

**Purpose**

The purpose of this Policy is to prevent the spread of human trafficking and promote compliance with applicable laws, policies, and sponsor requirements. This Anti-Trafficking Compliance Policy ("Policy") identifies the practices in which American University of Armenia ("AUA" or "University") may not engage.

**Scope**

This policy applies to all AUA employees (all Officers, Directors, Faculty, and Staff) and contractors (including consultants, vendors, suppliers, and subcontractors) of AUA.

**Policy Statement**

AUA recognizes the devastating mental and physical effects, trauma, and dehumanization caused by human trafficking and has a zero-tolerance stance on trafficking in persons and such related activities in any part of its organization or business relationships. AUA condemns all forms of human trafficking and complies with all applicable Armenian regulations, including the Republic of Armenia's Law on Identification and Assistance to Persons Subject to Trafficking and Exploitation in Human Beings, and US regulations regarding human trafficking, including Federal Acquisition Regulation's (FAR) 48 C.F.R. subpart 52.222-50.

Human trafficking includes forced, bonded (including debt bondage) or indentured labor, commercial sex, involuntary prison labor, slavery, or other forms of trafficking in persons for labor or services by means of threat, force, coercion, abduction or fraud for the purpose of involuntary servitude, peonage, debt bondage or slavery. It also includes sex trafficking in which a commercial sex act is induced by force, fraud or coercion, or in which the person induced to perform such act has not attained the lawful age of majority.

AUA employees and contractors are prohibited from engaging in any of the following activities:

- (i) engaging in trafficking in persons during the period of performance of a contract, externally-funded program and award with the University;
- (ii) using forced labor in the performance of a contract, externally-funded program and award for the University;
- (iii) using misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment, such as failing to disclose basic information in a format and language accessible to the worker, particularly for recruitment efforts outside Armenia, or making material misrepresentations regarding, the key terms and conditions of employment, including wages and fringe benefits (which must in any event meet the minimum wage of the country where the employment is conducted), the location of work, living conditions and housing (if employer provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- (iv) charging employees recruitment fees;
- (v) using recruiters that do not comply with local laws in the country where the recruiting takes place;
- (vi) destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- (vii) failing to comply with applicable law;
- (viii) procuring commercial sex acts during the period of performance of a contract, externally-funded grants, and award;
- (ix) providing or arranging housing that fails to meet host country housing and safety standards;
- (x) if required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing, in a language the employee understands, which includes (but is not limited to) details about the work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons; and
- (xi) for portions of contracts and subcontracts performed outside Armenia, failing to pay return transportation costs upon the end of employment, for an employee who is not a national of the country in which the work is taking place and who was brought into that country by AUA.

The University has taken the following actions as a part of our commitment to combating human trafficking:

- (i) Research integrity: AUA supports externally-funded projects through the Office of Sponsored Programs and Technology Transfer (OSP&TT), which provides support and information about navigating the research process at the University, using AUA facilities and applicable research compliance.
- (ii) Human subjects: AUA promotes the ethical and safe practices according to IRB standards when conducting research on human subjects.
- (iii) Third parties: AUA promotes anti-trafficking compliance by making this Policy publicly available to all third-party vendors and collaborators engaged in University business and by performing appropriate due diligence on the third parties with which it contracts and collaborates.
- (iv) Raising Ethical Concerns: AUA is committed to providing an education and work environment that is free from sexual misconduct. As such, AUA's [Sexual Misconduct](#), [Non-Discrimination](#), and [Equal Opportunity](#) policies are kept up-to-date to promote best practices in support of University's students and employees.

Reports of sexual misconduct, human trafficking or other conduct in violation of this policy may be reported to AUA's Legal Counsel ([lawyer@aua.am](mailto:lawyer@aua.am)), to [AUA Ethics and Grievance Committee](#).

[AUA Ethics and Grievance Committee](#) [ethics@aua.am](mailto:ethics@aua.am) or anonymously through the University's Whistleblower portal

(<https://secure.ethicspoint.com/domain/media/en/gui/33853/index.html>).

### **Compliance**

Failure to comply with this Policy or falsification of documentation will be dealt with in accordance with University policies and procedures, and may be grounds for disciplinary or corrective action, or other legal consequence, up to and including termination of employment. Suspected violations of law may be referred to law enforcement or an appropriate state agency, and may result in civil or criminal penalties.

### **Reporting Requirement**

If you suspect or have information about any violations or potential violations of this Policy, you should report it in accordance with the procedures set out in this Policy and the [AUA Ethics and Grievance Committee](#).

For questions and inquiries, please contact the AUA's Legal Counsel at [lawyer@aua.am](mailto:lawyer@aua.am).

### **Resources**

For more information please visit:

- US National Trafficking Resource Center: <https://humantraffickinghotline.org/>
- Anti-Trafficking Platform of Armenia: <https://antitrafficking.am>

### **Related Documents**

**Sexual Misconduct**

**Non-Discrimination**

**Equal Opportunity in Employment**

**Externally-Funded Grants and Programs**

**Purchasing of Goods and Services**