

MODERN SLAVERY AND HUMAN TRAFFICKING GUIDELINE

INTRODUCTION

Middle East College (MEC) is dedicated to conducting its activities ethically, transparently, and in strict compliance with the laws of the Sultanate of Oman. MEC maintains a **zero-tolerance policy** towards all forms of modern slavery, forced labour, human trafficking, and exploitation.

MEC recognises that modern slavery is a grave breach of human rights and conflicts with MEC's values of dignity, fairness, equity, and respect.

PURPOSE

This guideline aims to:

- Prevent modern slavery and human trafficking within MEC operations and supply chains
 - Ensure adherence to **Omani labour, immigration, and criminal laws**.
 - Provide clarity on identifying, reporting and responding to suspected cases
 - Promote ethical recruitment, employment and contracting practices
 - Protect vulnerable individuals from exploitation
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SCOPE

This guideline applies to:

- All MEC employees (FT, PT, ST)
 - Contractors, service providers, vendors and suppliers
 - Recruitment agencies engaged by or on behalf of MEC
 - Any third party operating on MEC premises or delivering services to MEC
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DEFINITIONS

Modern Slavery:

Includes forced labour, bonded labour, servitude, human trafficking, exploitation, coercion, and any practice where a person is deprived of liberty or freedom for exploitation purposes.

Human Trafficking:

The recruitment, transportation, transfer, harbouring, or receipt of persons through threats, force, coercion, deception, or abuse of power for exploitation.

Forced Labour:

Any work or service demanded from a person under threat, penalty, or coercion, where the individual has not offered themselves voluntarily.

SECTION A: ETHICAL EMPLOYMENT PRACTICES

MEC commits to the following principles:

- Employment is freely chosen and based on informed consent
 - No employee shall be:
 - Forced to work against their will
 - Threatened with penalties, deportation or harm
 - Subjected to deception regarding job roles or conditions
 - All terms of employment shall be:
 - Clearly documented
 - Understood by the employee
 - Compliant with Oman Labour Law
 - Employees shall:
 - Retain their passports and personal documents
 - Not be charged recruitment or placement fees by MEC
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SECTION B: RECRUITMENT AND AGENCIES

- MEC shall only engage **licensed and reputable recruitment agencies**
 - Recruitment agencies must:
 - Comply with Omani labour and immigration laws
 - Not charge recruitment fees to workers
 - Not withhold documents or impose debt bondage
 - Any agency found engaging in exploitative practices shall be:
 - Immediately terminated
 - Reported to relevant authorities where required
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SECTION C: SUPPLY CHAIN AND CONTRACTORS

- Contractors and suppliers must comply with:
 - Oman Labour Law
 - Applicable health, safety and welfare standards
 - MEC reserves the right to:
 - Conduct audits or checks
 - Request compliance declarations
 - Terminate contracts for violations
 - High-risk services (cleaning, security, maintenance, labour supply) shall be subject to enhanced scrutiny
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SECTION D: IDENTIFICATION OF RISK INDICATORS

Staff should remain vigilant for indicators such as:

- Workers appearing fearful, withdrawn or controlled
 - Lack of access to personal documents
 - Excessive working hours without rest
 - Unexplained wage deductions or non-payment
 - Workers being housed in poor or overcrowded conditions
 - Third parties speaking on behalf of workers
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SECTION E: REPORTING AND ESCALATION

- Any suspicion or concern regarding modern slavery must be reported immediately to:
 - Line Manager **or**
 - HRD **or**
 - DALA
 - Reports shall be:
 - Treated confidentially
 - Investigated promptly and fairly
 - Made without fear of retaliation
 - MEC shall cooperate fully with:
 - Ministry of Labour
 - Royal Oman Police
 - Other competent authorities where required by law
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SECTION F: PROTECTION AND SUPPORT

Where a potential victim is identified:

- MEC shall prioritise the **safety, dignity and wellbeing** of the individual
 - The individual shall not be penalised for reporting concerns
 - Appropriate support and referrals shall be provided
 - Employment-related decisions shall comply with legal and humanitarian obligations
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SECTION G: DISCIPLINARY AND LEGAL ACTION

- Any MEC employee found involved in modern slavery or exploitation shall face:
 - Immediate disciplinary action
 - Possible termination of employment
 - Referral to law enforcement authorities
 - Contractors or vendors involved shall face:
 - Contract termination
 - Legal action where applicable
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SECTION H: TRAINING AND AWARENESS

- MEC shall promote awareness of modern slavery risks through:
 - Induction programmes
 - Staff briefings and guidance
 - Manager and HR training
 - Senior management shall ensure ongoing oversight and accountability
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SECTION I: REVIEW AND GOVERNANCE

- This guideline shall be reviewed:
 - Every two years, or
 - Earlier if required by legislative or operational changes
- Oversight responsibility rests with:
 - Director of Administration and Legal Affairs
 - Human Resources Department