute Partner"). In short, this policy applies to any individual or entity having a direct or indirect contractual relationship with Institute and any individual or entity that is funded, in whole or in part, with Institute resources or that acts on the Institute's behalf at the Institute's direction.

This Policy forms a part of an employee's terms and conditions of employment and may be subject to change at the discretion of management. Adherence to this Policy is mandatory, and non-compliance could lead to termination of employment with the Institute, and/or other legal or disciplinary action at the Institute's discretion. Every Institute Person is responsible for reading, understanding, and complying with this policy.

Institute Partners must abide by this Policy and must take steps to prevent activity described in this Policy by staff and must also cooperate fully with any investigations of violations. The Institute may take appropriate steps to monitor and detect violations by

Partners, including reviewing plans for ensuring compliance with anti-trafficking regulations.

III. Policy

The Institute strictly prohibits and adopts a zero-tolerance policy regarding the following:

1. Engaging in human trafficking
2. Any offer to exchange, or actual exchange, of money, employment, goods or services for sex, sexual favors or other forms of humiliating, degrading or exploitative behavior, even when such transactions would be legal and/or consensual in the jurisdiction where they would occur
3. Using forced labor in the performance of any work for the Institute
4. Denying an employee access to identity documents
5. Using misleading or fraudulent recruitment practices
6. Using recruiters that do not comply with U.S. or Institute country office labor laws
7. Charging employees recruitment fees
8. Providing or arranging housing that fails to meet host country housing safety standards
9. Where the law requires it, failing to provide a written contract of employment or proof of employment
10. Failing to pay contractually agreed return transportation costs for certain employees who have finished employment outside that employee's nation of residence
11. Failing to pay wages that meet host-country legal requirements

IV. Definitions

1. Human trafficking: Human trafficking means recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, fraud, coercion, abduction, deception, the abuse of power or of a position of vulnerability, or 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. Exploitation includes involuntary servitude, peonage, debt bondage or slavery, the removal of organs, and sex trafficking or other forms of exploitation.
2. Commercial sex act: Any sex act on account of which anything of value is given to or received by any person
3. Forced labor: Situations in which persons are coerced to work through the use of violence or intimidation or by more subtle means, such as accumulated debt, retention of identity papers, or threats of denunciation to immigration authorities

V. Reporting

Institute Persons who have a reasonable belief that an act in violation of this Policy has been committed should report the matter to their supervisor. If their supervisor is not available, or if they are implicated in the complaint, the matter should be reported to any Officer of the Institute's Board of Trustees.

Where appropriate, both Institute Persons and Partners also have available the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

The Institute reserves the right to create additional standard operating procedures ("SOPs") for the reporting, remediation, and investigating of violations of this Policy.

VI. Enforcement

Institute Persons who violate this Policy may be subject to disciplinary action up to and including termination of employment. Institute Partners that violate this Policy may have their relationship with the Institute terminated.

Additionally, a violation of this Policy may be referred to local or federal authorities, such as the police or a federal law enforcement agency, if the conduct is also considered a criminal act.

The Institute prohibits retaliation against anyone who reports any violation of this policy or who cooperates with any investigation of such reports. The Institute also prohibits knowingly making a false report under this Policy. Institute Persons who engage in any retaliation or false reporting will be subject to disciplinary action up to and including termination of employment. Institute Partners that engage in any retaliation or false reporting will be subject to termination of the relationship.

VII. Questions

For any questions, comments, or concerns about this Policy, please contact the Institute's Vice President of Operations.