

**«APPROVED»
by the Minutes
of the Board of Trustees
of CO «CF «ADRA Ukraine»
dated «26» November 2024**



**Anti-Trafficking Policy
CO «CF «ADRA Ukraine»**

General Provisions

1.1 Purpose of the Policy

The purpose of this Policy is to establish the principles, mechanisms, and procedures for preventing, detecting and combating human trafficking within the framework of the activities of CO CF ADRA Ukraine.

1.2 Policy Principles

The main principles of CO CF ADRA Ukraine's activities in combating human trafficking include:

- **Legality** — Adherence to national and international legal regulations.
- **Non-Discrimination** — Guaranteeing equal rights and protection for all individuals, irrespective of gender, age, race, or social status.
- **Privacy** — Ensuring the safety and confidentiality of affected individuals and whistleblowers.
- **Inevitability of Punishment** — Ensuring that all violations related to combating human trafficking are thoroughly investigated, and perpetrators are held accountable.

Regulatory and Legal Framework

This Policy is based on the current legislation of Ukraine and international standards for combating human trafficking, including:

- Law of Ukraine “On Combating Human Trafficking” dated 20 September 2011;
- Criminal Code of Ukraine (Article 149 — Trafficking in persons or other illegal transactions regarding an individual);
- UN Convention on the Elimination of All Forms of Discrimination against Women;
- The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the UN Convention against Transnational Organized Crime.

Terms and Definitions

3.1 Human Trafficking

Human trafficking is defined as the recruitment, transportation, transfer, harbouring, or receipt of individuals for the purpose of their exploitation, including forced labour, sexual exploitation, organ trafficking, or other forms of violence or exploitation.

3.2 Victim of Human Trafficking

A victim of human trafficking is an individual who has been subjected to actions constituting human trafficking, irrespective of their consent to such actions.

3.3 Exploitation

Using a person for any activity that violates their rights, freedoms, and dignity, including forced labour, sexual exploitation, slavery or conditions akin to slavery, involvement in criminal activities, etc.

Measures to Prevent Human Trafficking

4.1 Risk Assessment

CO CF ADRA Ukraine is committed to systematically assessing the risks of human trafficking within each project or program. Special attention is given to vulnerable groups most at risk of human trafficking, including children, women, displaced persons, and migrants.

4.2 Information and Education

All employees of the organization undergo mandatory training on combating human trafficking. The training programs include:

- Clarification of legal mechanisms for the protection of victims of human trafficking.
- Familiarization with the procedure for identifying victims.
- Methods to prevent the exploitation of individuals.

4.3 Control Over Partners and Contractors

CO CF ADRA Ukraine monitors its partners and contractors to ensure that no party is involved in human trafficking. Contracts with partners include provisions for strict liability in cases of participation in actions that could be considered human trafficking.

Procedure for Reporting Violations

5.1 Complaint Submission Mechanism

Any individual who has witnessed or suspects cases of human trafficking has the right to report them to CO CF ADRA Ukraine through the following channels:

- Anonymous electronic complaint forms to be filled out on the website and submission of complaints by email:
- Filing a complaint by e-mail: Protection@adra.ua
- Anonymous online form to be filled out on the website: <https://www.adra.ua/anonymous-complaint/>
- Telephone support lines: **0 800 20 13 30**;
- Personal appeal to the person responsible for gender equality: Contact **the Protection Specialist** (by calling the hotline, where the operator will transfer the call to a specialized specialist)

5.2 Investigation

Each report of human trafficking is investigated within a specified timeframe by the appropriate commission appointed by the organization's management. If the fact of the violation is confirmed, individuals involved in human trafficking are subject to disciplinary measures, including referral of the case to law enforcement agencies.

5.3 Protection of Witnesses

Individuals who report human trafficking, as well as victims of such acts, are safeguarded from any form of prosecution. The organization ensures the confidentiality and safety of such individuals.

Support for Victims

6.1 Immediate Assistance

CO CF ADRA Ukraine provides immediate assistance to victims of human trafficking, including:

- Temporary residence and protection;
- Medical Aid;
- Psychological support;
- Legal assistance to ensure legal rehabilitation.

6.2 Rehabilitation and Reintegration

The organization facilitates the long-term rehabilitation of victims of human trafficking through:

- Professional training;
- Social adaptation;
- Job search and social integration.

Responsibility for Policy Implementation

7.1 Monitoring and Control

CO CF ADRA Ukraine regularly conducts internal audits of the implementation of the anti-trafficking policy. Based on the results of each project, an assessment of compliance with the standards of protection and prevention of human trafficking is carried out.

7.2 Disciplinary Measures

Individuals who violate the requirements of this Policy are subject to disciplinary action, including possible dismissal or referral to court in accordance with the Criminal Code of Ukraine (Article 149)

Policy Review

The Policy is subject to mandatory review every three years, or earlier in the event of changes in legislation or the emergence of new risks related to human trafficking. The Policy is updated on the basis of reports on the effectiveness of its implementation and new legislative requirements.

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