



Flights to Freedom

*Human Trafficking Prevention Training
for the Aviation Industry*

Facilitator Instructions
for Group Training

TABLE OF CONTENTS

1. About the Training
2. Pre-Training Checklist
3. Deliver Flights to Freedom Training
4. Additional Resources

Thank you so much for facilitating BEST's Flights to Freedom training. For more information, please go to www.bestalliance.org. If you have questions about facilitating this group training, please email info@bestalliance.org.

ABOUT THE TRAINING

The Port of Seattle offers this training course, called *Flights to Freedom*, for the aviation industry. The Port of Seattle also has a training course for the maritime industry, called *Ports to Freedom*. Please make sure you have the facilitator instructions for the correct training course for your audience.

Group Training Course

You will deliver this course through BEST's Training Center. To access the course, follow the instructions below:

1. Go to [BEST's Training Center](http://www.best-training.org/register) at www.best-training.org/register.
2. Register with the Group Training Course enrollment code: **PORT-GROUP**
Record your username and password so that you can log in later.
3. Click "Submit." You will be directed to your My Courses page.
4. On your My Courses page, you will have access to these courses:
 - *Ports to Freedom – Group Course*
 - *Flights to Freedom – Group Course*
5. Click "View Course & Prepare" on the appropriate course.
6. Follow the Facilitator Guide (this document) to facilitate this training.
7. [Log in to your account](#) any time to access these courses.

Required Videos

The approximate length of this training is 55-60 minutes and varies depending on discussion. *Flights to Freedom* is divided into four video modules.

1. What is Human Trafficking?
2. Identifying Human Trafficking
3. Responding to Human Trafficking
4. Preventing Human Trafficking

Questionnaire

Before and after the training, participants will be asked to answer a questionnaire, which can be completed on paper or online through BEST's Training Center. Instructions are provided on the first slide of your presentation.

You will need to provide the following enrollment code for your training participants to access the online questionnaire: **PORT-FQ**

PRE-TRAINING CHECKLIST

Two weeks before the training:

- Request resource cards and folded indicator cards from the Talent Development team in Human Resources.
- Reserve a classroom with internet access, a projector, and a sound system to ensure the videos can be played and heard.

At least one day before the training:

- Complete BEST's *Flights to Freedom – Manager Course* through the Port's Learning Portal.
- Access the *Flights to Freedom – Group Course* in BEST's Training Center (see page 3).
- Review and test the group course before the training event.
- Bring a copy of the Facilitator Instructions (this document) to the training.
- Print the handout "Indicators of Human Trafficking" for each participant.
- Bring printed materials for each participant.
 - Indicators of Human Trafficking handout
 - Resource cards
 - Folded indicator cards
 - Paper questionnaire
- Arrange for a computer, projector, and audio for use in the classroom.

DELIVER FLIGHTS TO FREEDOM TRAINING

The following is a set of instructions and script to facilitate *Flights to Freedom* group training. The script is in regular font. Instructions are indented and in italics.

Slide: Welcome and Questionnaire Instructions

Note to Trainer: Adjust your computer screen as needed for viewing purposes.

Welcome, everyone. Before we get started today, please take a few minutes to complete the preliminary questions to the training. You can access the questionnaire on your device at the website written on the screen; the instructions are also available on your tables. You will need the enrollment code **PORT-FQ** to complete registration. After completing the preliminary questions, please keep that webpage open on your device so that at the end of the training you can return to the questionnaire and answer the remaining questions.

Most people find it easy to use their phones to connect to the webpage and answer the questions, and I would encourage you to complete the questions this way. But if you're having any technical difficulties, you can find a printed questionnaire at your table.

Participants must complete and submit the questionnaire to receive credit for taking this course.

Note to Trainer: Pause for a couple of minutes to allow participants to complete the preliminary questions.

Hello, I'm *[insert introduction of self]*.

Thank you so much for coming to today's human trafficking prevention training. Today, I'll be walking you through the human trafficking prevention training course developed by Businesses Ending Slavery and Trafficking, or BEST, in partnership with the Port of Seattle. BEST is a local nonprofit organization that specializes in developing human trafficking prevention training for employers and employees like ours who are on the frontlines of human trafficking.

As part of the Port of Seattle's commitment to equity, we developed this training with BEST to help assist victims of human trafficking in our region. We want to see our ports become hubs for human trafficking victims to escape exploitation and connect with local services. Our aim is not only that all our employees will take this training, but that the employees of our tenants will also take the training.

I want to thank you for being here and taking time to learn about this difficult topic. For some of you, it's an issue that you may already have some knowledge of and that may have affected you, whether directly or indirectly. For everyone, it can be an emotionally troubling topic.

As difficult as these conversations may be, the ultimate purpose of this training today is to empower you and your colleagues to make a positive impact in the lives of potential human trafficking victims. I hope that we'll walk away from this hour with a sense of hope and empowerment, even with the heavy topic.

If at any point, you want to step out of the room, please feel free to do so.

With that, let's start the training.

Video Slide: “What is human trafficking?”

Note to Trainer: Play the video by clicking on the slide. After the video is complete, go to the next slide.

Note to Trainer: This video should begin 10 minutes after the start of your session.

Question Slide: “What is human trafficking?”

- a. Transporting an undocumented person across a border
- b. A person smuggling someone across a border with falsified documentation
- c. Force, fraud, or coercion to compel a person into work or prostitution or involving a minor in prostitution

Note to Trainer: Give the audience time to read the slide and for each person to formulate an answer in their head. Ask the audience what the answer is. After discussion, say:

The correct answer is (C)—Using force, fraud, or coercion to compel a person into work or prostitution or involving a minor in prostitution.

Often people confuse human trafficking with human smuggling. How are the two different?

Note to Trainer: Allow the audience to answer. Answers include the following:

Human Smuggling	Human Trafficking
<i>Human smuggling is consensual.</i>	<i>Human trafficking involves <u>force</u>, <u>fraud</u>, <u>coercion</u>, or <u>underage prostitution</u>.</i>

<i>Human smuggling <u>always</u> involves movement across a border.</i>	<i>Human trafficking does not have to involve movement across a border—it happens once a person arrives and is forced or coerced into work.</i>
<i>Human smuggling involves undocumented people.</i>	<i>Human trafficking victims coming to the US often arrive with visas and documentation. The trafficker may allow legal documentation to run out once they arrive so that they have more control over the victim.</i>

Question Slide: “What are indicators of human trafficking?”

- a. Control
- b. Distress or Injury
- c. Confusion
- d. Sex Buying

Note to Trainer: Give the audience time to read the slide and for each person to formulate an answer in their head. Then ask the audience what the answer is. After discussion, say:

All the above are correct answers: Control, Distress or Injury, Confusion, and Sex Buying.

I have provided you with a handout that provides more depth on the indicators of trafficking. Please take a moment to look at this handout.

Note to Trainer: Show the participants the handout. If there is time, ask the participants if anyone has ever seen any of these indicators.

Question Slide: “Where might you see human trafficking in the course of your day-to-day work?”

- a. Corporate office
- b. Check-in
- c. Security lines
- d. Concessions
- e. Customs
- f. Baggage claim
- g. Ground transportation
- h. Hotel
- i. Other Port properties
- j. Property of a supplier or vendor

Note to Trainer: Give the audience time to read the slide and for each person to formulate an answer in their head. Answers may vary based on where you work within the airport. Discuss with participants.

Video Slide: “Identifying Human Trafficking”

Note to Trainer: Play the video. After the video is complete, go to the next slide.

Note to Trainer: This video should begin 20 minutes after the start of your session.

Question Slide: “In this story, what were some indicators of human trafficking?”

- a. Not allowed to make eye contact
- b. Not allowed to communicate with others
- c. Distress
- d. Fear
- e. Forced to work
- f. Moving to new locations based on promises that sound untrue or unusual
- g. Tricked or did not receive pay they were promised
- h. Injury
- i. Unusual power dynamic
- j. Religious affiliation

Note to Trainer: Give the audience time to read the slide and for each person to formulate an answer in their head. Then ask the audience which indicators were present. After discussion, say:

All the above are correct answers, except (j)—religious affiliation. When you look for indicators of human trafficking, observe behaviors that suggest control or abuse. Please remember that indicators should be based on behaviors, and not based on discriminatory factors like religious affiliation, gender, race, ethnicity, sexual orientation, or ability.

Video Slide: “Responding to Human Trafficking”

Note to Trainer: Play the video. After the video is complete, go to the next slide.

Note to Trainer: This video should begin 30 minutes after the start of your session.

Question Slide: “What indicators of human trafficking did April and her colleague notice?”

- a. Not communicating with others
- b. Not making eye contact
- c. Control
- d. Surveillance
- e. Race
- f. Sexual orientation

Note to Trainer: Give the audience time to read the slide and for each person to formulate an answer in their head. Then ask the audience which indicators were present.

The correct answers are (A), (B), (C), and (D).

(E) and (F)—race and sexual orientation—are incorrect. Human trafficking can happen to people from any gender, race, or sexual orientation. By noticing behavior-based indicators, April knew that something was wrong.

Question Slide: “April’s lead flight attendant discouraged April from responding to the incident. What did April do correctly?”

- a. She observed the situation discreetly.
- b. She noticed indicators that were behavior-based.
- c. She asked a colleague if she saw anything unusual.
- d. She did not confront the trafficker.
- e. She reported what she and her colleague saw through appropriate channels.

Note to Trainer: Give the audience time to read the slide and for each person to formulate an answer in their head. Then ask the audience what she did correctly.

All the above are correct answers. In this situation, the lead flight attendant was convinced that it was not trafficking because she pulled the trafficker aside to question him and the two women continued to deplane, so she thought that the victim was free to go. But the reality is that traffickers exert incredible control over their victims even when they are not present.

If you think you see human trafficking, it’s important to report it and let the experts assist the potential victim. But it’s also very important not to discriminate—there has been at least one case of flight attendants who intervened during the flight based on race, in which they separated a father from his son because they were of different races and so the flight attendants assumed the boy was being trafficked. The situation was traumatizing for the young boy and embarrassing for the company. It would have been far better to report their suspicions

to the authorities on the ground and allowed experts to assess the situation in a way that is trauma-informed—especially if children are involved.

So again, if you suspect a trafficker is present, let the proper authorities know what you've seen and let them assess what's going on.

Video Slide: “Preventing Human Trafficking”

Note to Trainer: Play the video. After the video is complete, go to the next slide.

Note to Trainer: This video should begin 42 minutes after the start of your session.

Now, let's talk about a few different scenarios and how you might respond.

Slide: Scenario #1

You suspect a colleague of soliciting sex online during the workday. What do you do?

- a. Report it to your manager
- b. Report it to human resources
- c. Report it to the Port of Seattle Confidential Reporting Line: 1-877-571-5237
- d. Call 911 immediately

Note to Trainer: Give the audience time to read this slide and discuss what to do. A, B, and/or C could be appropriate because it would not be considered an emergency unless you saw someone actively being harmed.

Slide: Scenario #2

You are visiting a supplier and you notice terrible labor conditions for the workers of your supplier. What do you do?

Note to Trainer: Give the audience time to read this slide and discuss what to do. Reporting to your manager, human resources, or the Confidential Reporting Line could be appropriate in this scenario.

Slide: Scenario #3

You are in the bathroom at the airport and you notice someone with bruises and cuts on their face. The person will not make eye contact with you. What do you do?

Note to Trainer: Give the audience time to read this slide and discuss what to do.

1. First ask, “Are you OK?”
2. If they want help, ask, “May I call 911 to come help you?”
3. If they want you to call 911, make the call.
 - Sometimes people don’t want you to call 911—they know that they might be in greater danger if the police get involved. So, let them make that choice. But always call 911 if a child is involved.
4. If they do not want you to call 911, you can:
 - Offer to call a hotline to access help for victims of violence or human trafficking (Search online for the National Human Trafficking Hotline to find the number: 1-888-373-7888)
 - Give them a card with the human trafficking hotline number
 - Let them know that they can always call the authorities at the Port of Seattle when they are safe to do so
5. After the incident, report it to your manager.

People who have been trafficked have experienced force and coercion. It is important that we don’t force or coerce adults into something, even if we think it is what’s best for them. If the person is an adult, it is important that we increase their individual agency and allow them to make their own decision.

Slide: Scenario #4

You are a manager and one of your team members reports a suspicion of human trafficking. What do you do?

Note to Trainer: Make sure to cover this question.

Managers have a responsibility in abiding by our Port Policies to report any illegal activity that is reported to them. Ask your staff member for as many details as possible. Document what they’ve told you. Then report it to your manager, HR, or the Confidential Reporting Line. Or in an emergency, call 911.

Slide: Thank You

This brings us to the end of the training. Before I ask you for any questions you might have, I’d like to ask you now to return to the questionnaire and complete the remaining questions. As a reminder, you must complete the questionnaire to receive a certificate of completion for this course.

Note to Trainer: Wait a couple of minutes for individuals to complete the questionnaire.

Note to Trainer: Select questions are asked before and after the training to measure whether the training has changed people's attitudes and beliefs.

Please feel free to continue working on your questions, but I'm happy to take any questions you might have at this point. *[Answer questions.]*

In closing, the vision of this training is that the Port of Seattle becomes a hub for victims of human trafficking to get connected with services that can help them escape exploitation.

To accomplish this vision, the Port has a goal to get as many of our tenants trained as possible. You are among the most powerful people to help our tenants get trained. If you have good relationships with any of our tenants, please give them one of the folded indicator cards, so they can learn how to access the free training. Please ask them to get themselves and their teams trained.

Thank you again for your time today—you never know when you or someone you influenced might become an April, who recognized and reported trafficking so that a victim could go free. You play such a vital role to promote equity here at the Port by helping our most vulnerable travelers and workers. Thank you!

Note to Trainer: Collect the paper questionnaires and mail them to BEST's office at:

*Businesses Ending Slavery and Trafficking
1201 1st Ave S, Suite 321
Seattle, WA 98134*

ADDITIONAL RESOURCES

The following resources are available in the *Flights to Freedom* training course. Please share with training participants as appropriate.

1. **Port of Seattle Code of Conduct**
2. **Web Resources**
 - a. www.watraffickinghelp.org
 - b. www.stopbuying.me
3. **Federal Human Trafficking Laws:** This document lists relevant federal human trafficking laws.
4. **Indicators of Human Trafficking:** This document provides an extensive list of indicators, which managers can use to assess whether a situation might be human trafficking.

The following resources are available to learn more about the issue of human trafficking. Please review and share with training participants as appropriate.

1. **Faces of Human Trafficking**
Online video series: <https://ovc.ncjrs.gov/humantrafficking/publicawareness.html>
2. **The Life Story**
Online video series: <https://www.thelifestory.org/>
3. **King County CSEC Task Force**
Register for free, in-person training events: <https://www.kingcountycsec.org/>

This training course provides a generalized introduction to human trafficking. Human trafficking laws and requirements vary by region. Please consult an attorney for legal advice.

PORT OF SEATTLE CODE OF CONDUCT

Relevant portions of the Port of Seattle's Code of Conduct are attached as an exhibit. This document was up to date as of January 28, 2020.

EMPLOYEE ETHICS AND CONFLICT OF INTEREST

Serving the Port Loyally

CC-1 as of 1/1/10

I. The Port's Interests Come First

Port of Seattle employees are expected to serve the Port with the highest standards of ethical conduct and to avoid situations that create a real or perceived "conflict of interest." A "conflict of interest" exists when an employee's duty to give undivided loyalty to the Port is influenced, or could be influenced, by personal interest. The fact of a conflict of interest is not in itself a violation of the policy. Instead, it is something that should be reported (see Section IV) so the Port may ensure that decisions are not made that could be influenced by the conflict of interest, or perceived to have been influenced by it.

Port employees must ensure that any outside activity or personal interest is kept separate from their position at the Port and does not influence their business judgment on the Port's behalf. Port employees need to use common sense and keep the interests of the Port paramount at all times. In addition to avoiding actual conflicts of interests, Port employees should avoid situations that could *appear* to be a conflict of interest.

Ethical issues and conflicts of interest are not always obvious or clear. It is far better to raise issues in advance and get guidance than to make the wrong judgment call. **Thus, when in doubt, please review the situation with the Workplace Responsibility Officer.**

This policy is intended to

- Guide employees so that they consistently conduct Port business without being influenced by considerations of personal advantage or gain
- Help employees identify potential ethical concerns and conflicts of interest
- Require employees to disclose potential conflicts of interest; and
- Require employees to report potential policy violations

No policy can adequately substitute for personal honesty, common sense and good judgment. At a minimum, Port employees are expected to apply these attributes to their daily job-related activities. Port employees are expected to conserve and responsibly use the resources the public has entrusted to the Port, to act in accordance with applicable laws, and to conduct all Port business in a manner that will reflect positively on the Port, its employees and the community.

II. Real or Perceived Conflicts of Interest

Port employees must avoid real, or perceived, conflicts of interest between their private activities and their duties and responsibilities as employees. At a minimum, potential conflicts should be reported so that the Port may consider what, if any, actions should be taken to ensure that decisions are not influenced (or perceived to be influenced) by personal interests.

The following are examples of situations in which an employee may feel conflicting loyalties between what is in the best interest of the Port and what may be in the best interest of the employee. For purposes of this policy, "Relative" is defined to include an employee's spouse, domestic partner, parents, children, cousins, nieces, nephews, grandparents, grandchildren, in-laws, and any person with whom the employee has a relationship that is substantially equivalent to any of the above.

A. Conflicts from Business Relationships

A conflict of interest may exist when an employee, an employee's Relative, or someone with whom an employee has a significant personal relationship, directly or indirectly, has a Financial or Beneficial Interest in, or operates, an organization that competes with the Port, is doing business with the Port, or plans to do business with the Port. Employees should, therefore, avoid owning interests in or operating companies that compete with the Port, or that sell (or plan to sell) products or services to the Port, other than minimal amounts of stock in publicly-traded companies.

The Port's policy is to award business solely on merit, without favoritism, by

Employee Ethics & Conflict of Interest

securing the best product or service available at the best price. Therefore, an employee must disclose to the Workplace Responsibility Officer the existence of any Financial or Beneficial Interest which, because of its existing or potential relationship to the Port, could create a present or future conflict of interest. An employee shall be presumed to have knowledge of any Financial or Beneficial Interest held by a Relative.

For purposes of this policy, "Financial or Beneficial Interest" is defined to include:

(a) a creditor, debtor or ownership interest in an amount or value in excess of \$1,500; (b) any employee, consultant or partnership arrangement; or (c) any option to purchase real or personal property.

No employee shall have a Financial or Beneficial Interest, direct or indirect, in any contract that may be made by, through or under the supervision of the employee, or for the benefit of the Port. No employee shall accept, directly or indirectly, any compensation, gratuity or reward in connection with such contract from any other person beneficially interested therein.

An employee shall not participate in any decision-making, review, approval, selection, authorization or supervisory activity concerning any contract or Port transaction in which he/she or his/her Relative has a Financial or Beneficial Interest.

B. Conflicts from Outside Employment

Working with any organization that has a business relationship with the Port, or seeks to have one, results in a conflict of interest if that business receives, or may receive, more favorable treatment as a result of the employee's relationship with the business. As a result, working for those with whom the Port has a business relationship is prohibited unless expressly approved in writing by the Workplace Responsibility Officer.

Even if outside employment is with an organization that does not have a business relationship with the Port, conflicts of time and energy may arise. Accordingly, salaried, exempt employees must obtain prior written approval from his or her

Department Head before holding a job with another organization. If such approval is granted, the employee acknowledges that satisfactory job performance with the Port must be maintained and that no conflict of interest can exist.

All employees with other jobs will continue to be judged by the same performance standards and will be subject to the Port's scheduling demands, regardless of any existing outside work requirements. If the Port determines that an employee's outside work interferes with performance or the ability to meet the Port's changing requirements, employees may be asked to terminate outside employment in order to continue employment with the Port.

C. Improper Compensation

No employee may, directly or indirectly, ask for or give or receive or agree to receive any compensation, gift, reward or gratuity from a source for performing or omitting or deferring the performance of any official duty, unless otherwise authorized by law. See also Gifts and Hospitality Policy.

III. Use of Position for Personal Benefit

One particular type of conflict of interest arises when an employee is in a position to exploit his or her role with the Port to advance his or her personal interest. A conflict of interest also arises when an employee may have competing loyalties between his or her personal interests and the Port's business. Employees must avoid circumstances in which it appears, or to a reasonable person might appear, that the employee is requesting or otherwise seeking special consideration, treatment or advantage because of the employee's position with the Port.

A. Obtaining Special Privileges

Port employees shall not use their employment position to secure special privileges or exemptions for themselves or a Relative. This includes obtaining any information, item or service from Port customers, suppliers, contractors, consultants, or lessees (or potential customers, suppliers, contractors, consultants, or lessees) or other Port employees. It also includes an employee

using his position at the Port to help a Relative get a job offer from the Port or to obtain a job offer from a Port vendor.

B. Use of Port Equipment

Employees are expected to use Port-owned property and equipment for official Port business. An employee shall not take or use Port-owned property and equipment for personal purposes, convenience or profit. This includes taking or using fleet vehicles, shop tools, fax machines, copiers, postage, office supplies, cameras, cell phones and laptops.

It is not a violation of this policy for an employee to (i) engage in the incidental personal use of such property or equipment (such as sending/receiving personal e-mails while using a Port-owned laptop) while at the workplace, or (ii) engage in other incidental uses of such property or equipment that may be specifically permitted by a CEO's adopted policy (such as an employee's use of a Port assigned cell phone to make a long distance call to a family member while traveling on Port business, in accordance with Procedure AC-2) or CEO written authorization. See also Electronic Systems Policy.

C. Safeguarding Confidential Information

An employee shall not disclose "Confidential Information" to third parties. "Confidential Information" includes, without limitation, any information in whatever form that the Port considers to be confidential, proprietary information and that is not publicly or generally available relating to: trade secrets (as defined by the Uniform Trade Secrets Act); matters discussed during Executive Sessions; requests for proposals; proposed or pending real estate transactions; personnel matters; all matters not subject to public disclosure; attorney-client privileged communications and attorney work product; research and development; product, content and technology development plans; marketing; databases; inventions; research data and mechanisms; procedures; engineering; purchasing; accounting; sales; customers; advertisers; investors; suppliers; financial status; contracts or employees.

The Port's definition of Confidential Information for purposes of an employee's requirements under this policy covers more information than may fall within the public records disclosure rules. While the Port is committed to transparency as a public agency, it also is respectful of employees and wants to foster an environment in which opinions may be aired without fear of publicity. It also needs to be able to formulate business strategy internally and make decisions about when such discussion is ready for more public debate. Thus, if you have a question about whether information is confidential, please consult with the Workplace Responsibility Officer before communicating it externally.

An employee shall not use Confidential Information in any manner that is detrimental to the Port. This restriction applies regardless of whether the use or disclosure of Confidential Information results in any benefit to the employee or the employee's Relative.

An employee shall not use Confidential Information for the benefit of the employee or employee's Relative. An employee shall not accept secondary employment or engage in business or professional activities that the employee might reasonably expect would require or induce him/her to disclose Confidential Information.

IV. Duty to Report Conflicts of Interest

Employees must report to the Workplace Responsibility Officer all potential situations that could present a real or perceived conflict of interest, including Financial or Beneficial interests held by the employee in entities doing business with the Port. The fact of a conflict of interest is not, in and of itself, a policy violation. Rather, it is the failure to disclose a real or potential conflict of interest, and/or taking action on behalf of the Port when there is a real or perceived conflict of interest that is of concern to the Port.

After an employee discloses a real or potential conflict of interest, the Workplace Responsibility Officer will document the disclosure and determine any steps that should be taken to avoid the employee's participation in any decision. Employees also should report all potential conflicts of interest, financial or

otherwise, of *another* employee who is in a position to influence the selection, non-selection, or conduct of business between the Port and any entity.

In an effort to assist employees in identifying and disclosing potential conflicts of interest, the Port will periodically ask employees to complete a “Statement of Financial or Beneficial Interests” and disclose information that may relate to an actual or perceived conflict of interest.

V. Reporting Concerns or Violations

All employees have a responsibility for ensuring that this policy is followed. Concerns and potential violations should be reported to the Workplace Responsibility Officer, or anyone identified in the “Reporting Concerns or Violations” policy. Supervisors and managers will be held to a higher level of responsibility with respect to reporting potential violations. Supervisors and managers who know of or receive reports of potential violations *must* promptly report them to the Workplace Responsibility Officer. Employees will not be retaliated against for reporting in good faith concerns or potential violations of this policy. See “Reporting Concerns or Violations” policy for more detail.

For further information, please contact the Workplace Responsibility Officer.

EQUAL OPPORTUNITY

Ensuring Non-Discrimination and Reasonable Accommodation CC-9 as of 1/1/10

I. The Port's Commitment to Equal Employment Opportunity

The Port of Seattle is an equal employment opportunity employer. The Port embraces, and in fact relies on, having a diverse workforce. Every employee has the right to work in surroundings that are free from all forms of unlawful employment discrimination. The Port will not engage in, or tolerate, any discrimination in the workplace prohibited by local, state or federal law.

Specifically, no employee will be discriminated against on the basis of his or her age, race, color, national origin/ancestry, religion, disability, Family Medical Leave Act (FMLA) use, pregnancy, sex/gender, sexual orientation, whistleblower status, marital status, military status, use of workers' compensation, transgender status, political beliefs, or any other category protected by applicable federal, state or local law ("Protected Status").

II. Reasonable Accommodation of Disabilities and Religion

The Port recognizes that employees with physical or mental disabilities may need reasonable accommodations to enable them to perform their essential job functions. The need for accommodations is determined on a case by case basis. Generally the Port and the employee will work together in an interactive process to identify possible accommodations. The employee has an obligation to cooperate with the Port in this process, which may include authorizing the Port to communicate with the employee's health care providers concerning the employee's condition, its impact on the employee's ability to perform job functions, and possible reasonable accommodations. Please see the Port's Disability Management policy for more information.

The Port also generally will offer reasonable accommodation for an employee's sincerely held religious belief that conflicts with a workplace rule, unless doing so would create an undue hardship.

Employees who want to request accommodation of a disability or religious belief should contact the Director of Human Resources and Development. The Port will evaluate requests consistent with current legal requirements.

III. Commitment to Inclusion

The Port expects its employees to embrace a higher standard of non-discrimination and inclusion than simply not discriminating and harassing others based on Protected Status. It expects all employees to be tolerant and accepting of our individual differences, to avoid stereotyping others with whom we interact both at the Port and in the broader community based on protected characteristics and to treat others with respect. Disrespectful treatment by Port employees of our customers or members of the public is not consistent with the Port's values and will not be condoned.

IV. Reporting Concerns or Violations

All employees have a responsibility for ensuring that this policy is followed. Concerns or potential violations should be reported to the Director of Human Resources and Development, or anyone identified in the "Reporting Concerns or Violations" policy, even if the alleged improper conduct happened to someone else. Supervisors and managers will be held to a higher level of responsibility with respect to reporting potential violations. Supervisors and managers who know of or receive reports of potential violations *must* promptly report them to the Director of Human Resources and Development. Employees will not be retaliated against for reporting in good faith potential violations of this policy. See "Reporting Concerns or Violations" policy for more detail.

For further information, please contact the Director of Human Resources and Development.

REPORTING CONCERNS OR VIOLATIONS

Ensuring Compliance with Workplace Responsibility Policies CC-14 as of 1/1/10

I. Each Employee's Role In Compliance

The Port of Seattle is committed to reviewing concerns and investigating potential violations of its Workplace Responsibility policies, as well as concerns that the Port has engaged in improper governmental activity.

Port employees should report, without fear of retaliation, any matter which they believe could constitute a violation of the Port's Workplace Responsibility policies or other improper governmental activity. This policy outlines the steps that the Port generally will take to review and investigate concerns and complaints. This policy also sets forth the Port's commitment to ensuring that employees who make reports in good faith, or who participate in investigations, do not experience retaliation. This protection extends to employees who report concerns of alleged improper governmental activity, commonly referred to as "whistleblowers."

Workplace Responsibility/Code of Conduct Policies:

- Employee Ethics and Conflicts of Interest
- Consultant Ethics and Conflicts of Interest
- Former Employee Ethics and Conflicts of Interest
- Gifts and Hospitality
- Fraud Awareness and Prevention
- Loss Prevention
- Electronic Systems
- Anti-Harassment
- Equal Opportunity
- Violence in the Workplace
- Substance Abuse
- Employment of Relatives
- Political Activities

II. Expectations of Supervisors and Managers

All employees have a responsibility for ensuring that each of the Workplace Responsibility/Code of Conduct policies is followed. Supervisors and managers will be held to a higher level of responsibility with respect to reporting potential violations of the policies described above. Supervisors and managers who know of or receive reports or complaints of offending behavior *must* promptly report.

III. How to Report

To report a concern or potential violation employees should contact any one of the following:

- Workplace Responsibility Officer
- General Counsel
- Director of Human Resources and Development
- Ethics & Compliance Hotline: **1-877-571-5237, 24 hours a day, 7 days a week**

An employee who reports his/her own improper action does not automatically receive immunity from disciplinary action. However, the fact that an employee voluntarily reports his or her own possible policy violations may be favorably considered when evaluating disciplinary action.

IV. Confidentiality

Except as necessary to facilitate a thorough investigation, any person within the Port receiving information about a concern or potential violation of a Workplace Responsibility policy shall keep all information received as confidential as possible. This includes the names of the persons involved and the nature of the concerns or violations.

V. No Retaliation

No retaliatory action will be taken against any employee who in good faith reports a concern or potential violation of a Workplace Responsibility policy, or

who assists in the investigation of one. The Port's commitment to non-retaliation includes protection of those employees who report complaints of alleged improper governmental activity, commonly referred to as "whistleblowers."

Employees are prohibited from using their official authority or position to prevent or interfere with an employee reporting violations of Workplace Responsibility policies.

Employees who believe they have been retaliated against for having made a complaint or participated in an investigation must promptly notify any one of the resources listed in Section III of this policy so that such concerns can be investigated. Appropriate corrective measures will be taken if allegations of retaliation are substantiated.

VI. The Investigation Process

The Port will promptly and thoroughly review all reported concerns and alleged violations of its Workplace Responsibility policies. Reports will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. Generally this means that details are shared only with those who have a need to know so that the Port can conduct an effective investigation.

There may be a preliminary investigation to determine whether the concern or allegation constitutes a potential policy violation, as a rational and legitimate explanation may exist for the reported activity. If a full investigation is deemed appropriate, decisions will be made about whether to conduct internally or by retaining an outside investigator. The Port will conduct the investigation as swiftly as feasible.

The reporting employee typically will be requested to provide relevant details, such as the date(s), location(s), name(s) of witnesses, or information about the alleged improper actor(s)/action(s). Other persons with relevant information may be interviewed as needed. During the investigation, steps may be taken, when appropriate, to minimize contact between the reporting employee and the alleged

Reporting Concerns or Violations

improper actor. In the case of harassment allegations, changes may include schedule changes, temporary transfers or investigatory leave, usually for the alleged harasser.

After the investigation is completed, the Port generally will discuss its findings with the reporting employee, the alleged improper actor, and possibly others directly concerned with the matter.

If the Port concludes that a policy violation occurred, prompt and effective remedial action will be taken. This may include discipline of the improper actor(s) and other actions to remedy the effects of the violation and to prevent further violations.

The Port also will be responsible for fulfilling other statutory reporting requirements that may be necessary, including those required by the Washington State Auditor's Office.

For further information, please contact the Workplace Responsibility Officer.

FRAUD AWARENESS & PREVENTION

Promoting Trust and Vigilance

CC-5 as of 1/1/10

I. Statement of the Policy

The Port of Seattle serves the public. Every Port employee has a responsibility to earn and maintain the public's trust by using taxpayer resources wisely and preventing loss and fraud. The Port is committed to having a work atmosphere of fraud awareness, where its employees, interns and volunteers, are skilled to identify potential fraudulent activity and are supported when carrying out their responsibility to immediately report such activity. Every employee is expected to follow this policy and to immediately report known or suspected loss of public funds or assets or "Fraud."

Fraud is a unique and particularly insidious form of dishonesty that is being called out separately from the Port's related Loss Prevention Policy (EX 18), to emphasize the seriousness of such acts. For purposes of this policy, the Port defines "Fraud" broadly. It includes any act of deception that is, or could reasonably be expected to, result in personal gain. It includes any situation in which Port resources are diverted to an employee, or the employee's Relative, friends, or associates, without authorization, which may also include misappropriation. Fraud may exist whether there is actual harm to the Port or not.

The Port of Seattle has zero tolerance for Fraud. "Zero tolerance" means that complaints of violations of this policy will be reviewed and any violations will be addressed. The manner in which violations are addressed will depend on the circumstances. Employees could be subject to progressive discipline up to and including immediate termination. Employees must report suspected violations of this policy. See "Reporting Complaints" policy for more detail.

"Relative" is defined to include an employee or a consultant's spouse, domestic partner, parents, children, cousins, nieces, nephews, grandparents, grandchildren, in-laws, and any person with whom the employee or consultant has a relationship that is substantially equivalent to any of these.

II. Specific Purposes of this Policy

- To ensure proper stewardship over public funds and assets, and provide timely and proper handling of any known or suspected fraudulent activity

- To comply with RCW 43.09.185, that requires State agencies and local governments to immediately report any known or suspected loss of public funds or assets to the State Auditor's Office (SAO)
- To establish clear expectations and ensure consistent and timely action by the Port
- To ensure that losses are minimized; investigations and audits are not hampered; and bond claims are not jeopardized

III. What and How to Report

Employees must report any irregularity that reasonably leads a Port employee to suspect Fraud—regardless of amount or type. Early and vigilant reporting will allow the Port to minimize losses by addressing matters before they become larger issues. The reporting requirement also includes issues that have occurred in the past but have only recently become apparent. When in doubt, report. Employees also should report suspicions of Fraud even if the matter has been referred to law enforcement. Any Port employee who becomes aware of or suspects Fraud shall immediately report this to the Ethics and Compliance Hotline, the Port's General Counsel, or the Workplace Responsibility Officer—even if it is also separately referred to the Port Police. Employees will not be retaliated against for reporting concerns or complaints of suspected Fraud. See "Reporting Concerns or Violations" policy.

IV. Investigation Process

A. Commitment to Review and Investigate

The Port will review and investigate concerns or complaints of Fraud, as outlined in the Port's Reporting Concerns or Violations policy. Employees are expected to fully cooperate with, and avoid any actions that may impede an audit or investigation.

B. Fraud Response Committee

The following is additional information about the investigation process and the Port's Fraud Response Committee. The Port will generally follow the process outlined below. However, the Port reserves the right to take an approach that best suits the particular situation and may not follow every step outlined below in all cases.

- The Port's Fraud Response Committee is comprised of the Deputy CEO, General Counsel, Chief Financial Officer and the Accounting and Financial Reporting Director. If any member of the Committee has or reasonably believes they may have a conflict with any matter, they shall immediately recuse themselves from any further participation in that matter.
- The General Counsel or Workplace Responsibility Officer will respond to reports of suspected fraud received through the Ethics and Compliance Hotline, and will forward such reports to the

Port Police. The Port Police will forward all reports of suspected fraud brought to their direct attention to the General Counsel and Senior Internal Audit Manager.

- Following receipt of a report of Fraud, the General Counsel shall advise the Commission President and Chief Executive Officer. In concert with the Port Police and the Senior Internal Audit Manager, the General Counsel shall make preliminary inquiries and review relevant documents for the purpose of determining whether cause exists to pursue the matter further, either as an employment matter or as a civil matter to recover funds or assets. The General Counsel also may submit requests for additional information through the Ethics and Compliance Hotline process as necessary. The General Counsel then will draft a written recommendation that the matter be pursued further or that the matter should be closed for lack of substantiation. The General Counsel may not interfere with any police investigation or any decision by the Port Police to refer a matter for prosecution.
- The General Counsel shall forward his or her recommendation to the Commission President, the Chief Executive Officer and members of the Fraud Response Committee. If the General Counsel recommends closing the matter, the Commission President, the Chief Executive Officer, or any member of the Fraud Response Committee may request further review and the matter will be forwarded to the Fraud Response Committee.
- If the Fraud Response Committee determines that further action is necessary, the Committee will determine the appropriate next steps including establishing the scope of the inquiry and determining whether in-house resources or outside consultants should be used to conduct the review.
- The Senior Internal Audit Manager, or retained consultant as determined by the General Counsel or by the Fraud Response Committee, shall conduct an investigation to gather the facts, determine the nature of the irregularity, and inform the General Counsel and/or Fraud Response Committee.
- At the point it is suspected or known that a Fraud has occurred, the Senior Internal Audit Manager shall immediately notify the SAO in accordance with RCW 43.09.185.
- The General Counsel or the Fraud Response Committee shall recommend the appropriate next steps for disciplinary action and recovery of funds or assets, based on the Senior Internal Audit Manager's or retained consultant's assessment and recommendations. Any recommended actions shall be implemented pursuant to applicable Port policies and procedures. Any such recommendations shall be coordinated with any ongoing criminal investigation.
- The Senior Internal Audit Manager shall notify the Risk Manager of all known and suspected instances of fraudulent activity. The Risk Manager, in coordination with General Counsel, shall determine whether to file a claim against the Port's employee dishonesty insurance policy, considering the circumstances.
- Any Port employee in possession of or responsible for relevant financial, operational and all other records shall protect them from loss or destruction, and all original records related to the loss shall be secured in a safe place until a full audit/investigation has been completed.

For further information, please contact the Workplace Responsibility Officer.