



In partnership with



Anti-Slavery and Human Trafficking Policy

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

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Revision History

Revision No.	Revision Date	Section No.	Remarks
1.0	August, 2022	All Sections	New Document

Dissemination

Through OUC Support Service Portal and website to all OUC students and OUC Staff.

Internal Control and Validation

To ensure compliance with this policy and procedure:

- The Director of Operations will control the compliance,
- The Project & Compliance Lead will monitor from the internal audit, and

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1.1. Policy Statement

- 1.1.1. Oryx Universal College (OUC) strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain.
- 1.1.2. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organization or in any of our supply chains.
- 1.1.3. Oryx Universal College expects the same high standards from all its contractors, suppliers, and other business partners, and as part of its contracting processes, specific prohibitions are included against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children.
- 1.1.4. OUC expect that all suppliers will hold their own suppliers to the same high standards.
- 1.1.5. This policy applies to all persons working for the College or on its behalf in any capacity, including employees at all levels, governors, directors, officers, agency workers, seconded workers, volunteers, suppliers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

1.2. Domain of Implementation

- 1.2.1. The prevention, detection and reporting of modern slavery and human trafficking in any part of our business or supply chains is the responsibility of all those working for the College or under the OUC's control.
- 1.2.2. All of those within the scope of this policy are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 1.2.3. The Management of the company has the overall responsibility to ensure that the policy complies with the different obligations imposed on them legally.
- 1.2.4. Every individual who is an employee or staff or is affiliated with the Oryx Universal College must read, understand, and comply with this policy.
- 1.2.5. All Suppliers, third party companies associated with OUC are expected to comply with this policy and code of conduct.

- 1.2.6. If the breach of this policy is believed or suspected to have occurred, or that it may occur, it is the responsibility of the individual to notify the management without delay.
- 1.2.7. If there is any doubt about whether an action, the treatment of workers more generally, or their working conditions in the supply chains constitutes any of the various forms of modern slavery, this can be raised with the management at any time.
- 1.2.8. Zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.
- 1.2.9. OUC takes a risk-based approach to contracting process, and all are kept under review. This means OUC will assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery or trafficked labour in any of the contract.
- 1.2.10. Penalties and legal proceedings will be implemented in accordance with the relevant laws of the State of Qatar.

1.3. Definitions

<i>Modern slavery</i>	A term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.
<i>Human trafficking</i>	Where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

1.4. Abbreviations

OUC	Oryx Universal College
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1.5. Violation of this Policy

- 1.5.1. If the policy is breached by someone working as a primary employee of the company, they will be facing disciplinary actions which could result in termination of their employment.

1.5.2. In case of the breach of the policy by a third-party company or supplier, the company reserves the right to terminate their relationship with the party concerned.

1.5.3. However, if the parties concerned decide to amend and operate in compliance with this policy, then the contract will be under review as explained. (See 1.2.7.).

1.6. Policy Review

1.6.1. The College reserves the right to unilaterally make changes to the policy at any time in consultation with legal experts and in conjunction with the People and Culture Department to meet legal and ethical requirements.

1.7. Reporting of Non-Compliance to the Policy

1.7.1. If anyone notices suspected cases of modern slavery within OUC or anyone associated with OUC, please write an email to registry@oryx.edu.qa.

1.8. Advice and Information

1.8.1. Further Information on this Policy are available on the College's Webpages at <https://www.oryx.edu.qa/policies/> or by contacting the Academic Registry via telephone numbers +974 4021 0000 or via email at registry@oryx.edu.qa.

1.8.2. The OUC Academic Registry Staff are available to advise Students on such matters such as concerns about potential offences, personal safety, and police procedures. If students wish to contact, they can do so at Academic Registry.

1.8.3. Students can seek advice and support from OUC by various means through personal tutor, student wellbeing officer, Associate Dean of Students Wellbeing and Success, in regard to concerns as associated with this policy.

1.8.4. Further information and contact details are available on the College Web pages at <https://www.oryx.edu.qa/>.