masters' union university

Modern Slavery and Human Trafficking Policy

Title of the Policy	**Modern Slavery and Human Trafficking Policy**
Created on	**17-Sep-2023**
Last reviewed on	**15-Sep-2025**

1. Introduction

Masters' Union is committed to preventing forced labour, modern slavery, human trafficking and child labour in its own operations and throughout its supply chains. This policy sets out the principles, responsibilities and processes that apply across all institutional activities.

2. Policy Statement

Masters' Union has zero tolerance for modern slavery in any form. Specifically, it:

- does not use forced, bonded or involuntary labour
- does not engage in or support human trafficking
- does not use child labour in any form

Masters' Union acts with integrity and transparency and maintains controls to prevent exploitation. It requires the same standards of everyone who works with it or for it.

3. Scope

This policy applies to everyone working for or on behalf of Masters' Union: employees, faculty, contractors, consultants, interns and third-party representatives. It also applies to all suppliers, vendors, service providers and institutional partners, across all operations and every tier of the supply chain.

4. Legal and Regulatory Framework

This policy complies with:

- the Bonded Labour System (Abolition) Act, 1976
- the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 (as amended in 2016)
- the Bharatiya Nyaya Sanhita, 2023 (provisions on trafficking and forced labour)
- the Code on Wages, 2019
- the Occupational Safety, Health and Working Conditions Code, 2020

It is also informed by International Labour Organization standards and the UN Guiding Principles on Business and Human Rights.

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5. Risk Assessment

Masters' Union identifies higher-risk areas as those where labour is outsourced, subcontracted or less visible: facilities management, event operations, temporary staffing and third-party services. Risks in these areas are assessed and prioritised before any engagement begins.

6. Due Diligence

All suppliers and partners go through due diligence, including:

- a risk assessment at onboarding
- a signed declaration of compliance with this policy
- an evaluation of risk based on the type of service and its location
- immediate investigation when a concern is raised

7. Supplier Standards

Suppliers and partners are required to:

- use no forced, bonded or involuntary labour
- use no child labour in any form
- pay fair wages and provide lawful working conditions
- maintain transparent and compliant employment practices

A breach of these standards will result in corrective action or termination of the relationship.

8. Procurement Controls

Every supplier contract includes clauses requiring compliance with labour and anti-slavery laws and with this policy. The procurement team applies these clauses to every engagement.

9. Responsibilities

- **Senior Management:** approves and oversees this policy and upholds the zero-tolerance commitment.
- **Finance and Procurement:** conduct supplier due diligence, include contractual safeguards and monitor supplier compliance.
- **Operations and Administration:** ensure all third-party engagements comply with this policy, and escalate risks.
- **Employees:** comply with this policy, stay alert to signs of exploitation, and report concerns.
- **Suppliers and Partners:** comply with this policy and cooperate with due diligence and audits.

10. Reporting and Whistleblowing

Concerns can be raised with Human Resources or the Ethics Committee. Every report is confidential and is investigated. Anyone who raises a concern in good faith is protected from retaliation.

11. Breaches

- **Employees:** any employee found to breach this policy will face disciplinary action under the Code of Ethical Business Conduct, up to and including termination of employment.

- **Suppliers and partners:** see section 7.

12. Training and Awareness

All staff receive guidance on this policy. Staff in procurement, facilities and supplier management receive targeted training on identifying and preventing modern slavery risks.

13. Monitoring and Review

Masters' Union reviews supplier practices, internal controls and reported concerns every year. This policy is reviewed every two years, or sooner if the law changes.