

CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION

Annex 1 to Order No. 8-org
dated 1 May 2026



(signature / seal)
Oleksandra KARPENKO
CEO of the Foundation CO SPANBOND CF

POLICY ON COMBATING TRAFFICKING IN PERSONS OF THE CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION

The CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION (hereinafter referred to as "SPANBOND") strongly condemns trafficking in persons, whether children, women or men. This Policy on Combating Trafficking in Persons (hereinafter referred to as the "Policy") prohibits all persons with whom SPANBOND cooperates or interacts from engaging in any form of trafficking in persons. Trafficking in persons is a criminal offence that violates fundamental human rights, as well as the inherent dignity and integrity of the individual. Persons who organize, commit or are otherwise involved in trafficking in persons shall be held liable in accordance with the Criminal Code of Ukraine.

The purpose of this Policy is to communicate to all SPANBOND employees the fundamental principles and rules governing their work, pursuant to which SPANBOND condemns any form of abuse or exploitation of individuals and seeks to protect its employees, all SPANBOND Representatives and beneficiaries, given their particular vulnerability.

All persons covered by this Policy are prohibited from engaging in trafficking in persons, whether children, women or men.

DEFINITIONS AND TERMS

Beneficiaries: For the purposes of combating trafficking in persons, SPANBOND applies a broad definition of the term "beneficiary" to include not only the direct beneficiaries of a particular project, but also any child or adult who forms part of an affected population and who may suffer harm as a result of the actions of SPANBOND Representatives carrying out their activities. **Trafficking in Persons** means the recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or of a position of vulnerability, or the giving or receiving of payments or benefits to obtain the consent of a person having control over another person, for the purpose of exploitation.

SPANBOND Representatives means any person representing SPANBOND, including all permanent, temporary and part-time employees and personnel; members of the Board; interns; volunteers; visitors to SPANBOND, including media representatives; contractors, including suppliers of services or goods; and consultants.

I. GENERAL REQUIREMENTS AND PROHIBITIONS FOR THE PREVENTION OF TRAFFICKING IN PERSONS

1. All SPANBOND employees undertake the following obligations and acknowledge that:

- They are prohibited from engaging in trafficking in children, women or men for the purpose of sexual exploitation or the purchase of any sexual services for payment, even where such practices are lawful in a particular jurisdiction, including, but not limited to, forced prostitution, child prostitution and child pornography;
- They must not participate in trafficking in women or girls for the purpose of forced or arranged marriage, or in any arrangements involving the payment of a bride price;
- It is prohibited to engage in trafficking in children, women or men for the purpose of organ removal and illegal organ trafficking, or for the illegal trade in or trafficking of narcotic drugs;

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- It is prohibited to use force, fraud or coercion to compel a child, woman or man to engage in forced labour, begging or involuntary servitude;
- It is prohibited to subject any child, woman or man to labour under threat of serious harm to that person or to another person.

2. SPANBOND prohibits employment practices associated with trafficking in persons, including:

- Destroying, concealing, confiscating or otherwise denying an employee access to their identity documents or immigration documents;
- Using misleading or fraudulent recruitment practices, including failure to disclose key terms and conditions of employment;
- Using recruiters who do not comply with applicable labour laws;
- Charging employees recruitment fees;
- Failing to provide an employment contract or other employment documentation where required by law;
- Knowingly obtaining goods or services that have been provided or produced through trafficking in persons or forced labour.

3. SPANBOND standards for combating trafficking in persons:

- All remuneration paid to SPANBOND employees shall comply with the requirements of the applicable legislation of Ukraine;
- Transparent recruitment practices, including hiring and candidate selection, shall be applied. All key terms and conditions of employment, including remuneration, must be fully and accurately disclosed in a language understood by the employee;
- Appropriate measures shall be taken to ensure that all partners, beneficiaries, consultants, contractors, volunteers, interns and any other persons actively participating in the ADRA programme comply with this Policy.

II. REPORTING AND ACCOUNTABILITY

1. Reporting, Monitoring and Investigation

Any person covered by this Policy, and employees in particular, must report any actual or suspected violations and cooperate fully with any investigation into such violations.

SPANBOND shall endeavour to protect the identity of any person who reports a violation and does not wish their name to be disclosed. However, it should be understood that the investigation of a potential violation may require disclosure of the source of the information. The reporting person's statement may also be required as part of the evidence collected during the investigation, including an investigation conducted within criminal proceedings.

Persons who submit reports to SPANBOND, including employees, should be aware that where an allegation is made in good faith but is not substantiated following an investigation, SPANBOND guarantees that no action will be taken against the complainant. However, where a person makes an allegation that they know to be false, disciplinary action may be considered against that person if they are a SPANBOND employee.

2. Disciplinary Consequences

Where a report that a SPANBOND employee has engaged in trafficking in persons is substantiated and that employee is found guilty of the offence by a court, SPANBOND shall immediately terminate the employment relationship with that employee.

If SPANBOND becomes aware that a partner, contracting party or any of its employees is suspected of, or has been reported for, potential involvement in trafficking in persons, SPANBOND shall immediately give notice and initiate the procedure for early termination of the relevant contractual relationship.

SPANBOND, acting through its duly authorised employees, shall immediately report any violation of the requirements and provisions of this Policy to the competent law enforcement authorities.