CRDFGLOBAL	Title	**Prohibition on Trafficking in Persons Policy**		
	Owner	VP, Risk Management & Compliance	Department	Risk Management & Compliance
	Date	December 2025	Review Cycle	Annual

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1. Policy Statement

CRDF Global has zero tolerance for the trafficking in persons, solicitation or obtaining any commercial sex act, use of debt bondage, the use of slave or forced labor, or of child labor. No CRDF Global employee, contractor, or other Covered Party defined in this policy, shall engage in or be involved in any such activity. CRDF Global will take appropriate action, up to and including termination or employment, referral to law enforcement, or other action if any party is found to have engaged in any activity set forth in this policy or was aware of such activity and failed to report it.

It is the responsibility of all Covered Parties to strictly abide by this policy, the substance of which will be incorporated into all employment agreements or contractual agreements entered into by CRDF Global. All Covered Parties shall read with and comply with the prohibitions set forth herein and report any suspected violations to management immediately.

Employees that suspect violations of this policy by other CRDF Global employees, vendors, or other Covered Parties must notify CRDF Global management directly or contact the CRDF Global hotline (http://crdfglobal.alertline.com)

All contracts and agreements issued by CRDF Global must include the reference to this policy and identify additional compliance requirements regarding the U.S. Government's prohibition on trafficking of persons (*See, e.g.*, FAR 52.222-50) as well as the laws of other nations. CRDF Global shall make our vendors and suppliers aware of, and expect their compliance with, CRDF Global's human rights commitments, including our prohibition on trafficking in persons and any related behavior. CRDF Global shall conduct annual reviews of vendors and suppliers to ensure that they are aware of and complying with this policy. If any Covered Party is found to have engaged in such behavior, CRDF Global will take appropriate action, up to and including the termination of the business relationship and reporting of the incident to local authorities and law enforcement in accordance with applicable local laws and regulations.

2. Purpose

The trafficking in persons and related activities is strictly prohibited by U.S. and international laws and is in direct contravention of our organizational values. This policy articulates how CRDF Global complies with this prohibition.

Covered Parties working inside or outside of the United States must comply with numerous laws, regulations, rules, and executive orders of the United States Government, the laws of other nations, and applicable local laws. Covered Parties identified within this policy must be made aware of the requirements relating to their duties sufficient to enable them to recognize potential dangers and to know when to seek advice from CRDF Global management. Violations of laws, regulations, rules, and orders may subject the Covered Party to individual criminal or civil liability, as well as to discipline by CRDF Global. Such individual violations may also subject CRDF Global to civil or criminal liability and/or the loss of business.

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3. Scope

The prohibition on human trafficking applies to all CRDF Global employees, both in the United States and abroad. In addition, this policy applies to all CRDF Global subcontractors, consultants, participants, and any party with whom CRDF Global conducts business.

4. Definitions

Commercial Sex Act	Any sex act on account of which anything of value is given to or received by any person.
Covered Party	Any employee, partner, subcontractor, supplier, distributor, or vendor that is employed by or conducts business with CRDF Global.
Forced Labor	Knowingly providing or obtaining the labor or services of a person by threats of serious harm to or physical restraint against that person or another person; by means of any scheme, plan, or pattern intended to cause that person to believe a failure to perform would result in serious harm or physical restraint; or by means of the abuse or threatened abuse of law or the legal process.
Sex Trafficking	Recruitment, harboring, transportation, provision, or obtaining of a person for commercial sex by force, fraud, or coercion, or when the person induced to perform such an act is under 18.
Trafficking In Persons	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, commercial sex acts, or slavery.

5. Exclusions

{Identify activities and/or individuals/divisions and/or region which are not covered/governed by the policy. If no exclusions apply, simply indicate "None".}

[TEXT]

6. Additional Content

{Identify and define any additional content that needs to be added to this policy format.}

[TEXT]

7. Related Documents

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Related CRDF Global Documents

CODE OF CONDUCT
Grant Management Policy.docx
Grant Risk Management Policy.docx
Procurement Policy.docx

External References

External Reference	Description
22 U.S.C. § 7104	Trafficking Victims Protection Act
FAR 52.222-50	Federal Acquisition Regulation: Combatting Trafficking in Persons
Executive Order 13627	Strengthening Protections Against Trafficking in Persons in Federal Contracts

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