

PEAS Anti Modern Slavery and Trafficking Policy

Policy Overview

Promoting Equality in African Schools (PEAS) is committed to ensuring that modern slavery and human trafficking have no place in our operations, supply chains, or partnerships.

As an organisation dedicated to advancing quality education in Africa, we recognise our responsibility to uphold the highest ethical standards, safeguard human rights, and ensure our activities contribute positively to communities.

This policy applies to all PEAS employees, trustees, contractors, subrecipients, suppliers, and other third parties involved in our work.

Purpose of the Policy

The purpose of this policy is to:

- Demonstrate PEAS's zero-tolerance approach to human trafficking and modern slavery.
- Outline clear procedures to prevent, identify, and address trafficking-related activities.
- Ensure compliance with international laws and standards, including the UK Modern Slavery Act 2015, relevant U.S. Government requirements, and relevant Government requirements in the countries in which we operate.

Prohibited Activities

PEAS explicitly prohibits all individuals or entities acting on its behalf from engaging in the following activities:

- Participating in any form of human trafficking in persons.
- Engaging in forced labour.
- Engaging in acts that could be deemed to be contributing to sexual tourism, which includes commercial sex acts at any time during work travel.
- Using fraudulent recruitment practices, including misrepresentation of working conditions.
- Charging recruitment fees to employees or potential candidates.
- Providing housing that fails to meet applicable host-country safety and housing standards.
- Retaliating against employees or other individuals who report suspected violations.
- Denying access to an employee's immigration documentation.
- Failing to provide proof of employment or other necessary documentation in writing prior to the commencement of employment.

Implementation

PEAS will implement this policy through:

- Employee acknowledgment of receipt of this policy and annual agreement of understanding and adherence to the policy.
- Training provided to staff on the content of this policy and adherence to the policy.
- Reporting of any incidents through defined channels.

Employees will also be directed to resources, such as the [U.S. Department of State's Office to Monitor and Combat Trafficking in Persons](#) , and the [UK's National Crime Agency](#) to enhance their understanding of trafficking issues. Country offices may translate the policy into local languages as required, and additional resources may be used to ensure sensitivity to the local context.

All employees are responsible for complying with this policy as well as completing any associated training associated with this policy as a condition of continued employment.

Reporting and Accountability

PEAS encourages all individuals to report, without fear of retaliation, any suspicions or evidence of activities inconsistent with this policy.

- Reports may be made to any member of the Global Strategy Team, Country Strategy Team, Internal Audit Team, People & Culture team or your Line Manager.
- Reports may also be made to the reporting@peas.org.uk email address.
- All reports will be treated seriously and investigated thoroughly.

Retaliation against individuals who make good-faith reports is strictly prohibited, and disciplinary action will be taken against anyone engaging in such behaviour.

Enforcement

Strict adherence to this policy is required and any violations will result in disciplinary action that may include but is not limited to termination of employment for employees, and termination of the relationship with PEAS non-employees.

Anti-Human Trafficking Compliance Plan

Applies to - The purpose of this Plan is to ensure employees, partners and sub-contractors are aware of the legal requirements to conduct under anti-trafficking regulations and laws, as well as actions that may result from violations.

Appropriateness - This Compliance Plan may be adjusted as appropriate in line with the size and complexity of the contract and to the nature and scope of the activities to be

performed under its funding, including the risk that the contract or sub-contract will involve services or supplies susceptible to trafficking in persons.

Plan Requirements:

A) Awareness Program

PEAS has adopted an internal policy to ensure we are combatting human trafficking, to comply with the anti-human trafficking laws and regulations of both the United Kingdom and the United States of America, and those territories in which the Company operates. PEAS' policies describe prohibited trafficking related activities and the actions that will be taken against employees for violations.

In addition to this, PEAS includes an overview of combatting trafficking in persons in its procurement procedures and provides training to all employees with supplier delegation of authority, provides employees with general information, reporting requirements and examples of trafficking in the supply chain.

B) Process to Report

Any PEAS employee, consultant or third-party persons carrying out work on behalf of PEAS are required to report information or knowledge of the actual or potential human trafficking violations to any member of the Global Strategy Team, Country Strategy Team, Internal Audit Team, People & Culture team or Line Manager. Reports may also be made to the reporting@peas.org.uk email address.

The employee may also report violations privately by contacting the Modern Slavery Helpline (UK) confidentially on 08000 121 700, the Global Human Trafficking Hotline (USA) at 1-844- 888-FREE or help@befree.org.

Retaliation against an individual who reports a violation is strictly prohibited.

C) Recruitment and Wage Standards

PEAS commits to ethical recruitment and employment practices, including:

- Working only with recruitment agencies that employ trained personnel and adhere to ethical recruitment standards.
- Prohibiting the charging of recruitment fees to employees or potential hires.
- Ensuring wages meet host-country legal requirements, with any variances clearly justified and documented.
- For all purposes, all employees will be legitimately employed.

D) Housing

If PEAS or its contractors, sub-recipients, or partners provide or arrange housing, all facilities must meet applicable host-country housing and safety standards. Inspections may be conducted to ensure compliance.

E) Procedures for partners

PEAS expects all agents, sub-recipients, contractors, sub-contractors, and suppliers to share its commitment to preventing human trafficking and modern slavery. To this end:

- Due diligence checks will be conducted to assess risks in our supply chains and partnerships.
- Contracts will include provisions prohibiting trafficking-related activities.
- Any partner found engaging in or failing to address trafficking or modern slavery will have their contract terminated immediately.

F) Certification

- PEAS has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any partner, subcontractor or consultant engaging in prohibited activities, and:
- After having conducted due diligence, to the best of PEAS' knowledge and belief, neither it nor any of its partners, sub-contractors or their partners, are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, PEAS has taken the appropriate actions.

Monitoring and Compliance

PEAS will:

- Conduct periodic reviews of internal practices and supply chains to identify and address risks related to modern slavery and human trafficking.
- Require all employees and relevant third parties to sign a declaration acknowledging their compliance with this policy.
- Provide periodical training to staff to ensure ongoing awareness and compliance.

Policy Review

This policy will be reviewed annually and updated as needed to reflect changes in laws, organisational practices, and external environments.