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## **Anti Human Trafficking Global Policy**

### **Policy Statement**

- Yugo is committed to being a responsible corporate citizen and at all times to act consistently with its values throughout its global operations. We are committed to a work environment that is free from human trafficking and slavery.
- Yugo employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom Yugo conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.
- Trafficking is considered the act of moving someone from one place to another for the purpose of enslavement. Slavery is the exploitation that happens once they arrive.
- Modern Slavery is an international crime, affecting tens of millions of people around the world, transcending age, gender and ethnicities.
- We maintain a broad-based and robust corporate ethics and compliance program that includes values, leadership, responsibility, training and audits to ensure compliance with applicable laws and a culture committed to ethics and integrity in all our business dealings and relationships. Yugo has established a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. To that end, Yugo implements and enforces effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- We expect the same high standards from all of our contractors, suppliers and other business partners. With respect to our supply chain, the geographic locations, markets and layers of direct and indirect suppliers and products may expose us to certain potential human trafficking and modern slavery risks. We mitigate these risks by including specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, in our contracting process. Additionally, we expect that our suppliers will hold their own suppliers to the same high standards.
- This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.



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- This policy does not form part of any employee's contract of employment and we may amend it at any time.

Someone is in modern 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.

Forms of modern slavery

- Forced labor – any work or services which people are forced to do against their will under the threat of some form of punishment.
- Debt bondage or bonded labor – the world's most widespread form of slavery, when people borrow money they cannot repay and are required to work to pay off the debt, then losing control over the conditions of both their employment and the debt.
- Human trafficking – involves transporting, recruiting or harboring people for the purpose of exploitation, using violence, threats or coercion.
- Descent-based slavery – where people are born into slavery because their ancestors were captured and enslaved; they remain in slavery by descent.
- Child slavery – many people often confuse child slavery with child labor, but it is much worse. While child labor is harmful for children and hinders their education and development, child slavery occurs when a child is exploited for someone else's gain. It can include child trafficking, child soldiers, child marriage and child domestic slavery.
- Forced and early marriage – when someone is married against their will and cannot leave the marriage. Most child marriages can be considered slavery.

Forms of Trafficking

- Sex Trafficking – the action or practice of illegally transporting people from one country or area to another for the purpose of sexual exploitation.
- Labor Trafficking – the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery.
- Drug Trafficking – the cultivation, manufacture, distribution, supply and sale of illegal and controlled substances which are subject to drug prohibition laws.



## Yugo Commitments

•	All Yugo employees are required to confirm their understanding and compliance with this policy during their company induction & orientation program.
•	The prevention, detection and reporting of modern slavery and human trafficking in any part of the business or supply chain is the responsibility of all those working for Yugo or under their control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
•	Employees must notify their line manager as soon as possible if they believe or suspect a conflict with this policy has occurred or may occur in the future.
•	Employees are required to raise concerns about any issue or suspicion of modern slavery or trafficking in any parts of the business or supply chains of any supplier at the earliest possible stage.
•	If an employee believes or suspects a breach of this policy has occurred or that it may occur, they must notify their line manager or report it People and Culture as soon as possible.
•	If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Yugo's supply chain constitutes any of the various forms of modern slavery, the employee should raise it with their line manager.
•	Yugo aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any of its supply chains. Employees are required to report any conduct believed to be a violation to this policy to the legal or human resources (people and culture) department. Any reports of concerns can be raised confidentially through <a href="mailto:feedback@yugo.com">feedback@yugo.com</a>
•	In the USA, reports may also be made through the UComm, LLC co-employer ADP at 844-448-0325 which allows anonymous reporting as permitted by applicable law.

## Process

This policy applies to all employees, consultants, contractors, trainees, seconded staff, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with Yugo USA LLC.

The policy also applies to Officers, Trustees, and Board members.



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## **References and Further Reading**

- Global Disciplinary Policy
- Work Health Policies
- Code of Conduct
- Equality and Diversity policy
- <https://archive.acas.org.uk/dresscode>
- <https://www.jobjumpstart.gov.au/article/why-personal-presentation-so-important>