

## **Social Safeguards Policy**

Directors, officers, employees, contractors, consultants, interns, volunteers, grantees and providers of services under contract (including their employees and sub-grantees) and others who act on behalf of Turtle Survival Alliance Canada (“we/us”) are expected to adhere to high ethical standards of conduct in their work with and for us. These persons are subject to, and must comply with, this Social Safeguards Policy.

We will ensure that all staff, consultants, interns and volunteers have access to and know their responsibilities under this Policy. We provide training to these persons, including relevant local laws in the jurisdictions in which they work, in connection with the safeguards outlined herein. We will always consider the requirements of this Policy in designing, creating and undertaking our partnerships, programs and projects throughout the world, as well as in managing our employee workplaces in Canada. When we provide grants to researchers, organizations and others with whom we work or we enter into contracts for services with intermediaries, we will require them to work in accordance with this Policy unless they confirm that they have their own safeguarding policy which is at least equivalent to this Policy. This Policy supplements our Code of Ethics.

Key terms used herein are defined in the Glossary of Terms below.

### **Respect for Human Rights**

We recognize that our conservation efforts may have impacts on people’s access to lands and natural resources that they need for their livelihoods. We must take care to ensure that our actions are consistent with accepted human rights standards, with due regard for local laws and customs.

We acknowledge, respect, and defend the recognized rights of local people to the access, and use of, resources in areas of conservation importance as these rights are essential to the sustained conservation of biodiversity. We also recognize that we are responsible for the impacts of our work in these communities.

We honour internationally proclaimed human rights principles, obey human rights laws and respect the cultures, structures and customs of the communities and countries in which we choose to work. We conduct our work with due respect for traditional knowledge, genetic resources, and traditional cultural expressions. We require that those who are subject to this Policy will seek to ensure that we and they are not complicit in, and do not contribute to human rights abuses. We seek to ensure that our conservation work does not harm the vulnerable and

supports as much as possible the fulfilment of their rights in the context of conservation and natural resources use.

Where our programs or projects require us and those who work for or with us to engage with Indigenous Peoples, we ensure that these programs or projects respect Indigenous People's rights under applicable laws, including their rights to Free, Prior and Informed Consent. We use our best efforts to ensure that potential adverse impacts are avoided or adequately addressed through a participatory and consultative approach, and that Indigenous Peoples involved in a program or project design receive culturally appropriate benefits that are negotiated and agreed upon with the affected persons and/or communities.

We do not tolerate or participate in any activity that would involve the removal, alteration, or disturbance of any physical cultural resources.

We do not tolerate abuse or exploitation of children, vulnerable adults, or communities with whom we work.

### **Safeguarding of Children**

Persons subject to this Policy must not:

- Engage in sexual activity with a child. A mistaken belief regarding the age of a child is not a defence.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional, or psychological abuse or neglect.
- Engage in any commercially exploitative activities with children including Child Labour, trafficking, or child pornography.
- Use language, images, or behavior that is inappropriate, offensive, harassing, abusive, sexually provocative, demeaning, or culturally inappropriate around children.
- Invite or bring unaccompanied children into their home, except for the limited purpose of assisting children at immediate risk of injury or physical danger.
- Photograph or film a child without obtaining a parent's or guardian's informed consent on how it will be used, or in violation of applicable law or custom regarding the photographing or filming of children, including restrictions on reproducing personal images.
- Engage in unsupervised interactions with children. Wherever possible, Persons subject to this Policy must ensure that another adult is present when working in

proximity to children.

### **Safeguarding of Vulnerable Adults**

Persons subject to this Policy must not:

- Engage in any sexual relationships with vulnerable adults, due to the inherently unequal power dynamics of such relationships.
- Sexually abuse or exploit vulnerable adults.
- Subject a vulnerable adult to physical, emotional, or psychological abuse or neglect.

### **Protection from Sexual Exploitation and Abuse**

Persons subject to this Policy must not:

- Exchange money, employment, goods, or services for sexual activity, including any sexual favours or other forms of humiliating, degrading, or exploitative behavior. This covers any exchange for assistance provided to communities with whom we work.
- Support or take part in any form of sexual harassment, violence, exploitation or abuse, including trafficking of human beings.

### **Anti-trafficking and Forced Labour**

Persons subject to this Policy must not engage in, tolerate, condone or facilitate any form of human trafficking, Forced Labour, slavery or servitude.

Trafficking includes any act of recruiting, transporting, transferring, harboring or receiving a person by means of a threat or use of force, coercion, abduction, misleading or fraudulent recruitment practices, abuse of power or of a position of vulnerability or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Where we employ Persons, we pay wages to employees that meet applicable host-country legal requirements and standards of pay. We provide all legally required work documents, written in a language that the employee understands. We do not charge recruitment or placement fees to prospective employees. When we arrange for or provide employee housing, we comply with the host country's housing and safety standards.

## General

We and all persons subject to this Policy are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Policy.
- Report any good-faith complaint, charge, claim, or report of a suspected violation of this Policy by anyone subject to this Policy.

Anyone who has experienced, witnesses or suspects a violation of this Policy must report it as soon as possible by following the procedures laid out in our Whistleblower and Investigations Policy by following the procedure laid out therein. If any person believes that the conduct to be reported is criminal in nature in the jurisdiction where it occurs, that person should consider a dual report to local authorities.

A breach of this Policy by any person required to comply with it may result in disciplinary or remedial action by Turtle Survival Alliance Canada, including the termination of the employment of a person, if an officer or employee, or the suspension or repayment of funding or termination of the contract, grant or other arrangement with a contractor, consultant, grantee, intern, volunteer or provider of services. Violations by a director of Turtle Survival Alliance Canada may result in the removal of that director by the Board of Directors. Where appropriate, we will refer a situation to the relevant authorities for criminal prosecution.

## Safe Recruitment

We implement safe recruitment screening procedures when employing persons or engaging them in any capacity that would render them subject to this Policy, including conducting appropriate due diligence prior to engaging independent contractors or consultants, making grants or entering into contracts for services with persons or entities, or agreeing to accept interns or volunteers. Due diligence may include, but is not limited to, confirming the candidate's identity, obtaining verbal references, conducting interviews, and completing a background public records check, including criminal and sex offender database searches, where applicable and available.

## Glossary of Terms

**Child** means a human being under the age of 18 unless under applicable law, the age of a child is defined as being younger.

**Child Labour** has the meaning accorded to that term in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*, as amended from time to time.

**Emotional or psychological abuse** refers to injury to the psychological capacity or emotional stability of a person caused by acts, threats or coercive tactics.

**Exploitation** includes, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or servitude, slavery or practices similar to slavery, servitude, or the removal of organs.

**Forced Labour** has the meaning accorded to that term in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*, as amended from time to time.

**Indigenous Peoples** are identified in specific geographic areas by the presence, in varying degrees of:

- (a) Close attachment to ancestral and traditional or customary territories and the natural resources in them;
- (b) Customary social and political institutions;
- (c) Economic systems oriented to subsistence production;
- (d) An Indigenous language, often different from the predominant language; and
- (e) Self-identification and identification by others as members of a distinct cultural group.

**Neglect** refers to failure to provide for a person's basic needs within Turtle Survival Alliance Canada's activities that are responsible for the care of a vulnerable adult or a child in the absence of the child's parent or guardian.

**Physical abuse** refers to acts or failures to act resulting in injury, unnecessary or unjustified pain or suffering, harm or risk of harm to a person's health or welfare, or death.

**Physical cultural resources** are movable or immovable objects, sites, structures and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, sacred sites or other cultural significance.

**Sexual abuse** means any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

**Sexual exploitation** means any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, threatening or profiting monetarily, socially or politically from the sexual exploitation of another.

**Sexual harassment** has the meaning given to that term in our Code of Ethics.

**Vulnerable adult** means a person who is or may be in need of care by reason of cognitive or other disability, age or illness, or who is or may be unable to take care of himself or herself, or unable to protect himself or herself against significant abuse or exploitation.

Approved by the Board of Directors on August 7, 2025