

Anti-Slavery and Human Trafficking Policy

Nandi Adventures
Anti-Slavery and Human Trafficking Policy
Effective Date: 06 January 2025
Review Date: 05 January 2026

Introduction

Nandi Adventures Ltd is committed to conducting business with integrity, transparency, and respect for human rights.

As a Uganda-based tour operator, we recognize the risk of modern slavery and human trafficking in tourism supply chains, including accommodation providers, transport services, porters, and community-based experiences. We take a zero-tolerance approach to any form of slavery, servitude, forced or compulsory labour, or human trafficking in our operations and those of our partners.

1. Legal Framework

This policy aligns with:

- The *Prevention of Trafficking in Persons Act, 2009* (Uganda)
- International conventions including the UN Guiding Principles on Business and Human Rights and ILO standards

2. Scope and Responsibility

This policy applies to all Nandi Adventures employees, freelance guides, suppliers, agents, and third-party contractors. Responsibility for implementing this policy lies with the company's senior management, led by the Director of Operations. We also expect our suppliers and partners to adopt the same high standards.

3. Our Commitment

We will:

- Ensure all staff and freelance workers are employed voluntarily and paid fairly in line with Ugandan labour laws.
- Conduct due diligence on suppliers and service providers to assess their compliance with anti-slavery standards.

- Avoid working with any business that uses exploitative labour, including child labour or trafficking networks.
- Support initiatives that empower local communities and provide dignified employment in tourism.
- Ensure that all tips, porter wages, and guest contributions to local experiences reach the intended beneficiaries.
- Provide accessible reporting channels for concerns or suspected cases of exploitation.

4. Risk Areas in Our Supply Chain

Our greatest exposure to slavery and trafficking risks is in:

- **Accommodation and lodge workers**, particularly casual or seasonal staff.
- **Transportation services**, where informal labour is common.
- **Community-based tourism**, where vulnerable groups may be exploited through "cultural tourism" or coerced participation.
- **Child exploitation risks**, especially in situations involving orphanage visits, school tours, or unsupervised donations.

We do not offer tours that involve visits to orphanages or marginalized groups unless these are clearly community-owned, dignity-led, and approved by ethical tourism standards.

5. Due Diligence and Monitoring

We assess risks in our supply chain through:

- Annual reviews of key partners, accommodation providers, and subcontractors.
- Staff training on identifying signs of exploitation.
- Integration of anti-slavery clauses in partner and supplier agreements.
- Collaboration with local and international bodies promoting ethical tourism (e.g. UWA, Climate Friendly Travel, Travelife).

6. Reporting and Whistleblowing

We encourage all staff, clients, and suppliers to report any concerns related to modern slavery or unethical practices. Reports can be made confidentially via email to **wecare@nandiadventures.com** or directly to senior management. Every report is investigated and appropriate action taken.

7. Policy Review

This policy is reviewed annually and updated as needed to reflect changes in our operations, local context, or applicable legislation.

Document Reference: Uganda's Prevention of Trafficking in Persons Act, 2009 (PTIP Act)

Signed:

Vincent Mugaba

Director of Operations & Sustainability Coordinator

Nandi Adventures

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