



TYPE: POLICY	
SUBJECT: ANTI SLAVERY AND HUMAN TRAFFICKING POLICY	REFERENCE: LWP14
DATE OF POLICY: 1 <sup>st</sup> October, 2020	
LAST REVIEWED:	
APPROVED BY: Board of Directors	
<p><b>1. The Policy</b></p> <p>i. As one of the companies within the Vassallo Group, Learning Works disassociate itself with any activity/business which is directly or indirectly related or which might in any circumstances lead to modern slavery.</p> <p>ii. We consider modern slavery in all its' forms as a fundamental violation of human rights which deprives the person from his freedom and leads to exploitation. Mainly this includes but not exclude other forms:</p> <ul style="list-style-type: none"> <li>• Slavery</li> <li>• Servitude</li> <li>• Forced and compulsory labour</li> <li>• Human trafficking</li> </ul> <p>iii. As a company we strive to act immediately to address any issue related to modern slavery, adapting zero-tolerance approach by:</p> <ul style="list-style-type: none"> <li>• Act ethically and with integrity at all time</li> <li>• Conduct our business within a legal framework</li> <li>• Set an effective system to continuously control that no abuse takes place</li> </ul> <p>iv. To eradicate this inhuman activity, we continuously check that we do business with partners sharing the same values and that they promote an Anti-Slavery and Human Trafficking approach.</p>	

v. This policy binds all employees, in all levels, who work at Learning Works. It also expects that all students share and promote the same values.

vi. This policy is communicated to all employees and to all students and may be updated from time to time to reflect the latest developments.

## **2. Responsibility**

i. The Directors within the company have the obligation to ensure that all the employees at all levels, third parties doing business with the company and students following courses at the Institution complies and share the values of this policy.

ii. It obliges the lecturers to promote the values expressed in this Policy during all their activities, but especially during lectures and take the necessary actions when they notice any activity which is related or might lead to the violation of human rights with regards to Anti-Slavery and human trafficking.

iii. This Policy obliges the students to act responsibly towards their fellow colleagues, act as guardians to each other and report immediately to the proper authorities any form of Anti-Slavery and Human trafficking suspects. This will help to eradicate and stop any illegal violation immediately.

## **3. Compliance**

i. It is important that you read, understand, share, and comply with this policy.

ii. All those working with Learning Works are obliged to prevent, detect and report immediately to their next in line responsible person, any form of modern slavery. Furthermore, they are obliged to avoid doing any form of activity with third parties who does not share the values expressed in this Policy.

iii. All employees or students are expected to report immediately to their next in line responsible person any form of activity or any suspect of activity which might lead to modern slavery.

iv. To eradicate and address any form of modern slavery, all employees and students are encouraged to flag immediately to their next in line responsible person any suspect of violation with this regard.

v. The Whistle Blower Policy adopted by our company will offer you full protection and support to report immediately any form of modern slavery.

vi. If you have any suspect about any activity or have any concern about any action which involves or might lead to modern slavery, you are encouraged to disclose such suspects/concerns with your next in line responsible persons or any other responsible person of your trust within the company.

vii. If such disclosure will be affecting the rights or wellbeing of other humans with respect to modern slavery, the recipient is obliged to report immediately to the respective responsible next in line person, whilst protecting your confidentiality.

viii. This Policy aims to protect not only those who might be a victim of modern human slavery but also to those who have the courage to take the necessary actions to eradicate it. Therefore, if you feel that in some way or another you have been mistreated after reporting in good faith any action/activity which might lead to modern trafficking, you are highly encouraged to report this behaviour to your next in line responsible person or to follow our Company Student Complaints, Appeals & Grievances Policy and Procedure

#### **4. Communication & Awareness**

i. This Policy is communicated with all employees within our Company and all the students who register with us. It is not part of their contract; however, they are made aware of it when presented with the Company Policies.

ii. We share the values expressed within this Policy with our business partners and make them aware that we do not tolerate any violation with regards to modern slavery.

#### **5. Breaches**

i. Any breaches of this Policy would lead our employees to be stopped from any duties within the company and the students to terminate their course of studies.

ii. The company also exercise the right to withhold or stop any business or activity with third parties who will not share or at any time stop to share the values expressed in this policy.

Charlo Bonnici  
CEO