

# Anti-Human-Trafficking and Anti-Sexual Exploitation Policy

## **Purpose**

Thyme Hongkong Co Limited is committed to a work environment that is free from human trafficking and slavery. Thyme Hongkong Co Limited will now no longer tolerate or condone human trafficking – a contemporary-day shape of slavery – in any a part of its enterprise or commercial enterprise relationships. Trafficking in people is a global crime related to the purchase of a individual via the usage of force, fraud or coercion, or wherein the individual brought on to carry out such act has not attained 18 years of age, for the motive of exploiting the individual, person or child, for earnings via pressured labour, prostitution or both. It constitutes a contravention of human rights wherein the sufferers are disadvantaged in their essential freedoms. It additionally complies with the necessities of Federal Acquisition Regulation Subpart 22.17 and 52.222–50.

## Scope

The Policy applies to all personnel employed by or engaged to provide services to Thyme Hongkong Co Limited, including, but not limited to, employees, officers, temporary employees, contingent workers (which includes organization workers), informal staff, and independent contractors (together herein mentioned as "employees"). Every Thyme Hongkong Co Limited employee is responsible for reading, understanding and complying with this Policy.

#### **Policy**

Thyme Hongkong Co Limited has a policy prohibiting human trafficking and trafficking-related activities. Pursuant to Thyme Hongkong Co Limited Policy, forced, bonded (including debt bondage) or indentured labour, commercial sex, involuntary prison labour, slavery, or trafficking of persons shall not be used or tolerated. This consists of transporting, harbouring, recruiting, shifting or receiving humans for labour or offerings by using threat, force, coercion, abduction or fraud with the motive of involuntary servitude, peonage, debt bondage or slavery. Further, as required by law, and pursuant to



the Policy, Thyme Hongkong Co Limited, its employees, contractors, subcontractors, agents, vendors, suppliers, partners and others through whom Thyme Hongkong Co Limited conducts business, shall not:

- 1. Engage in any form of trafficking in persons during the performance of the contract;
- 2. Procure commercial sex acts during the performance of the contract;
- 3. Use forced labour in the performance of any work related to the contract;
- 4. Destroy, conceal, confiscate, or in any other case deny employees access to employee identification or immigration documents, which include passports or drivers' licenses, irrespective of issuing authority;
- 5. Use deceptive or fraudulent practices at some point of the recruitment of personnel or providing of employment, which include failing to disclose, in a layout and language reachable to the worker, basic records or making material misrepresentations all through the recruitment of personnel concerning the key items and situations of employment, which includes wages and fringe benefits, the area of work, the living conditions, housing and associated costs (if provided or arranged by Thyme Hongkong Co Limited or its agent), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- 6. Use recruiters that do not comply with local labour laws of the country in which the recruiting takes place;
- 7. Charge applicants/candidates/employees recruitment fees;
- 8. If required by law or contract, fail to provide return transportation or fail to pay for the cost of return transportation upon the end of employment;
- 9. If required by law or contract, fail to provide or arrange housing that meets the host country housing and safety standards; or
- 10. If required via means of regulation or contract, fail to offer an employment contract, recruitment agreement, or different required work file in writing. Such a written work file will be in a language the worker understands. If the worker needs to relocate to carry out the work, the work file will be supplied to the worker a minimum of five (5) days prior to the worker relocation. The worker's work file shall include, however isn't always confined to, information about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and related costs, time off, roundtrip transportation arrangements, grievance process, and the content material of relevant legal guidelines and guidelines that restrict trafficking in persons.



Each employee, contractor, subcontractor, and agent of Thyme Hongkong Co Limited is responsible for ensuring compliance with this Policy. Any violation of this Policy may want to bring about for disciplinary action, as much as and including, elimination from a contract, discount in benefits, termination of a commercial enterprise relationship, or termination of employment, situation to relevant law. Violation of relevant legal guidelines can also bring about criminal prosecution of responsible individuals.

# **Investigations and Audits**

Thyme Hongkong Co Limited may perform investigations and audits to verify that business is being conducted in compliance with this Policy. All Thyme Hongkong Co Limited employees and third parties through whom Thyme Hongkong Co Limited conducts business are required to fully and promptly cooperate with any auditors and investigators, and ought to respond completely and genuinely to any inquiries and requests for documents. Any failure to completely cooperate or restrict any research or audit can be grounds for disciplinary action, up to and inclusive of termination, subject to relevant laws.

## Reporting

Credible data concerning a potential violation of this Policy, whether or not via way of means of an employee, agent, contractor, vendor, subcontractor, supplier, partner, and others via whom Thyme Hongkong Co Limited conducts business, ought to be right away mentioned to the Human Resources Department or the Legal Department, or it may be mentioned anonymously via Alertline +852-5808-2130. Employees who fail to document confirmed or suspected human trafficking (while there are affordable grounds to consider it exists) can be deemed in violation of this Policy as approved via way of means of relevant law.

Thyme Hongkong Co Limited will now no longer tolerate retaliation against an employee for reporting a situation in true faith or for cooperating with a compliance investigation associated with this Policy, even if no proof is determined to verify the file.

Signed and Adopted on 02<sup>nd</sup> January, 2018