



Reall Group Anti-Slavery and Human Trafficking Policy

POLICY CHANGE RECORD	
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Policy Statement

At Reall Group (referred to as Reall), we believe that everyone has the right to live their lives free from exploitation and realise all human rights. Reall does not tolerate anyone associated with the delivery of its work carrying out any form of modern slavery or human trafficking. This includes employees, partners, volunteers, suppliers, consultants, contractors, or any other representatives.

We recognise that a zero-tolerance approach with partners, suppliers and contractors could undermine our ability to engage in the best interests of the survivor and to address the root causes of the issue. Therefore, with partners, suppliers, and contractors we take an approach of **zero tolerance to inaction** on modern slavery, or human trafficking. Reall will terminate a contract where the conduct of partners, suppliers or contractors demonstrably violates this policy, and there is no willingness to address any specific instances which arise or address underlying weaknesses in systems which led to the incident, within a reasonable time period. This is in line with Ethical Trading Initiative guidance¹.

The Reall Executive hold overall accountability for this policy and it is the responsibility of all Reall Staff and Board members to ensure the delivery of this policy. Any allegation of modern slavery or human trafficking will be dealt with in a robust and timely manner, being sensitive to the wishes of those affected. Reall will take appropriate steps to assess the risk of partners and suppliers not meeting the policy, based on an assessment of the most salient risks and Reall's ability and leverage to address them.

This policy applies in all countries and regions where Reall operates.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of management.

Purpose of this Policy

The nature of the work we do and the countries we source from and work in, mean that despite our best efforts, there is a risk that various forms of modern slavery could exist. This Anti-Slavery and Human Trafficking Policy is our overarching policy to set out Reall's approach to preventing modern slavery and human trafficking in our operations, our partners' operations, and supply chains. It includes:

- Our commitments to assess the risk and take preventative steps.
- The principles upon which we will base our decision making and actions.
- Our expectations of all who represent Reall.
- Our commitments to ensure effective action is taken when problems occur.

All staff will be aware of this policy.

Associated policies relevant to anti-slavery and human trafficking are below, and should be read and following in conjunction with this policy:

- Safeguarding Policy
- Fraud and Corruption Policy
- Anti-Terrorist Financing and Money Laundering Policy
- Anti-Bribery Policy
- Staff Handbook
- Whistleblowing Policy

¹(https://ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_guidance_modern_slavery_web.pdf, p41)

Context and Definitions

Slavery did not end with abolition in the 19th century. Instead, it changed its forms and continues to harm people in every country in the world. 40 million people are currently estimated to be trapped in modern slavery worldwide, and over three quarters of victims are women and girls.²

Whether they are men forced to work in construction, whole families forced to work as bonded labourers in brick kilns and agriculture, women forced into prostitution, children in manufacturing factories or girls forced to marry older men, their lives are controlled by their exploiters, they no longer have a free choice and they have to do as they're told. They are in slavery.

Today slavery is less about people literally owning other people – although that still exists – but more about being exploited and completely controlled by someone else, without being able to leave.

Modern slavery and human trafficking is often hidden in plain sight.

Someone is in slavery if they are:

- forced to work – through coercion, or mental or physical threat.
- trapped and controlled by an 'employer', through mental or physical abuse or the threat of abuse.
- dehumanised, treated as a commodity or bought and sold as 'property'.
- physically constrained or have restrictions placed on their freedom of movement.

According to the International Labour Organisation, construction is the second-highest risk sector (after domestic work) for forced labour, with an estimated 4.5 million construction workers in forced labour around the world.³ Materials used in construction such as stone, bricks and cement may be produced with forced labour.⁴

Forms of modern slavery:5

- **Forced labour**– all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.
- **Debt bondage or bonded labour** – the world's most widespread form of slavery, where debt is used as a mechanism of control over a person and then to force people to work to pay off that debt. People borrow money they cannot repay, are forced to work off the debt and lose control over the conditions of both their employment and the debt.
- **Human trafficking** – involves transporting, recruiting, or harbouring people for the purpose of exploitation, using violence, threats or coercion to achieve control over the person.
- **Descent-based slavery** – where people are born into slavery because their ancestors were captured and enslaved; they remain in slavery by descent.
- **Domestic servitude** – the circumstances and conditions of domestic work amount to slavery, when, for example, employers stop domestic workers from leaving the house, withhold wages or identity documents, use violence or threats, limit their contact with family and force them to work.

² https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_574717/lang-en/index.htm

³ https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms_575479.pdf

⁴ <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

⁵ Information taken from Anti-Slavery International see <https://www.antislavery.org/slavery-today/modern-slavery/> for more details

- **Child slavery** – is the enforced exploitation of a child for someone else’s gain, meaning the child will have no way to leave the situation or person exploiting them. It can include child trafficking, child soldiers, child marriage, and child domestic slavery. It is not to be confused with child labour, see below.
- **Forced and early marriage** – when someone is married against their will and cannot leave the marriage. Most child marriages can be considered slavery.
- **Child trafficking** - child trafficking is the recruitment, transportation, transfer, harbouring or receipt of any person under the age of 18 years of age, for the purpose of exploitation. Children are defined as trafficked even if there has been no violence, deception, or coercion.

Consent

It is irrelevant whether a person gives their consent. For example, a worker may not give their **voluntary consent** if they:

- Felt they have no other options to earn a living.
- Feel under any menace of penalty.
- Consent to terms and conditions that turn out to be untrue.
- Are suffering from trauma.

Standards

Reall does not tolerate anyone associated with the delivery of its work carrying out any form of modern slavery. Reall and its partners, suppliers and contractors are expected, as a minimum, to comply with all applicable international human rights standards, national legislation, statutory requirements, and existing policies.

Reall respects the labour rights of workers and asks its partners, suppliers, and contractors to accept responsibility for the standards in their supply chains and to take active steps to enable workers to realise their labour rights according to the Ethical Trading Initiative Base Code⁶. Reall’s partners, suppliers and contractors are expected to meet the corporate responsibility to respect human rights in line with the UN Guiding Principles on Business and Human Rights. Where national legislation conflicts with international human rights and environmental standards, Reall’s partners, suppliers and contractors are expected to seek ways to honour the principles of international standards.

Complementary, and in alignment with the above, all staff, partners, and suppliers are expected to demonstrate commitment to meet the following standards:

Zero tolerance to inaction on exploitation, including all forms of modern slavery and human trafficking, through robust prevention and response work, offering support to workers and holding those responsible to account.

Freedom

- Coercion or force shall not be used to physically confine or imprison workers to the workplace, accommodation, or related premises.
- Workers shall have the freedom to leave their employment within the terms of their contract and may not be prevented from doing so.
- Workers have the right to enter into employment voluntarily and freely, without the threat of a penalty.

⁶ https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Base%20Code%20%28English%29.pdf

- Workers shall not be held in debt bondage or forced to work for an employer to pay off an incurred or inherited debt.
- No worker has their identity or immigration documents destroyed, concealed, confiscated, or otherwise denied to them. If these are held for safe keeping, it must be done voluntarily with the worker being able to reclaim such documents on request.

Fair Payment and working hours

- All workers, regardless of contract-type, receive written contracts in a language they understand.
- No worker should pay for access to employment - all recruitment fees and related costs⁷ should be borne, not by the worker, but by the employer ('employer pays' principle⁸). The cost of clothing, protective equipment and training required to perform work safely should be borne by the employer.
- Wages should be paid directly to the worker, where Reall is not the direct employer, appropriate checks should be in place to ensure the worker receives the correct wage.
- Wages must comply with agreed contracts, be paid in full and on time, and at a level that meets or exceeds the applicable minimum wage. Clear written details, in a language understood by the worker, must be provided to all workers detailing how payment has been calculated.
- No compulsory deductions from wages shall be made that aren't mandated by law and the worker should still have enough to live on after all deductions have been made. Where possible workers should freely give their consent for all deductions.
- Wages should be paid at least monthly.
- Working hours meet national standards or collective agreements and all overtime must be voluntary. Workers are able to refuse overtime without any form of penalty.
- Workers must be provided with all benefits they are entitled to under national or local law for e.g. paid leave, bonus, sick pay and/or social security payment contributions and provided to the Worker in a written and understandable form.

Working and Living Conditions

- Working conditions and accommodation are safe, clean, and protect workers' welfare and needs. In line with the host country housing and safety standards, or the ETI base code, whichever is higher.
- All workers should have the option to choose not to live in accommodation provided by the employer.

Culture and Transparency

- There is no discrimination in any form, based on race, colour, language, nationality, ethnic or social origin, religious belief, political opinion, gender, marital status, disability, property, birth, age, sexual orientation, or Trade Union membership.

⁷ Recruitment fees and related costs are defined according to the 2019 International Labour Organisation definition. See Appendix 2.

⁸ <https://www.ihrb.org/dhaka-principles>

- No worker is solicited for the purpose of employment, on the basis of deception, coercion, or abuse of their position of vulnerability. No worker is to be offered employment, by means of materially false or fraudulent pretences, or representations or promises regarding that employment.
- There are multiple channels through which staff and other stakeholders can raise concerns which are accessible to all men, women, and other gender identities. Appropriate steps are taken to raise awareness about these channels among stakeholders.
- Workers are free to associate or to join Trade Unions or other organisations that represent them.
- All concerns or allegations of modern slavery or trafficking are responded to in a timely and appropriate manner.

Migrant and contract workers

For all principles above, special care is made by Reall and its partners, suppliers and contractors to make sure that migrant and contract workers are employed responsibly, that they are not indebted to agencies or their employer, that they receive adequate training, and that their welfare and rights are safeguarded.

Child labour and Child Slavery

- Reall and its partners, suppliers and contractors are expected to ensure compliance with the International Labour Organisation's Conventions 138 and 182 relating to Child Labour to prevent the use of child labour, the worst forms of child labour and child slavery. Reall and its partners, suppliers, and contractors should refer to the Reall Safeguarding Policy for procedure.
- No young worker who is legally entitled to work, i.e. above the minimum age of employment of 15⁹ and below the age of 18 years' old, will be employed via labour agents or other labour provider intermediaries.

Principles to guide our anti-slavery and human trafficking policy

- Survivor focused: we are committed to listening to all people, women, men and other gender identities, working in our own operations, implementing partnerships and in our supply chain and being led by the wishes and best interests of survivors where possible and appropriate.
- Non-directive: we aim to empower survivors and complainants by helping them explore their options in safe ways without imposing our own opinions.
- Non-judgemental: we never judge survivors or complainants for their actions or decisions. We aim to empower survivors and complainants by helping them explore their options in safe ways.
- Confidentiality: We are committed to ensuring confidentiality, but some information will need to be shared with specialist teams outside the organisation to ensure safety and to prevent modern slavery.

⁹ The ILO defines "child worker" as someone who has not reached their 15th birthday, or any higher age specified in local law for completing mandatory schooling or beginning full time work. However, in strictly limited circumstances, where local law sets the minimum age at 14 years, under ILO convention 138 in accordance with developing country exceptions, the lower can apply.

- Independent investigations: through independent investigating consultants and working with local NGOs, trade unions, community organisations or authorities, we will carry out independent and discreet investigations, recognising the rights and duty of care to everyone involved, including the complainant or survivor, witnesses and the person accused.
- Commitment to good practice: we always strive to offer the best service possible and are open to feedback and continual learning.
- Conscious of gendered implications: There are a number of ways that anyone can become enslaved and also different routes out of slavery, but there are notable particularities of experience that differ between women and girls compared with men and boys, therefore we are conscious of the gendered implications of effective identification, response and mitigation of modern slavery for women and for men.
- A culture where women and men feel empowered and respected and able to raise concerns related to this policy.
- Open to learning and improving in order to drive wider change to tackle modern slavery and human trafficking in global supply chains.

Reall will ensure that:

- All staff, partners, volunteers or any other representatives will have access to information about how to identify risks, report concerns or allegations of modern slavery and human trafficking.
- All staff, volunteers and other representatives will have access to, and be aware of this policy and know the parameters of their responsibilities within it.
- All Directors are responsible for promoting awareness of this policy within their departments or teams and with suppliers and partners.
- All Partners have a modern slavery policy before any investment can be made (Basic Criteria from the Investment Policy)
- Concerns or allegations about modern slavery and human trafficking will always be taken seriously, and where appropriate acted on.

This policy will be used in conjunction with employment/labour, duty of care and relevant criminal laws to make decisions about how to respond to complaints and concerns raised by staff, volunteers and other representatives and suppliers.

Roles and Responsibilities

Reall Executive hold overall accountability for this policy and all Reall staff are responsible for its implementation.

The Asia & Africa Partnerships Director is responsible for reviewing and updating this policy every two years, and in line with good practice, legislative and organisational developments.

All staff, partners, volunteers, or any other representatives, are required to adhere to this policy at all times.

All Reall staff are obliged to report any suspicions of modern slavery. Where information has been shared in confidence, cases can be reported without disclosing personal information. This can be done without sharing details of cases.–Failure to report, to a relevant person, suspicion of modern slavery relating to someone else is a breach of policy and could lead to disciplinary action being taken. For the avoidance of doubt, there is no obligation placed on any survivors to report any incident that has happened to them.

Remediation

The wishes and best interests of survivors are the primary concern for interventions in modern slavery cases. Immediate termination of a supplier or partner or removing a worker from the situation may reduce the likelihood of an appropriate resolution for the survivor and could cause more harm. Therefore, our approach will be to look for solutions that mitigate the survivors' current situation, and prevent the risk of further harm, by:

- Seeking advice from experts and engaging specialist organisations, including local organisations such as migrant organisations or local NGOs, and/or authorities (where appropriate and safe).
- Where appropriate and safe, involving the police, where there are suspicions of serious and organised criminal involvement.
- Looking beyond the individual case to identify contributing factors and poor practice.
- Ensuring the supplier /partner takes significant action to prevent any further cases.

Where the survivor is employed/ recruited through a supplier/ implementing partner, it will be the responsibility of the supplier/ partner to provide remedy, with support from Reall to meet the above principles.

Reall commits to supporting and working with suppliers, and partners who have genuine difficulties in meeting these guidelines but demonstrate commitment to ensuring the best outcome for the survivors and show timebound progress.

How to raise a Complaint or Concern

Anyone can raise a concern or make a complaint to Reall about something they have experienced or witnessed. You can do this verbally or in writing to your Line Manager, Corporate Services or via Reall's Whistleblowing Service. Please refer to Reall's Whistle Blowing and Grievance Policies.

You can email any concerns confidentially on concern@reall.net.

Appendix 1 - ILO Definition of recruitment fees and related costs

According to the ILO 2019¹⁰, “the terms ‘recruitment fees’ or ‘related costs’ refer to any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.”

Recruitment fees:

- payments for recruitment services offered by labour recruiters, whether public or private, in matching offers of and applications for employment
- payments made in the case of recruitment of workers with a view to employing them to perform work for a third party
- payments made in the case of direct recruitment by the employer; or d. payments required to recover recruitment fees from workers

These fees may be one-time or recurring and cover recruiting, referral and placement services which could include advertising, disseminating information, arranging interviews, submitting documents for government clearances, confirming credentials, organizing travel and transportation, and placement into employment.

Related Costs

Related costs are expenses integral to recruitment and placement within or across national borders, taking into account that the widest set of related costs are incurred for international recruitment. These costs are listed below and may apply to both national and international recruitment. Depending on the recruitment process and the context, these cost categories could be further developed at the national level.

When initiated by an employer, labour recruiter or an agent acting on behalf of those parties; required to secure access to employment or placement; or imposed during the recruitment process, the following costs should be considered related to the recruitment process:

- Medical costs: payments for medical examinations, tests or vaccinations
- Insurance costs: costs to insure the lives, health and safety of workers, including enrolment in migrant welfare funds
- Costs for skills and qualification tests: costs to verify workers’ language proficiency and level of skills and qualifications, as well as for location-specific credentialing, certification or licensing
- Costs for training and orientation: expenses for required trainings, including on-site job orientation and pre-departure or post-arrival orientation of newly recruited workers
- Equipment costs: costs for tools, uniforms, safety gear, and other equipment needed to perform assigned work safely and effectively
- Travel and lodging costs: expenses incurred for travel, lodging and subsistence within or across national borders in the recruitment process, including for training, interviews, consular appointments, relocation, and return or repatriation
- Administrative costs: application and service fees that are required for the sole purpose of fulfilling the recruitment process. These could include fees for representation and services aimed at preparing, obtaining or legalizing workers’ employment contracts, identity documents, passports, visas, background checks, security and exit clearances, banking services, and work and residence permits.

¹⁰ https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---migrant/documents/publication/wcms_536755.pdf

Enumeration of related costs in this definition is generalized and not exhaustive. Other related costs required as a condition of recruitment could also be prohibited. These costs should be regulated in ways to respect the principle of equality of treatment for both national and migrant workers.

Illegitimate, unreasonable, and undisclosed costs

Extra-contractual, undisclosed, inflated, or illicit costs are never legitimate. Anti-bribery and anti-corruption regulation should be complied with at all times and at any stage of the recruitment process. Examples of such illegitimate costs include: bribes, tributes, extortion or kickback payments, bonds, illicit cost-recovery fees, and collaterals required by any actor in the recruitment chain.