

Modern Slavery and Human Trafficking Policy

1. Introduction

Masters' Union is committed to preventing modern slavery and human trafficking in all its forms within its operations and supply chains.

This policy sets out the principles, responsibilities, and processes adopted to ensure compliance with applicable Indian laws and to uphold ethical standards across all institutional activities.

2. Policy Statement

Masters' Union adopts a zero-tolerance approach to modern slavery and human trafficking.

The institution is committed to acting with integrity, maintaining transparency in its operations, and implementing appropriate systems and controls to prevent any form of exploitation.

Masters' Union complies with all applicable Indian labour and anti-trafficking laws and expects the same standards from all individuals and organisations working with or on its behalf.

3. Scope

This policy applies to all persons working for or on behalf of Masters' Union, including employees, faculty, contractors, consultants, interns, and third-party representatives.

It also applies to all suppliers, vendors, service providers, and institutional partners.

The policy extends across all operational activities and all tiers of the supply chain.



4. Legal and Regulatory Framework

This policy is aligned with applicable laws in India, including:

- Bonded Labour System (Abolition) Act, 1976
- Child Labour (Prohibition and Regulation) Act, 1986 (as amended in 2016)
- Indian Penal Code (including provisions relating to trafficking and forced labour)
- Code on Wages, 2019
- Occupational Safety, Health and Working Conditions Code, 2020

This policy is also informed by international standards, including those of the International Labour Organization and the United Nations Guiding Principles on Business and Human Rights.

Where applicable, Masters' Union will comply with any additional legal or regulatory requirements relevant to its operations.

5. Risk Assessment

Masters' Union recognises that risks of modern slavery may arise in areas where labour is outsourced, subcontracted, or less visible.

Higher-risk areas may include facilities management, event operations, temporary staffing, and third-party service providers.

The institution adopts a risk-based approach to identify, assess, and prioritise such risks.

6. Due Diligence

Masters' Union undertakes proportionate due diligence in relation to suppliers and partners to mitigate modern slavery risks.

This includes assessment at the onboarding stage, requiring compliance declarations, evaluating risk based on the nature of services and geography, and taking appropriate action where concerns are identified.



7. Supplier Standards

Masters' Union expects all suppliers and partners to comply with applicable laws and uphold ethical labour practices.

Suppliers are expected to ensure that:

- Forced, bonded, or involuntary labour is not used
- Child labour is not employed in violation of applicable laws
- Employees are provided fair wages and lawful working conditions
- Employment practices are transparent and compliant

Failure to meet these standards may result in review or termination of the business relationship.

8. Procurement Controls

Modern slavery considerations are integrated into procurement and vendor management processes at Masters' Union.

Contracts with suppliers include provisions relating to compliance with applicable labour and anti-slavery laws. Procurement teams are responsible for ensuring that these requirements are applied consistently.

9. Responsibilities

Responsibility for the implementation and oversight of this policy is shared across Masters' Union as follows:

9.1 Senior Management

Senior Management is responsible for approving this policy, ensuring appropriate oversight, and reinforcing a zero-tolerance approach to modern slavery.

9.2 Finance and Procurement Functions

Finance and Procurement teams are responsible for integrating modern slavery considerations into procurement processes, conducting supplier due diligence, embedding contractual safeguards, and monitoring supplier compliance.





9.3 Operations and Administrative Functions

Operations and administrative teams are responsible for ensuring that third-party engagements comply with this policy and for identifying and escalating potential risks in day-to-day activities.

9.4 Employees and Representatives

All employees, faculty, and representatives are required to comply with this policy, remain vigilant to indicators of modern slavery, and report concerns through appropriate channels.

9.5 Suppliers and Partners

Suppliers, vendors, and partners are expected to comply with applicable laws, adhere to this policy, and cooperate with any due diligence or audit processes.

10. Reporting and Whistleblowing

Concerns related to modern slavery or human trafficking may be reported through designated internal channels, including HR or compliance teams.

All reports will be treated confidentially and investigated appropriately. Masters' Union will not tolerate retaliation against individuals who raise concerns in good faith.

11. Training and Awareness

Masters' Union will provide appropriate training and guidance to relevant employees, particularly those involved in procurement and supplier engagement, to support the identification and prevention of modern slavery risks.

12. Monitoring and Effectiveness

Masters' Union will monitor the effectiveness of this policy through periodic reviews of supplier practices, internal controls, and reported concerns.

Appropriate improvements will be implemented where required.

This policy will be reviewed periodically and updated as necessary to reflect changes in legal requirements and institutional practices.

