

EarthLungs Reforestation Foundation – Modern Slavery Policy

1. Policy Statement

At EarthLungs Reforestation Foundation, we are deeply committed to upholding human dignity and protecting fundamental human rights in all our operations. We have a zero-tolerance approach to modern slavery in any form, including forced labour, child labour, bonded labour, human trafficking, servitude, and exploitative labour practices.

As an organization working closely with forest-adjacent communities, contractors, suppliers, and partners, we recognize our responsibility to ensure that no person is subjected to coercion, intimidation, exploitation, or abuse in connection with EarthLungs activities.

This policy sets out our commitment and approach to preventing, identifying, and responding to modern slavery risks within our workforce and supply chains.

2. Scope of the Policy

This policy applies to all:

- EarthLungs employees (permanent, contract, and temporary)
- Casual workers engaged for restoration and community activities
- Consultants, interns, and volunteers
- Contractors, service providers, and suppliers
- Community groups, youth groups, and farmer groups engaged in EarthLungs projects
- Any third parties acting on behalf of EarthLungs

3. What EarthLungs Considers Modern Slavery

EarthLungs defines modern slavery as any situation where a person is exploited and cannot leave due to threats, coercion, violence, deception, or abuse of power.

Modern slavery includes, but is not limited to:

- Forced labour (work obtained through threats or coercion)
- Human trafficking (recruitment/transport/harboursing of persons for exploitation)
- Child labour (work that is harmful, unsafe, or prevents schooling)
- Debt bondage (work demanded to repay a debt with unfair terms)
- Withholding wages or identity documents
- Excessive overtime or restriction of movement
- Recruitment fees or illegal deductions charged to workers
- Sexual exploitation or harassment linked to employment or work conditions

4. Our Commitments

EarthLungs commits to the following principles:

4.1 *Ethical Recruitment and Employment*

- Workers must be engaged voluntarily and knowingly.
- No worker shall be required to pay a recruitment fee to secure work.
- Employment terms must be communicated clearly, including pay rates, duration, and conditions.
- Workers must be free to end their engagement in line with lawful terms.

4.2 *Child Protection*

- EarthLungs prohibits child labour in all its projects and operations.
- We will not engage individuals below the legally permissible working age.
- Where EarthLungs works with communities, we shall promote safe community practices that protect children from exploitation.

4.3 *Fair Wages and Working Conditions*

- EarthLungs supports fair compensation aligned with legal requirements and ethical practice.
- We oppose wage withholding, unfair deductions, or forced overtime.
- We promote safe, respectful, and dignified work environments.

4.4 *Health, Safety, and Welfare*

- EarthLungs will provide safe work conditions and reasonable protective measures.
- Workers must not be exposed to avoidable hazards without training and equipment.
- All staff and contractors must adhere to EarthLungs safety protocols and reporting.

4.5 *Responsible Procurement and Supplier Standards*

EarthLungs will take reasonable steps to ensure that suppliers and contractors:

- Do not exploit workers or engage in trafficking
- Comply with labour laws and ethical standards
- Provide fair treatment and safe conditions
- Maintain transparent and traceable labour practices

5. Risk Areas EarthLungs Recognizes

EarthLungs acknowledges that modern slavery risks may arise in:

- Short-term labour during peak planting seasons
- Community-based work models
- Contractors and sub-contractors
- Supply chains involving cross-border purchasing and transport
- Informal labour markets where documentation may be weak
- Low-income settings where workers may be vulnerable to coercion

EarthLungs will pay special attention to these risk areas through enhanced oversight and monitoring.

6. Roles and Responsibilities

6.1 Leadership Responsibility

EarthLungs leadership is responsible for ensuring that modern slavery prevention is embedded in planning, decision-making, and operational governance.

6.2 Managers and Supervisors

All managers and supervisors must:

- Ensure recruitment and engagement is ethical
- Maintain proper worker lists, attendance, and payment accountability
- Raise red flags immediately if concerns arise

6.3 Procurement Team

Procurement shall:

- Apply supplier due diligence measures
- Include modern slavery compliance expectations in procurement processes
- Avoid engaging suppliers linked to unethical labour practices

6.4 Finance Team

Finance shall:

- Support transparent payment processes
- Ensure payments are made to verified recipients and legitimate groups
- Flag suspicious payment requests, duplicate IDs, or inconsistencies

6.5 All Staff

All EarthLungs staff have a responsibility to:

- Treat people with dignity and respect
- Speak up when abuse or exploitation is suspected
- Cooperate with investigations and corrective actions

7. Reporting and Whistleblowing

EarthLungs encourages reporting of any suspected or actual modern slavery concerns, including:

- Forced labour indicators
- Underage workers
- Withholding wages
- Threats or intimidation
- Unsafe and coercive working conditions
- Suspicious recruitment arrangements

Reports may be made through:

- Direct supervisor/line manager
- HR/People Operations
- Country leadership
- CEO's office (where necessary)

EarthLungs strictly prohibits retaliation against anyone who reports concerns in good faith.

8. Response and Corrective Action

Where modern slavery risks are identified, EarthLungs will:

- Take immediate steps to protect affected individuals
- Suspend, terminate, or disengage unethical contractors/suppliers where required
- Escalate cases through leadership and legal channels as appropriate
- Strengthen internal controls to prevent recurrence
- Document actions taken and outcomes

Serious violations may lead to:

- Disciplinary action against staff
- Contract termination
- Reporting to relevant authorities

9. Training and Awareness

EarthLungs will promote awareness of modern slavery risks through:

- Staff onboarding and induction training
- Training for procurement and field teams
- Partner and supplier communication where appropriate

10. Policy Review and Continuous Improvement

EarthLungs recognizes that managing modern slavery risk is an ongoing responsibility. We will:

- Review this policy periodically
- Improve internal processes based on lessons learned
- Strengthen supplier engagement and monitoring systems

11. Approval

This policy is approved by EarthLungs leadership and applies across all sites and operations.

Signed:



Name:

Victor Mwanga

Title:

Founder & CEO, EarthLungs Reforestation Foundation

Date:

2nd October 2023