EXHALE
Health Foundation

Human Trafficking and Modern Slavery Policy and Procedures

Policy reference EHF MS 05 | Version 1.0 | Policy owner: Executive Lead | Prepared 1 June 2026

Purpose and commitment

Exhale Health Foundation (EHF) will not use or knowingly benefit from human trafficking, slavery, servitude, forced labour, debt bondage or exploitative child labour. We will act to prevent these practices in our recruitment, programmes, partnerships, and supply chains, and respond in ways that protect affected people.

This policy will apply to trustees, staff, project workers, consultants, advisers, volunteers, recruitment agencies, suppliers and partners acting for EHF. Its requirements will apply to office work, field research, training, accommodation, travel, catering, cleaning, security, interpretation, IT and other purchased services. We will assess supplier assurances in proportion to risk; a signed declaration alone will not establish that the supply chain is free of exploitation.

Meaning and warning signs

Forced labour will mean work or services demanded under threat of a penalty that a person has not freely agreed to perform. A penalty may include violence, threats, withheld pay, debt, immigration threats or restrictions on leaving. **Human trafficking** will involve recruitment, transport, transfer, harbouring or receipt of a person through coercion, deception, abuse of vulnerability or other prohibited means for exploitation. For children, proof of such means will not be required for conduct to amount to trafficking. Warning signs may include confiscated identity documents, recruitment debts, unexplained wage deductions, workers unable to speak privately or leave employment, restricted movement, threatening supervisors, unsafe accommodation, excessive involuntary overtime and a person appearing controlled by someone else. No single indicator will prove a case, but staff will not ignore combinations of concerns.

Responsibilities

The trustees will oversee implementation and ensure independent review of leadership-related concerns. The Executive Lead will assign an operational focal point, ensure procurement and recruitment procedures reflect this policy, and arrange support or specialist advice when needed. Project and procurement leads will assess risks before engaging workers and suppliers and will monitor agreed safeguards.

Everyone representing EHF will report concerns promptly and avoid conduct that increases a person's danger. Staff will not confront an alleged trafficker, promise immigration outcomes, undertake a rescue or investigate criminal activity themselves. EHF will work with competent protection and law-enforcement services as appropriate, taking account of the person's safety and applicable reporting duties.

Fair recruitment and working conditions

- Work will be voluntary and based on clear written terms in a language the worker understands. Terms will identify the work, location, pay or fees, working time, lawful

deductions, notice and complaint arrangements. An employment label will not be used to evade the legal rights attached to the actual working relationship.

- Workers will not pay recruitment fees or related placement costs to EHF or its agents. Recruitment agencies will be required to follow this rule and disclose their subcontracting arrangements. Where fees have been charged, EHF will seek a safe remedy, including reimbursement by the responsible party where appropriate.
- EHF will not retain original passports or identity documents as a condition of work, impose deposits, restrict lawful movement or prevent a person leaving with reasonable lawful notice. Any necessary temporary handling of an original document will be documented, and the document returned promptly.
- Pay will meet applicable legal requirements and agreed terms. Staff will not withhold earned pay to compel continued work, use punitive debt arrangements or require involuntary excessive overtime. Workers will have reasonable rest, safe conditions and accessible complaint routes.
- EHF will not employ anyone under 18 in its own workforce. Educational activities involving children will require an approved safeguarding arrangement and will not be used as a source of unpaid labour. Suppliers will comply with applicable minimum-age rules and will not use hazardous or exploitative child labour.
- Staff, consultants and volunteers will not be threatened, misled or pressured to accept exploitative conditions. Volunteering will be genuinely voluntary, with a clear role, agreed expectations and freedom to withdraw.

Supplier and partner procedure

Assess risk before selection. The requester will consider the service, labour intensity, location, use of agencies, migrant labour, subcontracting and unusually low pricing. Higher-risk services may include labour recruitment, cleaning, security, construction, hospitality and some equipment supply chains.

Obtain proportionate evidence. EHF will confirm the supplier's identity and capability and ask how workers are recruited, paid, supervised and able to complain. Higher-risk engagements will require additional evidence, such as recruitment terms, labour-provider details or suitable independent checks. Information requests will avoid collecting workers' personal data unnecessarily.

Set contractual expectations. Agreements will prohibit forced labour, trafficking and exploitative child labour; require lawful employment and recruitment practices; require disclosure of relevant subcontracting; and provide for reporting, proportionate verification, corrective action and termination where appropriate. Contractual access to records will respect worker privacy and safety.

Verify where risk justifies it. EHF may use private, voluntary worker conversations, appropriate site checks or independent assessments. Workers will be informed why information is requested and how it will be used. Interviews will not take place in a way that exposes a worker to retaliation. A supplier's refusal to allow proportionate verification will be assessed as a warning sign.

Monitor and review. Project leads will review concerns, supplier changes, complaints and evidence of labour conditions during delivery, rather than relying only on the original procurement check. Substantial concerns will be escalated before renewal, further payment or a new commitment.

Procedure for concerns and disclosures

Secure immediate safety. If someone is in immediate danger, staff will contact an appropriate local emergency or protection service and move to a safe place where possible. They will avoid actions likely to alert a controller or increase the person's risk. Children will be supported in line with the Safeguarding Policy.

Receive and record carefully. Staff will listen without judgement, avoid leading questions and establish a safe way to communicate. Only essential details will be recorded. They will explain that information may need to be shared to protect someone or meet a legal duty, and will not promise absolute confidentiality.

Report promptly. Concerns will be reported immediately to the designated focal point, Executive Lead or an unconflicted trustee. General contact will be exhalehealthfoundation@gmail.com or +234 815 546 5671. Direct independent reporting details will be supplied at induction. Anonymous reports will be considered, and honest reporters will be protected from retaliation.

Arrange specialist referral. The focal point will assess risks with appropriate expertise and consider referral to NAPTIP, relevant law enforcement, child-protection or trusted support services. Adult survivors' wishes and informed consent will normally guide support referrals, subject to mandatory legal duties and an overriding immediate safety risk. Staff will verify current local services and contact details before higher-risk activities.

Control the EHF relationship. The Executive Lead or independent trustee will consider pausing unsafe work, withholding a new commitment and commissioning an independent review. Client and statutory notifications will be made as required. Relevant incidents affecting clients' work will be reported immediately to an approved channel, using the minimum necessary personal information.

Remedy and responsible action

Where exploitation is identified, EHF will seek a documented corrective plan that addresses immediate safety, access to documents, unpaid wages, recruitment debts and safe working conditions where relevant. EHF will specify responsibilities, deadlines, and independent follow-up. EHF will not make workers bear the cost of remediation or punish them for reporting.

EHF may need to end a supplier relationship where serious abuse persists or lawful safeguards cannot be achieved. Before disengaging, EHF will consider foreseeable effects on affected workers and obtain specialist advice where needed. It will not continue prohibited or dangerous practices merely because a supplier promises future improvement. Referrals and preservation of evidence will not depend on commercial convenience.

Records training and review

EHF will retain risk assessments, recruitment checks, supplier due diligence, contract clauses, concerns and corrective-action records with restricted access. Personal data will follow the Data Protection Policy; sensitive cases will have a documented retention basis and legal holds where necessary. Non-sensitive procurement and compliance records will normally be retained for seven years after the engagement closes, unless a different lawful requirement applies.

Induction will cover warning signs, fair recruitment and safe reporting. The focal point will review high-risk suppliers and outstanding actions periodically and report at least annually to trustees. EHF will review the policy annually and after a serious incident or material change in its activities. Any requirement to publish a statutory modern-slavery statement will be assessed separately; this policy will not be represented as evidence that a reporting threshold applies to EHF.

Practical records to maintain

- Labour-risk assessment: service and location; labour providers and subcontractors; recruitment and wage risks; evidence reviewed; mitigations; approver and review date.
- Worker concern record: essential facts; safe contact arrangements; immediate risk; consent and disclosure considerations; specialist referrals; action owner and follow-up.
- Corrective-action plan: harm and responsible party; worker-centred remedy; deadlines; verification method; consequences of non-compliance; closure and lessons.

Legal and professional references

NAPTIP official information and referral services

ILO guidance on business and forced labour

ILO fair recruitment principles and guidance

Approval and implementation

This policy will take effect on the approval date recorded below. The Board of Trustees, or a trustee with documented delegated authority, will approve the policy and record the operational appointments. An implicated person will not approve or oversee a case concerning themselves.

Approved by: Dr Kelly Elimian **Position**: President/Executive Director

Signature:  **Approval and effective date**: 1st July 2026

Operational focal point: Dr Florence Amiewalan **Direct contact:** +2348035090922

Independent trustee or alternate: Prof. Nosa Eghafona **Direct contact:** +2348034468560

Next review due: 1st June 2027 **Adoption record reference**: Board resolution dated 1st July 2026

Before implementation, the Executive Lead will confirm named contacts and access permissions, brief the people covered by this policy, establish the required records and communicate relevant reporting routes. No activity requiring prior safeguards or approval will begin until those controls are in place. Staff will acknowledge the policy at induction and after material revisions.