



KIMYO INTERNATIONAL UNIVERSITY IN TASHKENT

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

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1. Policy Overview

The University is committed to upholding human dignity, fundamental human rights, and fair and ethical treatment of all individuals within its community and supply chains. The University has zero tolerance for modern slavery, human trafficking, forced labour, servitude, debt bondage, and other forms of exploitation.

This Policy establishes the University's commitment to preventing, identifying, and addressing risks of modern slavery and human trafficking across its operations, employment practices, procurement activities, and relationships with suppliers, contractors, recruitment agencies, and other external partners.

The University expects all employees, students, contractors, suppliers, and partners to respect these principles and to take appropriate action where concerns regarding exploitation arise.

The University will promote awareness of modern slavery risks, apply proportionate due diligence to relevant activities and third parties, provide appropriate channels for reporting concerns, and take reasonable corrective measures when violations are identified.

This Policy supports the University's broader commitments to ethical governance, social responsibility, decent work, human rights, and sustainable institutional development.

2. Purpose

The purpose of this Policy is to establish a clear framework for preventing and addressing modern slavery and human trafficking within the University and its associated activities.

The Policy aims to:

- prevent forced labour, human trafficking, and other forms of exploitation;
- promote fair, safe, and ethical employment practices;
- identify and manage potential modern slavery risks in the University's operations and supply chains;
- establish clear responsibilities for employees and relevant University units;
- provide appropriate mechanisms for reporting and responding to concerns; and

- promote awareness of human rights and ethical labour practices among the University community and external partners.

Through this Policy, the University seeks to ensure that its activities and relationships are conducted with respect for human dignity, applicable labour standards, and fundamental human rights.

3. Scope

This Policy applies to all University activities and to individuals and organisations involved in or working on behalf of the University.

It applies to:

- academic and administrative staff;
- students and interns;
- contractors, consultants, temporary workers, and volunteers;
- suppliers, service providers, recruitment agencies, and other business partners; and
- organisations or individuals engaged through partnerships, projects, or other contractual relationships with the University.

The Policy covers the University's employment and recruitment practices, procurement and supply chain activities, contracted services, and other areas where a risk of modern slavery or human trafficking may arise.

All relevant parties are expected to comply with this Policy and support the University's commitment to preventing exploitation and protecting human rights.

4. Policy Statement

The University has zero tolerance for modern slavery, forced labour, human trafficking, servitude, and exploitation.

The University will take reasonable and proportionate measures to prevent such practices within its operations and to reduce the risk of their occurrence within its supply chains and business relationships.

The University expects all members of its community and external partners to uphold the same principles.

4. Definitions

For the purposes of this Policy, modern slavery refers to situations in which a person is exploited and cannot refuse or leave their situation because of threats, coercion, deception, abuse of power, or other forms of control.

Modern slavery may include:

- forced or compulsory labour;
- human trafficking;
- slavery and servitude;
- debt bondage;
- forced or exploitative employment;
- unlawful withholding of wages or identity documents; and
- other practices involving coercion or severe exploitation.

5. Prohibited Practices

The University prohibits any form of modern slavery, human trafficking, forced labour, or severe labour exploitation in its operations and working relationships.

The following practices are strictly prohibited:

- forcing or coercing any person to provide labour or services;

- recruiting, transporting, transferring, or receiving individuals for the purpose of exploitation;
- using threats, violence, intimidation, deception, or abuse of power to control a person;
- withholding identity documents, wages, or other personal property without lawful justification;
- requiring workers to pay unlawful recruitment fees or other exploitative charges;
- using debt or financial dependency to restrict a person's freedom to leave employment;
- employing children in circumstances prohibited by applicable legislation;
- subjecting any person to slavery, servitude, or other forms of involuntary labour; and
- knowingly engaging with or supporting organisations involved in modern slavery or human trafficking.

Any suspected violation of these requirements should be reported through the University's established reporting channels and addressed in accordance with applicable procedures and legislation.

6. Responsibilities

Effective implementation of this Policy requires cooperation across the University and its external relationships.

6.1 University Management

University management is responsible for providing appropriate oversight, resources, and support for the implementation of this Policy and for promoting a culture of respect for human rights.

6.2 Human Resources

The Human Resources function is responsible for supporting fair and transparent recruitment and employment practices and for identifying and addressing relevant risks associated with recruitment and employment.

6.3 Procurement and Contract Management

Relevant procurement and administrative units are responsible for considering modern slavery risks when selecting and managing suppliers, contractors, recruitment agencies, and service providers, particularly where higher-risk activities or supply chains are involved.

6.4 Employees and Students

All employees and students are expected to:

- comply with this Policy;
- respect the dignity and rights of others;
- remain alert to potential signs of exploitation; and
- report suspected modern slavery or human trafficking through appropriate University channels.

6.5 Suppliers and Contractors

Suppliers, contractors, and other external partners are expected to comply with applicable laws and uphold appropriate labour and human rights standards. Where relevant, they may be required to provide information or cooperate with the University's due diligence and monitoring activities.

6.6 Responsible Unit

The designated University unit shall coordinate the implementation, monitoring, periodic review, and communication of this Policy and shall work with relevant departments to address identified risks.

7. Recruitment and Employment Practices

The University is committed to ensuring that recruitment and employment practices are fair, transparent, lawful, and free from coercion or exploitation.

The University will:

- ensure that employment is entered into voluntarily and that employment terms are clearly communicated;
- provide employees with appropriate information about their role, responsibilities, remuneration, and working conditions;
- prohibit the use of threats, intimidation, deception, or coercion in recruitment or employment;
- not knowingly use recruitment practices that involve unlawful or exploitative fees charged to workers;
- respect employees' rights to retain their personal identification documents and personal property;
- ensure that wages and employment conditions comply with applicable legislation and University requirements; and
- take reasonable measures to ensure that recruitment agencies and other employment intermediaries acting on behalf of the University follow these principles.

The University will pay particular attention to situations involving temporary, outsourced, migrant, or otherwise vulnerable workers where there may be an increased risk of exploitation.

Any concern regarding recruitment or employment practices that may indicate forced labour, trafficking, or exploitation should be reported through the University's established reporting channels.

8. Procurement and Supply Chain

The University recognises that modern slavery risks may arise within its procurement activities and supply chains, particularly where services involve contractors, subcontractors, recruitment agencies, temporary workers, or labour-intensive activities.

The University expects suppliers, contractors, and service providers to respect human rights and comply with applicable labour legislation. Procurement and contract management processes should take relevant modern slavery risks into consideration when establishing and maintaining relationships with external organisations.

Where there is a reasonable indication of a modern slavery risk, the University may request relevant information from the supplier or contractor and take appropriate measures

to assess and address the concern. Where serious violations are identified, the University may require corrective action or reconsider, suspend, or terminate the relevant contractual relationship in accordance with applicable contractual requirements and procedures.

The University will promote responsible procurement practices and encourage its suppliers and partners to maintain appropriate standards throughout their own operations and supply chains.

9. Risk Identification and Due Diligence

The University recognises that the risk of modern slavery may vary depending on the nature of an activity, employment arrangement, supplier relationship, and the circumstances in which goods or services are provided.

Relevant University units should remain attentive to circumstances that may indicate an increased risk of forced labour, human trafficking, or exploitation. Particular consideration should be given to outsourced services, temporary or agency workers, recruitment practices, construction and maintenance activities, and supply chains involving vulnerable workers.

Where a potential risk is identified, the University may conduct appropriate due diligence and seek relevant information from the individuals or organisations concerned. The level of due diligence should be proportionate to the nature and seriousness of the identified risk.

Identified risks should be appropriately documented and addressed through preventive or corrective measures. Where necessary, responsible University units may seek advice from relevant internal bodies or competent authorities.

10. Reporting Concerns

The University encourages all members of its community to report any concern or suspicion relating to modern slavery, human trafficking, forced labour, or serious exploitation.

A concern may be reported through the University's established reporting, ethics, safeguarding, or whistleblowing channels. Reports should be made as soon as reasonably possible and should contain sufficient information to allow the concern to be assessed.

The University will treat reports seriously and handle them confidentially to the extent permitted by applicable legislation and internal procedures. Information relating to a report will be shared only with persons who have a legitimate need to know.

No individual should be subject to retaliation, discrimination, or other adverse treatment for raising a genuine concern in good faith. The University will take appropriate action where retaliation against a person who has made a good-faith report is identified.

11. Response and Remediation

The University will respond appropriately to credible concerns or identified cases of modern slavery, human trafficking, forced labour, or serious exploitation.

Where a concern is raised, the responsible University unit will assess the available information and determine whether further review or investigation is required. The response will take into account the nature and seriousness of the concern and the circumstances of any individuals who may be affected.

Where modern slavery or related exploitation is identified, appropriate measures will be taken to protect affected individuals, address the underlying issue, and prevent recurrence. Where the matter involves a supplier, contractor, recruitment agency, or other

external party, the University may require corrective measures and may reconsider the continuation of the relevant relationship.

Cases that may involve unlawful conduct will be referred to the appropriate competent authorities in accordance with applicable legislation and University procedures.

12. Awareness and Training

The University recognises that awareness is an important element in preventing modern slavery and human trafficking.

The University will promote awareness of the risks, indicators, and potential consequences of modern slavery among relevant members of the University community. Information may be provided through internal communications, staff guidance, induction activities, training sessions, and other appropriate awareness initiatives.

Relevant employees whose responsibilities involve recruitment, human resources, procurement, contract management, or the supervision of outsourced services may receive additional guidance or training appropriate to their roles.

The University may also communicate its expectations regarding modern slavery and ethical labour practices to relevant suppliers, contractors, and other external partners.

13. Monitoring and Review

The University will monitor the implementation and effectiveness of this Policy as part of its commitment to responsible governance and the protection of human rights.

Relevant University units may periodically review recruitment and employment practices, procurement arrangements, supplier relationships, reported concerns, and other areas where modern slavery risks may arise. The results of such reviews may be used to identify areas for improvement and strengthen existing preventive measures.

The responsible University unit will maintain appropriate records relating to the implementation of this Policy and, where relevant, report significant issues to the appropriate management or governing body.

This Policy will be reviewed periodically and updated where necessary to reflect changes in applicable legislation, University practices, identified risks, and recognised standards.

14. Compliance and Accountability

Compliance with this Policy is the responsibility of all individuals and organisations within its scope. Employees, students, contractors, suppliers, and other relevant parties are expected to act consistently with the principles and requirements established by the Policy.

Failure to comply with the Policy may result in appropriate action in accordance with applicable legislation, employment conditions, contractual requirements, and University regulations. Where a concern involves an external organisation, the University may take appropriate contractual or administrative measures.

The University will maintain appropriate oversight of the Policy and will address significant compliance concerns through the relevant management, ethics, safeguarding, or governance mechanisms.

The implementation of this Policy forms part of the University's broader commitment to ethical conduct, human rights, social responsibility, and sustainable institutional development.

15. Communication and Accessibility

The University will ensure that this Policy is appropriately communicated to members of the University community and relevant external stakeholders.

The Policy will be made available through appropriate University communication channels and may be incorporated into relevant employment, procurement, contractual, induction, and awareness materials.

The University will seek to ensure that relevant individuals understand their responsibilities under the Policy and know how to raise concerns regarding modern slavery or human trafficking.

Where appropriate, the Policy may be made available in languages and formats that support accessibility for the University's community and relevant stakeholders.

16. Governance, Approval and Review

The implementation of this Policy is overseen through the University's established governance structure. The designated responsible unit shall coordinate its implementation, monitor relevant activities, and support periodic review of its effectiveness.

The Policy shall be approved by the University's authorised governing body and communicated to relevant members of the University community and external stakeholders.

The Policy shall be reviewed periodically, or earlier where significant changes in legislation, institutional activities, identified risks, or governance requirements make such a review necessary.