

# Human Trafficking Policy (2017-SKA-HR-007)

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Document Control

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Author: Authorized By:	Senior VP/Director HR & Admin CEO
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## 1. Scope

1.1 SKA strictly prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities.

1.2 These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

1.3 Any queries arising from this policy or its implementation can be taken up directly with the HR Department at [hrrservices@ska-arabia.com](mailto:hrrservices@ska-arabia.com).

1.3 SKA is the owner of this document and has approved management responsibility for its development, review and evaluation.

1.3.1 This policy is intended to be read by all employees and contractors for general information and awareness.

## 2. Policy Guideline

2.1 SKA also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including:

- a) Destroying or otherwise denying access to an employee's identity or immigration documents;
- b) Using misleading or fraudulent practices to recruit employees such as failing to disclose key terms and conditions of employment;
- c) Using recruiters that do not comply with local labor laws;
- d) Charging employees with recruitment fees;
- e) Failing to provide return transportation to certain employees who are brought to a country for the purpose of working.
- f) Providing housing that fails to meet host country standards; and
- g) Failing to provide an employment contract or work document where required by law.

SKA will take appropriate disciplinary action for violations of these rules, up to and including discharge of employees, subcontractors, and agents.

Employees of SKA are required to cooperate in any internal or external investigation of suspected wrongdoing under this policy.

### **3. Mandatory Reporting Requirements**

3.1 Employees having knowledge of credible information concerning actual or potential violations of this policy must report them immediately. Timeliness of reporting any suspected violation is critical. Failure to report actual or potential illegal behavior or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment.

3.2 SKA has many channels available to receive reports of possible violations of policy.

3.3 Employees may also report possible violations to line management, human resources, compliance professionals throughout the organization.

3.4 Any person who receives reports of possible violations under this policy must notify the HR Manager. When making a report, employees are encouraged to share as much information as possible so that appropriate action can be taken.

3.5 In addition to the reporting requirements described above, it is possible for our employees to report activity inconsistent with this policy to the Senior VP / Director HR & Admin.

### **4. Non-Retaliation Policy**

4.1 SKA do not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or audit investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, which could include termination of employment.