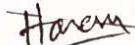


“Disability Inquisition Activities (DIA)” GB Anti-Slavery and Human Trafficking Policy.

Approval Date:	01 July 2023
Effective From:	01 July 2023
Author:	Corporate Responsibility Adviser
Policy Owner:	Head of Ethics
SLT Sponsor:	Chief Operating Officer
Approved By:	Safeguarding and Ethics Committee
Union consulted:	N/A
Date for Renewal:	September 2024
Geographical Scope:	Worldwide, except in countries where the following policy contravenes local legislation. In these cases, local legislation must be followed.
Implementation owner:	All managers, staff, non-staff and suppliers.
Implementation plan:	<u>This is the implementation plan</u>
Circulation:	Public


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POLICY STATEMENT

At “Disability Inquisition Activities (DIA)” we believe that everyone has the right to live their lives free from exploitation Disability Inquisition Activities (DIA)” **will not tolerate** anyone associated with the delivery of its work carrying out any form of modern slavery or human trafficking. This includes employees, volunteers, consultants, or any other representatives.

We recognize that a zero-tolerance approach with staff, suppliers and partners could undermine our ability to engage in the best interests of the survivor and to address the root causes of the issue. Therefore, we take an approach of **zero tolerance to inaction** on modern slavery and human trafficking. This means we require any concerns to be reported, so that staff with the necessary expertise can respond in a robust and timely manner. We believe this increases our chances of getting this complex and often hidden type of abuse identified, responding to survivors in a manner that is informed by their safety, holding any perpetrators to account and taking the right steps to mitigate any further harm. Where appropriate, Disability Inquisition Activities (DIA)” may refer incidents to the necessary authorities. We will terminate a contract where conduct demonstrably violates this policy, and there is no willingness to address specific behavior, instances and/or underlying weaknesses in systems which led to the incident, to meet the standards outlined by this policy within a reasonable time period. This approach is in line with Ethical Trading Initiative guidance.

SCOPE AND ELIGIBILITY

This policy applies where “Disability Inquisition Activities (DIA)” operates (both as an executing and partner affiliate). This includes all “Disability Inquisition Activities (DIA)”


GB staff, volunteers and representatives.

“Disability Inquisition Activities (DIA)” expects implementing partners and suppliers to work to this policy and will take appropriate steps to assess the risk of partners and suppliers not meeting the policy.

Proactive assessments of salient risks will be undertaken and actions will be integrated into our governance and decision-making across the organization, based on “Disability Inquisition Activities (DIA)”’s capacity and leverage to address those salient risks.

POLICY PURPOSE

There is a common perception that slavery is a thing of the past, but in 2016, it was estimated that


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40.3 million people were being held in modern slavery^{es} across all countries and all sectors of work.

Women and girls are disproportionately affected, comprising almost three quarters (71 per cent) of all those living in slavery today. The higher prevalence of poverty amongst women makes them relatively more vulnerable to becoming enslaved.

Modern slavery and human trafficking is complex and often hidden in plain sight. In many cases, perpetrators take extreme steps to hide this illegal practice and survivors fear the implications of reporting their abuser.


“Disability Inquisition Activities (DIA)” is a complex organization, with operations and supply chains which span multiple countries. The nature of the work we do and the countries we source from and operate in, mean that despite our best efforts, there is a risk that various forms of modern slavery could exist. This policy sets out DIA GB’s approach to identifying, preventing and responding to modern slavery and human trafficking in our operations, implementing partners and supply chain. It includes:

- Our commitment to assess the salient risks, provide remedy for survivors, to take preventative steps
- The principles upon which we will base our decision-making and actions
- Our expectations of all who represent “Disability Inquisition Activities (DIA)”
- Our commitments to ensure effective action is taken when problems occur.

All staff will be aware of this policy. “Disability Inquisition Activities (DIA)” publish an annual Modern Slavery [statement](#) which outlines the actions we plan to take to identify, redress and mitigate the risks of modern slavery and human trafficking in our operations, implementing partners and supply chains. The statements report our progress against those plans and what we are learning about what works and what doesn’t.

RELATED DOCUMENTS

- [Ethical and Environmental Policy](#)
- [Prevention of Sexual Exploitation and Abuse](#)
- [Safeguarding Children Policy](#)
- [Safeguarding Adults Policy](#)
- [Survivor Policy](#)
- [Recruitment Policy](#)
- [Code of Conduct](#)
- [Non-staff Code of Conduct](#)
- [Disclosure of Malpractice in the Workplace Policy](#)
- [Anti-Bullying and Harassment Policy](#)
- [Complaints Policy](#)
- [Gender Equality Policy](#)
- [Employee Relations and Involvement Policy](#)
- [Reward Policies](#)


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VERSION CONTROL

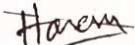
Version Number	Date Approved	Approved (Name & Title)	By	Brief Description of Changes
V2	September 2021	Safeguarding & Ethics Committee		<ul style="list-style-type: none">○ The key change to this policy is inserting the link with our Survivor Policy, which has been defined since the previous version of this policy was written. In particular, we understand that our survivor-centered approach (as defined in the Survivor Policy) is a foundational pillar that enables us to fulfil our corporate responsibility to identify, redress and mitigate modern slavery and human-trafficking.○ There are updated contact details for reporting a concern.○ The version now conforms to our standard policy template, to facilitate coherence.

POLICY CONTENTS

1.0 Definitions

Slavery today can manifest in various forms, including:

- work or service which the person did not voluntarily enter in to, or which is exacted under the menace of a penalty (**forced labor**).


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- transforming a debt into a mechanism of control over a person and then forcing people to work to pay off that debt (often with unfair/unattainable terms for repayment) (**bonded labor**).
- recruiting, harboring or transporting people, using violence, deception or coercion to achieve control over another person, for the purpose of exploitation (**trafficking in persons**)
- **child trafficking** is the recruitment, transportation, transfer, harboring or receipt of any person under the age of 18 years of age, for the purpose of exploitation. (I.e. by contrast to adults, children are defined as trafficked even if there has been no violence, deception or coercion.)
- **forced marriage** refers to situations where persons have been forced to marry without their consent. A marriage can be forced through a range of different mechanisms, including physical, emotional or financial duress; deception by family members, the spouse or others; or the use of force or threats or severe pressure.
- denying people who work in a home the freedom to leave the house, withholding wages or identity documents, limiting their contact with family (**domestic servitude**)
- **descent based slavery** also still exists (mainly in parts of Africa). When someone is born into a group or caste viewed as 'slave class' by their society.
- **child slavery** is the enforced exploitation of any person under the age of 18 years of age for their labor, used for someone else's gain.

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

2.0 Commitments

“Disability Inquisition Activities (DIA)”’s Directors and ultimately Council hold overall accountability for the effectiveness of this policy. It is the responsibility of all “Disability Inquisition Activities (DIA)” managers to ensure the delivery of this policy is integrated into daily decisions and practices. Any allegation of modern slavery or human trafficking will be dealt with in a robust and timely manner, in adherence with our survivor-centered approach, as defined by our [Survivor Policy](#).

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

3.0 Standards (must be measurable and reportable)

“Disability Inquisition Activities (DIA)” will not tolerate anyone associated with the delivery of its work carrying out any form of modern slavery or human trafficking. “Disability Inquisition Activities (DIA)” and its suppliers and partners are expected, as a minimum, to comply with all applicable international human rights standards, national legislation, statutory requirements and existing policies, including;

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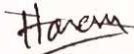
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- Suppliers: “Disability Inquisition Activities (DIA)” [Ethical and Environmental Policy](#)
- Staff: [Code of Conduct and Reward Policy](#)
- Partner Staff: [Non-Staff Code of Conduct](#)

In addition to the above, all staff, implementing partners and suppliers are expected to demonstrate commitment to meet the following standards;

Requirement to report / Zero tolerance to inaction on exploitation

This includes all forms of modern slavery and human trafficking through robust prevention and response work, offering support to workers and holding those responsible to account. In line with


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our safeguarding policies, “Disability Inquisition Activities (DIA)” requires anyone carrying out its work to report any concerns. There is no requirement to have evidence or know that the incident is definitely modern slavery or human trafficking; all reports will be investigated by specialist staff so that the right action is taken.

Fair Payment

- No worker should pay for a job - the costs of recruitment should be borne, not by the worker, but by the employer (‘employer pays’ principle)
- Wages should be paid directly to the worker, where “Disability Inquisition Activities (DIA)” is not the direct employer, appropriate checks should be in place to ensure the worker receives the correct wage.
- 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.
- Workers shall not be held in debt bondage or forced to work for an employer to pay off an incurred or inherited debt.

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.
- No worker has their identity or immigration documents destroyed, concealed, confiscated, or otherwise denied to them.

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

- 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 women and men. Appropriate steps are taken to raise awareness about these channels among stakeholders.
- All concerns or allegations of modern slavery or trafficking are responded to in a timely and appropriate manner, based on our Survivor Policy (and specifically using a survivor-centered approach).
- Disclosure in Disability Inquisition Activities (DIA)” annual Modern Slavery Statement of any incidents of modern slavery or human trafficking occurring within Disability Inquisition Activities (DIA)’s operations, implementing partners and supply chains.


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Principles to guide our anti-slavery and human trafficking policy

- Our guiding principle is to be **Survivor-Centered**: we are committed to the wellbeing and the wishes of the survivor of an incident being put at the centre of all actions taken. This includes ensuring: The safety and security of the survivor, any dependents, witnesses, or
- whistleblowers. Assurance that issues will be handled in confidence. The survivor's wishes (self-determination) and best interests are taken into account. The survivor is treated with dignity and respect, demonstrating belief and trust. Empowerment of the individual, their family, friends, and community. A timely response at each stage. No limitations on who reports or when they report. An individual can report a concern or incident at any time after it happens.

Everyone is able and encouraged to report.

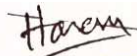
- Non-directive: we aim to empower survivors and complainants by helping them explore their options in safe ways without imposing our own opinions.
- Non-judgmental: we never judge survivors or complainants for their actions or decisions. We aim to empower survivors and complainants by helping them explore 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 organization to ensure safety and to prevent modern slavery.
- Independent investigations: through our Safeguarding team and working with local NGOs, trade unions, community organizations or authorities, we will carry out independent and discreet investigations, recognizing 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, radicalized and other discriminatory risks and 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, to drive wider change to tackle modern slavery and human trafficking in our operations, supply chains and business relationships.

4.0 Roles and Responsibilities

“Disability Inquisition Activities (DIA)” Directors and ultimately Council hold overall accountability for this policy and its effectiveness in practice. All “Disability Inquisition Activities (DIA)” managers are responsible for integrating its implementation into daily decisions, practices and performance measurement across the organization.

The Ethics Team is responsible for reviewing and updating this policy every three years and in line with good practice, legislative and organizational developments.

All staff, volunteers, implementing partners, suppliers and other representatives of


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“Disability Inquisition Activities (DIA)’s are required to adhere to this policy and “Disability Inquisition Activities (DIA)”’s Ethical and Environmental Policy at all times.

All “Disability Inquisition Activities (DIA)” “Disability Inquisition Activities (DIA)” “Disability Inquisition Activities (DIA)” “Disability Inquisition Activities (DIA)” “Disability Inquisition Activities (DIA)” “Disability Inquisition Activities (DIA)” “Disability Inquisition Activities (DIA)” employees are obliged to report any suspicions of modern slavery or human trafficking. 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 “Disability Inquisition Activities (DIA)”’s 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. DIA GB’s Ethics Team and Senior Management Teams can offer further support to help staff, volunteers and other representatives implement this policy.


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5.0 Consequences of non-compliance

“Disability Inquisition Activities (DIA)” will not tolerate anyone associated with the delivery of its work carrying out any form of modern slavery or human trafficking. “Disability Inquisition Activities (DIA)” and its suppliers and partners are expected, as a minimum, to comply with all applicable international human rights standards, national legislation, statutory requirements and existing policies, including;

- Suppliers: [DIA Ethical and Environmental Policy](#)
- Staff: [Code of Conduct and Reward Policy](#)
- Partner Staff: [Non-Staff Code of Conduct](#)

“Disability Inquisition Activities (DIA)” requires everyone carrying out its work to report any concern. The policy is **zero tolerance to inaction on exploitation**, including all forms of modern slavery and human trafficking.

Remediation

The wishes and best interests of survivors are the primary concern for interventions in modern slavery cases. Initial consequences of non-compliance may in rare cases include immediate termination of a supplier or partner or removing a worker from the situation. However, internationally, evidence has shown such actions may reduce the likelihood of an appropriate resolution for the survivor and could cause more harm. Therefore, our approach will be case-specific and will look for solutions that mitigate the survivors’ current situation, and prevent the risk of further harm, by:

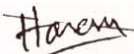
- Listening to survivors directly taking into account their needs and considerations expressed directly by themselves are first considerations.
- Engaging specialist local NGOs, trade unions, community organizations or authorities (where appropriate and safe).
- Where appropriate and safe, involving the police, where there are suspicions of serious and organized criminal involvement.
- Looking beyond the individual case to identify contributing factors and poor practice.
- Providing or facilitating workers’ safety, access to compensation and / or redress (for lost earnings or unpaid wages as well as for pain and suffering).
- Exploring possible ways of helping workers to secure alternative jobs or income.
- 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 “Disability Inquisition Activities (DIA)” to who will seek to ensure that remediation is in line with the above.

Disability Inquisition Activities (DIA)” 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 time bound progress.

Mitigation

All staff, volunteers, implementing partners and other representatives will have access to information about how to identify risks, report concerns or allegations of


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modern slavery and human trafficking.

- a) All managers, employees, volunteers and other representatives will have access to, and be aware of this policy and know the parameters of their responsibilities within it.
- b) Staff with specific responsibilities (e.g. managers, people who manage our suppliers and partners) will receive training on this policy.
- c) All managers are responsible for promoting awareness of this policy within their divisions, individual departments or teams and with suppliers and partners.
- d) Suppliers and implementing partners have demonstrated that they have sufficient checks and processes in place to ensure that they are in alignment with this policy.
- e) Concerns or allegations about modern slavery and human trafficking will always be taken seriously, investigated and where appropriate acted on.

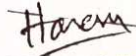
This policy will be used in conjunction with employment/labor, duty of care and relevant criminal laws to make decisions about how to respond to complaints and concerns raised by staff, volunteers and other representatives and suppliers.

Appendix 1

How to raise a Complaint or Concern

Anyone can raise a concern or make a complaint to “Disability Inquisition Activities (DIA)” about something they have experienced or witnessed. You can do this verbal or in writing to your Line Manager, HR, safeguarding focal point, the safeguarding team dia.ngo274@gmail.com or via “Disability Inquisition Activities (DIA)”. dia.org.bd Whistleblowing Service, ‘Speak Up’ either [online](#) or via email to dia.ngo274@gmail.com.

If an allegation is made against you, then you must inform your manager immediately. You should create a signed and dated record of the details as you know them and send a copy of this to HR. All those accused will be treated with respect and all allegations are treated confidentially. You may wish to seek support from your Union or Staff Representative.


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NOTES

i ETI Base Code Guidance: Modern Slavery
https://ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_guidance_modern_slavery_web.pdf, p41

ii Salient risks are defined as: 'The human rights at risk of the most severe negative impact through the company's activities and business relationships'. UN Guiding Principles on business and human rights, cited in:
<https://www.ungpreporting.org/resources/salient-human-rights-issues/>

iii https://www.ilo.org/global/publications/books/WCMS_575479/lang--en/index.htm, p21


iv Ibid, p22

v <https://www.antislavery.org/slavery-today/>

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

vii Where the humanitarian imperative is applied, "Disability Inquisition Activities (DIA)" will follow standards outlined in the Supply and Logistics Minimum Requirements for "First Phase" Humanitarian Response

viii <https://www.ethicaltrade.org/resources/base-code-guidance-modern-slavery>


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