



Anti-Slavery and Human Trafficking Policy

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1. Introduction

Africa Talent Contours limited is a management and human resource consulting firm. We are registered in Nairobi Kenya and work with partners across the African continent. Our objective is to work with clients in Kenya, Africa and globally at large. Our services include recruitment, payroll support, labor outsourcing, training and development, compensation advisory, job evaluation, performance managed training, business research and surveys.

Our business is based on following the rule of law and observing always agreed ethical norms. Hence, we have a responsibility both as a business and as individuals to tackle any form of Modern Slavery. We will not tolerate, facilitate, or condone any form of Modern Slavery across our business or throughout our supply chains. This is supported through the communication to, and compliance of, our employees, suppliers and third-party providers with the company Anti-Slavery and Human Trafficking Policy

2. Purpose and Scope

The purpose of this policy is to communicate and establish controls to ensure compliance with all Anti-slavery and Human trafficking regulations as well as ensuring alignment to the organization's ethical standards and Code of Conduct. The policy covers all company employees, suppliers and third-party providers and is intended to ensure all are aware of the responsibilities they hold.

3. Definition Modern Slavery?

Modern Slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced compulsory labor, bonded and child labor and human trafficking, all of which include the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Human trafficking is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation. It's important to note, though, that human trafficking can include, but does not require, movement. You can be a victim of human trafficking in your hometown. At the heart of human trafficking is the traffickers' goal of exploitation and enslavement

The latest International Labor Organization estimates show there are 152 million children in child labor and 25 million children and adults in forced labor globally. As a business involved in the supply of labor, we must ensure we address the eradication of Modern Slavery throughout and in always in all our business activities. We must also consider our third parties and service providers who support the service offered we give to our customers.

There is no typical victim of Modern Slavery, and some victims do not understand that they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of Modern Slavery or human trafficking:

- The person is not in possession of their own passport, identification, or travel documents.
- Legal documents, money, personal possessions held by another person.
- The person is acting as though they are being instructed or coached by someone else.
- Dependent on controller/employer for necessities, food, housing, etc
- Living and/or working in unsafe and unsanitary conditions
- The person allows others to speak for them when spoken to directly.
- Restricted, mediated, or controlled communications.
- The person is dropped off and collected from work.



- No permitted work breaks or days off and working long hours
- Unpaid, paid very little, or only earn money through tips.
- The person avoids eye contact, is withdrawn or appears frightened.
- No knowledge of their work contract and their basic human rights.
- Required to meet a daily or nightly quota through sex acts.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside of their immediate environment.
- Trafficking in persons typically involves the use of force, fraud, or coercion to compel a person to provide Labor or Services (Labor Trafficking) and Commercial Sex (Sex Trafficking).
- Severe Forms of Human Trafficking involves the recruitment, Harboring, Transportation, Provision, Patronizing, Soliciting or Obtaining a person using force, fraud, or coercion for the purpose of forced Labor or Services. These include:
 - a) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which a person induced to perform such act has not attained 18 years of age; or
 - b) The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, using force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

The above list is not exhaustive. A person may display several of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

4. Our Policy

Our policy does not allow for any form of slavery or human trafficking, and we will take proactive steps to ensure that Modern Slavery is not taking place in any part of our business.

We will not engage with organizations which facilitate any form of slavery including the use of child labor or forced labor, or which do not recognize freedom of association or collective bargaining.

We require that the suppliers and third parties we work with should hold their own suppliers and third parties to the same standards.

We seek to continually improve awareness of the practices necessary to combat slavery and human trafficking and assess the risk profile of our business in these areas.

Our zero-tolerance approach to Modern Slavery includes our commitment that:

- We will not allow any form of slavery or human trafficking to take place in any part of our business.
- We will not use child labor, nor will we use forced labor.
- Confiscating an employee's identity or immigration documents is prohibited.
- We recognize freedom of association by permitting our employees to establish and join organizations of their own choosing without our permission.
- We will recognize collective bargaining where required by local laws.
- We will comply with all relevant laws, statutes and regulations relating to modern slavery.
- Offering employment using fraudulent or misleading pretenses is prohibited.
- Charging placement or recruitment fees is prohibited.
- Providing housing that fails to meet the host country housing and safety standards is prohibited.



- We will publish Modern Slavery Statements in accordance with the relevant legislation.
- We require our suppliers and third-party providers to comply with the above; and to hold their own suppliers and third parties to the same standards.
- We will seek to educate and raise awareness across our business in the identification and reporting of Modern Slavery.

5. Compliance

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working within it.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, business partners and suppliers. We expect the highest standards of compliance to be always upheld.

We shall have a robust governance structure in place and take a risk-based approach to our contracting processes, which are then kept under review.

We request individual company assessments and declarations where appropriate to do so and have introduced standard wording into our contracts that requires a supplier to represent, warrant and undertake that neither it nor any other person in its supply chain uses trafficked, bonded, child or forced labor or has attempted to use trafficked, bonded, child or forced labor within its supply chain. We retain the right to audit our supplier's activities and where practical, relationships, both routinely and at times of any reasonable suspicion.

If we find that other individuals or organizations working on our behalf have breached this policy, we will ensure that we take appropriate action. Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. If a supplier or third-party provider is found to be in breach of this policy, we may terminate our relationship and any contract or purchasing agreement in place.

6. Reporting Modern Slavery

Employees, suppliers, and third-party providers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.

If you are an employee, you must report any incidence or suspicion of Modern Slavery and/or human trafficking in any part of our business or supply chain to the General Manager.

As well as employees, suppliers and other business partners can confidentially report any serious concerns by email to: support@talcl.com. Reports are received confidentially and acted upon as appropriately.