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1. INTRODUCTION

People trafficking is a criminal act that violates fundamental human rights and the inviolable dignity and integrity of the human person. The Alliance of Bioversity International and CIAT (hereafter “the Alliance”) will operate a zero-tolerance policy for any form of trafficking in human beings, including children, women, and men. This Policy prohibits all individuals with whom, and entities with which, the Alliance works from engaging in any form of trafficking in human beings.

2. PURPOSE

2.1 The Alliance is committed to the highest levels of integrity and social responsibility. In line with the Alliance Code of Ethics and Conduct, the Alliance has adopted a zero-tolerance policy for human trafficking.

2.2 The Alliance is opposed to all forms of trafficking in persons and is committed to mitigating the risk of trafficking in persons in connection with its operations and workforce.

2.3 The Alliance is committed to full compliance with respective government laws, regulations, and policies that prohibit trafficking in persons in all locations of its operations, and with any other international regulations, as applicable.

Examples include the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; the UN Inter-Agency Coordination Group against Trafficking in Persons; and the Global Migration Group.

2.4 This Policy sets out the stance of the Alliance toward human trafficking.


3. APPLICABILITY

This Policy provides a global framework, respecting all applicable laws and regulations of the countries where we operate.

The Alliance respects the culture, traditions, and practices of the communities in which it works. The Alliance will comply with legislation in all operating jurisdictions whenever it is safe to do so.

If the Alliance Policy and procedures differ from local laws and our Policy has more rigorous expectations, the requirements of this Policy are in addition to any other applicable requirements.

When business transactions involve more than one country, we must find the best way to comply with all applicable laws. Whenever a possible conflict of laws arises, we should always seek guidance from the Legal Office.

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Country labor laws and procedures are the ultimate determining factor as to an employee’s eligibility for a particular entitlement in response to any complaints raised.

4. SCOPE

4.1 This Policy is to be applied across all Alliance activities and operations. It is the responsibility of the Alliance to make sure that its representatives, activities, and operations do no harm to the people the Alliance serves.

4.2 Alliance representatives working on behalf of the Alliance shall be aware of and adhere to this Policy when performing their duties and responsibilities, and in their personal conduct inside and outside of the workplace.

4.3 Alliance representatives are required to speak up and raise questions or concerns if someone is breaking our Policy, regardless of the person’s position in the Organization. We listen to them carefully and offer guidance when they need help, including identifying available resources for reporting.


4.4 Alliance representatives are encouraged to make reports in good faith of wrongdoing without fear of retaliation. The Alliance provides an anonymous Hotline for all Alliance representatives.

4.5 This Policy takes reference from international standards and national human trafficking laws to address human trafficking, including sex trafficking, slavery, involuntary or forced labor, and child labor, for all Alliance operations.

5. DEFINITIONS AND EXAMPLES

Alliance representatives: All regular staff (Internationally Recruited Staff (IRS) and Nationally Recruited Staff (NRS), Hosted Staff, Complementary Staff (Emeritus, Visiting Researchers, Consultants, Temporary Staff, and Fellows), associate members, Board members, and visitors to Alliance affiliates. “CGIAR representatives” refers to individuals who have a contractual relationship with CGIAR such as employees or staff, associates, volunteers, interns, consultants, Board members, and partners, including implementing partners, contractors, and other individuals and agents who work on behalf of or with CGIAR and its entities, or who have access to sensitive information about children as part of CGIAR’s programs.

Child is any person under the age of 18, regardless of the age of majority or age of consent.

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5.1. Examples of human trafficking


Trafficking in persons: The recruitment, transportation, transfer, harboring, or receipt of persons by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person by having control over another person for the purpose of exploitation.

- a) Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude, or the removal of organs.
- b) The consent of the victim of trafficking in persons to the intended exploitation set forth in this Policy shall be irrelevant when any of the means set forth in subparagraph (a) have been used.
- c) The recruitment, transportation, transfer, harboring, or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth in subparagraph (a) of this section.

Sex trafficking: This occurs when an individual receives threats of force, fraud, coercion, or any combination of such or is deceived into prostitution. The individuals' initial consent is not legally determinative if they later revoke consent but are forced to continue prostituting. They have become victims of sex trafficking. When a child or individual under the age of 18 is induced to perform a commercial sex act, the crime constitutes trafficking regardless of whether coercion, force, or fraud was used.

Involuntary or forced labor: This refers to all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself/herself voluntarily. It encompasses the range of activities – including recruiting, harboring, transporting, providing, or obtaining – involved when an individual uses force or physical threats, psychological coercion, deception, or other coercive means to compel another to work. It may also include restrictions on workers' freedom of movement, withholding of wages or identity documents, physical or sexual violence, threats and intimidation, or fraudulent debt from which workers cannot escape.

Child labor: This refers to work that is mentally, physically, socially, or morally dangerous and harmful to children, and interferes with their schooling by depriving them of the opportunity to attend school, obliges them to leave school prematurely, or requires them to attempt to combine school attendance with excessively long and heavy work. It does not include all work performed by minors; rather, only that which harms their physical and mental development. Such labor deprives children of their childhood, potential, and dignity.

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Slavery: This occurs when a person exercises the rights of ownership over another person. This includes the power to make the victim an object of purchase or to use his/her labor or services in a substantially unrestricted manner.

Servitude: This occurs when the victim does not consider himself/herself free to cease providing his/her labor or services or to leave his/her place or area of work because of the use of coercion, threats, or deception. To be in a condition of servitude, the victim must also be significantly deprived of his/her personal freedom.

6. GUIDING PRINCIPLES

The Alliance will not tolerate and will not condone human trafficking in any form, including sex trafficking, slavery, involuntary or forced labor, and child labor, in all its operations or in support of its operations. All those involved in the Alliance’s operations or in support of its operations shall


6.1 Not engage in or allow any form of human trafficking, whether by force, fraud, or coercion, or any form of involuntary servitude or slavery, or any form of sex trafficking, or the procurement of any commercial sex act.

6.2 Not use any form of involuntary or forced labor, including through the use of (a) threats of serious harm to, or physical restraint against, a person or another person; or (b) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not perform such labor or services, this person or another person would suffer serious harm or physical restraint; or (c) any abuse or threatened abuse of the law or the legal process.

6.3 Not engage in or support the use of child labor and shall comply with all applicable local child labor laws.

6.4 Not destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses.

6.5 Provide an employment contract or other required work document in writing. Not use misleading or fraudulent practices during the recruitment of employees or offering of employment and endeavour to the extent possible to disclose to employees, in a format and language accessible to them, basic information regarding the key terms and conditions of employment, including wages and fringe benefits if any and charging of employee recruitment fees.

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7. ROLES AND RESPONSIBILITIES

7.1 Alliance representatives, irrespective of where they are located, are responsible for


- i. Conducting themselves consistent with the Alliance Code of Ethics and Conduct.
- ii. Treating each other with understanding, dignity, and respect.
- iii. Ensuring that they have read and understood the Anti-Trafficking in Persons Policy.
- iv. Adhering to this Policy by not engaging in any form of involuntary servitude or slavery, or any form of sex trafficking or the procurement of any commercial sex act, or supporting and/or using child labor.
- v. Maintaining confidentiality in managing any investigation and related communications.
- vi. Raising any concern about potential human trafficking.
- vii. Complying with applicable country legislation regarding human trafficking.
- viii. Reporting any suspicion, allegation, or evidence of human trafficking.
- ix. Cooperating in any investigation related to human trafficking.
- x. Participating in training on the prevention of human trafficking and supporting the Ethics Senior Officer in awareness-raising campaigns involving third parties, in particular project staff and local communities.
- xi. Upholding the obligations set forth in this Policy and being aware of their duty of care, which means behaving in a manner that respects and fosters each other's rights and the rights of the people they serve.

7.2 The Alliance Board of Trustees is responsible for

- i. Championing the Anti-Trafficking in Persons Policy by providing support and guidance for the implementation of the Policy.
- ii. Participating in training on Alliance governance officials' obligations to preventing human trafficking.

7.3 The Senior Management Team is responsible for

- i. Demonstrating personal compliance with this Policy.
- ii. Building and promoting an ethical organizational culture and leading by example.
- iii. Ensuring that all staff have access to, are familiar with, and know their responsibilities pursuant to this Policy.
- iv. Ensuring that all members of the Alliance leadership team are fully trained and briefed on this Policy and receive support and guidance on its implementation in their operations.
- v. Ensuring that all Alliance representatives receive regular updates and training about this Policy and its application.
- vi. Taking decisive action concerning any breach of this Policy as warranted by the circumstances.
- vii. Protecting reporting parties who act in good faith from retaliation.

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7.4 Managers and supervisors are responsible for

- i. Building and promoting an ethical organizational culture and leading by example.
- ii. Demonstrating personal compliance with this Policy.
- iii. Ensuring that all Alliance representatives have access to, are familiar with, and know their responsibilities pursuant to this Policy.
- iv. When required, taking decisive action in regard to any breach of this Policy as warranted by the circumstances.
- v. Ensuring that all contractual agreements with partners and vendors who are associated with and work on behalf of the Alliance include a provision in which they agree to comply with this Policy.
- vi. Having a sourcing and selection process free from exploitation, enslavement, and engaging individuals below 18 years of age.
- vii. Ensuring that all Alliance representatives receive regular updates and training about this Policy and its application.

7.5 Alliance contractors and suppliers who supply any products or services are required to

- i. Review and adhere to the guiding principles of this Policy.
- ii. Comply with the national human trafficking laws and labor standards of the countries in which the respective services are being provided.

8. PREVENTION AND MONITORING


8.1 Raising awareness, communication, and dissemination of information

The Alliance will ensure consistent communication and dissemination of information to support effective implementation of this Policy across its global operations and to raise awareness about the prevention of human trafficking.

The outreach and communication efforts shall ensure that human trafficking materials are distributed to all Alliance staff and stakeholders, and that appropriate tools and channels are used for awareness-raising campaigns regarding human trafficking.

The Alliance is responsible for implementing awareness and training initiatives that provide proper and ongoing training to Alliance representatives and stakeholders, including vulnerable workers.

The Alliance works to build commitment among its partners at all levels to protect vulnerable persons from human trafficking-related risk in the development context.

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8.2 Training and workshops

The Alliance is responsible for incorporating the standards on human trafficking in recruitment documentation, induction programs and/or appropriate platforms, on-boarding materials/sessions, and training programs.


Alliance staff, associates, volunteers, partners, contractors, and all individuals working on behalf of the Alliance have a responsibility to ensure integrity in Alliance operations.

9. REPORTING AND RESPONDING TO TRAFFICKING IN PERSONS

9.1 Reporting channels

Any Alliance representative who is subject to, or who has knowledge of, or who witnesses any form of, trafficking in persons should immediately report such information through Lighthouse channels (see Annex 1) or use the alternative reporting channels as outlined in the Whistleblower Policy for all Alliance staff. Failure to report a concern, reasonable suspicion, or knowledge of misconduct in accordance with this Policy may result in disciplinary action.

- i.** The Alliance will manage sensitive information in a respectful and professional manner and comply with applicable laws. Retaliation against a staff member or other individual for reporting an incident or for participating in an investigation of an incident is a serious violation of this Policy and staff who are found to do so will be subject to disciplinary action.
- ii.** The Ethics Senior Officer and third-party providers are responsible for reviewing and investigating these allegations and ensuring a prompt response to all reported allegations. Cases involving allegations of human trafficking are high-priority cases. Complaints received should be acknowledged within 48 hours.
- iii.** Ethics Senior Officer and third-party providers will manage sensitive information in a manner that respects and fosters each other's rights and the rights of the people they serve in compliance with all applicable laws.
- iv.** Alliance representatives are expected to immediately report any actual or suspected situations of human trafficking.
 - a) Such reports of policy violations or inappropriate behavior can be made to the immediate supervisor, the Ethics Senior Officer, the local safeguarding focal point, HR contact person, or the alternative reporting channels.
 - b) If an Alliance representative knowingly chooses not to report an incident, then this act of his/hers will be considered as a breach of this Policy and he/she will be subject to relevant disciplinary action, including contract termination and/or removal from any association with the Alliance.

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- c) All incidents must be reported and managed in accordance with the Code of Ethics and Conduct Incident Reporting Process.
- d) If a report of human trafficking is made or concerns are raised in good faith, even if the situation is ultimately found to be untrue, no retaliatory action will be taken against the individual. If, however, the report is found to be malicious, the Ethics Senior Officer in consultation with senior leadership will decide on the course of action relating to disciplinary action.

9.2 Investigations

If the Alliance receives credible information from an employee report or any other source alleging prohibited trafficking-related activity, the Ethics Senior Officer will investigate and report its findings and determine what, if any, remedial action is appropriate following the process in Table 1 below.

The Ethics Senior Officer will also monitor Alliance management’s implementation of such remedial action.

The Alliance will cooperate fully with any agencies responsible for any investigations, audits, or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to Alliance facilities and staff. The Alliance will protect all employees suspected of being victims of or witnesses to prohibited activities and will not prevent or hinder these employees from cooperating fully with the authorities.

9.3 Disciplinary consequences for trafficking in persons


Any substantiated violation of this Policy will be considered an act of gross misconduct. Disciplinary action up to and including dismissal will be taken against employees and all those with a contractual relationship with the Alliance and up to and including termination of agreements with contractors and partners who are found to be violating any aspect of this Policy.

When appropriate, the Alliance will refer significant breaches of this Policy to the local law enforcement agencies with a view to initiating criminal prosecution. The Alliance will support survivors in reporting to law enforcement and in many cases will refer and report the case directly to statutory authorities.

Table 1. Decision to Investigate and Investigation Processes

	STAGE	PROCESS	BOT	DG	ESO	LO	HR
Process of decision to investigate	Case submission	<ul style="list-style-type: none"> - The reporter submits a concern or complaint through the reporting mechanism. This can be achieved by using an online portal, phone, or verbally. - The Whistleblower Reporting Mechanism issues an incident alert to actors that need to be informed. * If the allegation received is related to fraud, the ESO will be involved in the process. 		I	R	C	R
	Preliminary assessment of alleged Code of Conduct infraction	<ul style="list-style-type: none"> - Ethics Senior Officer performs a preliminary assessment to determine whether the incident report provides sufficient and credible information to investigate the alleged Code of Ethics and Conduct infraction. * If Senior Management and/or the DG/SMT is involved, the case will be assessed by the BOT. 		I	I	C	R
	Decision to investigate (or not)	<ul style="list-style-type: none"> - Ethics Senior Officer submits a report to the DG advising whether an investigation is warranted or not. - The DG decides, based on the information received, whether an investigation is required upon consultation with Ethics Senior Officer, and LO. - The DG decides whether other stakeholders need to be informed (donors, System Organization, etc.) and informs "how" the investigation will be commissioned, through an internal investigator or an external investigation group. 		A/R	I	C	R

STAGE	PROCESS	BOT	DG	ESO	LO	HR
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Investigation process	Investigation plan	<ul style="list-style-type: none"> - When it is decided to commission an incident investigation, Ethics Senior Officer drafts an investigation plan. The investigation plan consists of the following elements: objective, scope, and work plan to be carried out by the investigator. It also specifies who should conduct the investigation (internal/external), timing, reporting lines, and cost of the engagement. - The DG approves the investigation plan and signs the Terms of Reference upon consultation with LO. 		R	C	C	R
	Investigation	<ul style="list-style-type: none"> - The Ethics Senior Officer executes the procedures as agreed under the Terms of Reference. - If needed, the investigator consults with legal or other specialists in the Organization. 		I	I	C	R
	Reporting	<ul style="list-style-type: none"> - The investigator provides a final report to the DG and LO (findings). It is the responsibility of the DG to conclude whether the allegation is founded and to decide future actions. - The DG consults with other stakeholders as needed. - The DG will lead follow-up actions, such as a court case or a disciplinary action. - The DG ensures that other functions or other specialists are involved and informed on the results of the investigation as appropriate without compromising confidentiality. - Ethics Senior Officer informs the reporter on the results of the investigation. 	I	A/R	I	C	R

I: Informed A: Accountable R: Responsible C: Consulted (when appropriate).

10. COMPLIANCE PLAN


The Alliance maintains a written anti-trafficking compliance plan for sub-contracts and sub-awards that are for supplies to be acquired or services performed jointly with other partners. Sub-contractors and sub-awardees of covered agreements will be required to implement and submit a copy of their compliance plan to prevent the prohibited activities.

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11. ACCOUNTABILITY

11.1 Accountability for non-compliance with this Policy

Any staff found to have violated this Policy and other underlying documents and local laws may be subject to discipline up to dismissal or termination of their contract, or, depending on the violation, even referral to local authorities for possible criminal prosecution.

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11.2. Protection against retaliation

The Alliance prohibits retaliation against anyone who makes a good-faith report or participates in an investigation of a complaint under this Policy, or who otherwise acts to enforce or uphold this Policy. Individuals who are found to have engaged in retaliation will be subject to disciplinary action under the Alliance’s internal policies and procedures.

12. OTHER RESOURCES AND CONTACT INFORMATION

Legal Office

Address

The Americas Hub

Km 17, Recta Cali-Palmira CP 763537

Email

AllianceLegalOffice@cgiar.org

CGIAR Ethics & Integrity Office

Address

CGIAR System Management Office

1000, Avenue Agropolis

F-34394 Montpellier Cedex 5

France

Email


ethics@cgiar.org

13. RELATED POLICIES/REFERENCES FOR MORE INFORMATION

- Staff Code of Ethics and Conduct
- Talent Acquisition Policy
- Whistleblower Policy
- Disciplinary Code
- Sexual Harassment Policy

14. POLICY REVIEW AND APPROVAL

This Policy and its modifications shall need Senior Management Team approval and it will be managed and reviewed by the Ethics Senior Officer. The effective date of this Policy is **24 May 2021**. This Policy supersedes previous policies regarding this subject matter, and previous policies are considered rescinded.

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15. VERSION CONTROL

VERSION	DATE OF APPROVAL OF THE NEWEST VERSION	DESCRIPTION OF CHANGE	PREPARED BY:
00	21 May 2021	First Alliance Anti-Trafficking in Persons Policy	Rose Taremwa Maria Fernanda Bedoya
01	18 July 2024	Changed the URL of Lighthouse Services reporting line in Annex 1 from www.lighthouse-services.com/cgiar to https://www.lighthouse-services.com/AllianceBVlandCIAT	Nicole Demers
02	29 November 2024	Second Alliance Anti-Trafficking in Persons Policy Changed the responsibility of this function from Human Resources to the new Ethics Senior Officer.	Noukam, Franck Eric Approved by the Board of Trustees

Reviewed by:

Approved by:

	Approved virtually on 21 May 2021
Ingrid Lambert Global Human Resources Director Vanessa Riveros, Head, Organizational Development Unit	Senior Management Team (SMT)

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ANNEX 1. REPORTING CHANNES

Lighthouse Services is the Alliance’s external, independent, anonymous, and secure whistleblower service, which is available 24 hours a day, seven days a week. Staff may report any allegation through the following five channels:

On the website: Go to <https://www.lighthouse-services.com/AllianceBVlandCIAT>, click on the “Report an Incident” icon, and follow the instructions.

By telephone:

Find and dial your country number. Country numbers are available at <https://www.business.att.com/collateral/access.html>.

After connecting to your country number, dial the hotline number 800-603-2869.

Via email: Send an email to reports@lighthouse-services.com including the name Alliance Bioversity-CIAT in the subject and content of the email.

Via mail: Send the report to Lighthouse Services, Inc., 1710 Walton Rd., Suite 204, Blue Bell, PA 19422, USA. Be sure to include the Alliance’s name in the report.

Via fax: (215) 689-3885. Be sure to include the Alliance’s name in the report.