

Anti-Human Trafficking and Anti-Modern Slavery Policy

1. Purpose and Commitment

CSA is committed to a work environment free from human trafficking, modern slavery, and exploitation in all forms. These practices are fundamentally opposed to our mission, values, and ethical standards. CSA will not tolerate them in any part of our operations or supply chains.

We expect everyone connected with CSA—employees, contractors, suppliers, and partners—to uphold this commitment and actively prevent, avoid, and report any such practices.

2. Scope

This policy applies to:

- All CSA staff, consultants, volunteers, board members, and trustees
- All third parties providing goods, services, or labor to CSA
- All parts of our supply chains, worldwide

3. Policy Principles

CSA strictly prohibits:

- Any involvement in human trafficking, forced labor, or modern slavery
- Working with suppliers, partners, or individuals who engage in such practices
- Practices that exploit or abuse vulnerable individuals for commercial gain

We comply fully with applicable laws and support international standards, including conventions against trafficking and slavery.

4. Key Definitions

Human Trafficking: The recruitment, transport, or harboring of people through coercion, fraud, or deception for the purpose of exploitation.

Modern Slavery: The illegal exploitation of people through forced labor, debt bondage, or servitude. Victims are often trapped with no realistic means of escape.

Exploitation: Includes forced labor, sexual exploitation, domestic servitude, forced marriage, organ removal, and other abuses that deprive individuals of their freedom.

5. Examples of Prohibited Practices

The following are clear violations of this policy:

- Forced labor or services
- Withholding workers' legal documents to restrict their freedom
- Charging fees to workers for recruitment
- Misleading employment terms or coercive contracts
- Using suppliers or recruiters who do not meet legal labor standards

6. CSA Commitments

CSA will:

- Maintain a zero-tolerance approach to human trafficking and modern slavery
- Require transparency, ethical standards, and due diligence throughout our supply chains
- Assess risks and ensure appropriate safeguards in our contracts and partnerships
- Engage and collaborate with stakeholders to continuously improve protections
- Report any known or suspected violations to authorities as required by law

We expect all suppliers and contractors to meet these standards and require their subcontractors to do the same.

7. Compliance & Reporting

Obligations for All Personnel:

- Report any concerns or suspicions of trafficking or exploitation immediately to a unit director or through CSA's Whistleblower channels.
- Cooperate fully with investigations.

Obligations for Suppliers & Partners:

- Maintain their own clear reporting procedures or adopt CSA's.
- Notify CSA immediately of any suspected violations.

Violations may result in disciplinary action, termination of contracts, and legal reporting.

8. Monitoring & Enforcement

CSA may:

- Conduct audits or assessments of high-risk suppliers
- Require evidence of anti-trafficking and anti-slavery measures in place
- Terminate relationships with individuals or organizations that breach this policy